

**EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** North Hobbs Plant**Start Date:** 02/26/2022 @ 04:53 PM**End Date:** 02/26/2022 @ 05:28 PM**Cause:** THE NORTH HOBBS PLANT FLARED WHEN "F" TRAIN SHUT DOWN ON 3<sup>RD</sup> STAGE LOW/LOW TEMPERATURE.**Duration of event:** 0:35 hours**Method of Flared Gas Measurement:** Flare Meter

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**1. Reason why this event was beyond Operator's control:**

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure flame is lit and meeting opacity requirements.

This event was a sudden and unforeseeable gas release to the flare due to the shutdown of the compressor unit. Oxy operators were notified of the shutdown of "F" train compressor due to 3<sup>rd</sup> stage low/low suction temperature. OXY operators assisted with shutting down the unit completely and getting the unit blown down, and this shut down of the compressor unit triggered a flaring event.

Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. OXY made every effort to control and minimize emissions as much as possible during this event.

**2. Steps Taken to limit duration and magnitude of venting or flaring:**

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure flame is lit and meeting opacity requirements.

In this case, the steps taken to limit duration and magnitude of flaring was for Oxy operators to quickly respond to the compression equipment and get them blown down completely, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. After thoroughly inspecting the compressor unit that shut down, it will be brought back to normal working service when it is loaded and ready for a start.

Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. OXY made every effort to control and minimize emissions as much as possible during this event.

**3. Corrective Actions taken to eliminate the cause and reoccurrence of venting or flaring:**

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements.

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. "F" train was working as designed and operated normally prior to the sudden and without warning send of gas to the flare from the compressor unit. Oxy has a strong and positive compression equipment preventative maintenance program in place. This incident was completely out of OXY's control to prevent from happening as it was determined the flaring was due to train "F" shutting down and sending gas to the flare due to low temperature and the compressor shutting down. OXY made every effort to control and minimize emissions as much as possible during this event. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

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**District IV**  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

DEFINITIONS

Action 87655

**DEFINITIONS**

|   |  |
|---|--|
| Operator:<br>OCCIDENTAL PERMIAN LTD<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>157984                                       |
|   | Action Number:<br>87655                                |
|   | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

**DEFINITIONS**

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:

- this application's operator, hereinafter "this operator";
- venting and/or flaring, hereinafter "vent or flare";
- any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";
- the statements in (and/or attached to) this, hereinafter "the statements in this";
- and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 87655

**QUESTIONS**

|   |  |
|---|--|
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**QUESTIONS**

|   |  |
|---|--|
| <b>Prerequisites</b>  |  |
| <i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i> |  |
| Incident Well   | Not answered.                            |
| Incident Facility   | [fKJ1517634129] NORTH HOBBS UNIT RCF/WIB |

|   |   |
|---|---|
| <b>Determination of Reporting Requirements</b>  |   |
| <i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>  |   |
| Was this vent or flare caused by an emergency or malfunction  | Yes   |
| Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event  | No  |
| Is this considered a submission for a vent or flare event   | Yes, minor venting and/or flaring of natural gas. |
| <i>An operator shall file a form C-141 instead of a form C-129 for a release that, includes liquid during venting and/or flaring that is or may be a major or minor release under 19.15.29.7 NMAC.</i>  |   |
| Was there at least 50 MCF of natural gas vented and/or flared during this event   | Yes   |
| Did this vent or flare result in the release of ANY liquids (not fully and/or completely flared) that reached (or has a chance of reaching) the ground, a surface, a watercourse, or otherwise, with reasonable probability, endanger public health, the environment or fresh water | No  |
| Was the vent or flare within an incorporated municipal boundary or within 300 feet from an occupied permanent residence, school, hospital, institution or church in existence   | No  |

|   |               |
|---|---------------|
| <b>Equipment Involved</b>                                 |               |
| Primary Equipment Involved                                | Not answered. |
| Additional details for Equipment Involved. Please specify | Not answered. |

|  |               |
|--|---------------|
| <b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>   |               |
| <i>Please provide the mole percent for the percentage questions in this group.</i>   |               |
| Methane (CH4) percentage   | 4             |
| Nitrogen (N2) percentage, if greater than one percent  | 0             |
| Hydrogen Sulfide (H2S) PPM, rounded up   | 7,860         |
| Carbon Dioxide (CO2) percentage, if greater than one percent   | 0             |
| Oxygen (O2) percentage, if greater than one percent  | 0             |
| <i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i> |               |
| Methane (CH4) percentage quality requirement   | Not answered. |
| Nitrogen (N2) percentage quality requirement   | Not answered. |
| Hydrogen Sulfide (H2S) PPM quality requirement   | Not answered. |
| Carbon Dioxide (CO2) percentage quality requirement  | Not answered. |
| Oxygen (O2) percentage quality requirement   | Not answered. |

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QUESTIONS, Page 2

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**QUESTIONS (continued)**

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**QUESTIONS**

| Date(s) and Time(s)                            |            |
|--|------------|
| Date vent or flare was discovered or commenced | 02/26/2022 |
| Time vent or flare was discovered or commenced | 04:53 PM   |
| Time vent or flare was terminated              | 05:28 PM   |
| Cumulative hours during this event             | 0          |

| Measured or Estimated Volume of Vented or Flared Natural Gas              |  |
|---|--|
| Natural Gas Vented (Mcf) Details  | Not answered.  |
| Natural Gas Flared (Mcf) Details  | Not answered.  |
| Other Released Details  | Cause: Equipment Failure   Other (Specify)   Natural Gas Flared   Released: 373 Mcf   Recovered: 0 Mcf   Lost: 373 Mcf |
| Additional details for Measured or Estimated Volume(s). Please specify    | Not answered.  |
| Is this a gas only submission (i.e. only significant Mcf values reported) | Yes, according to supplied volumes this appears to be a "gas only" report.   |

| Venting or Flaring Resulting from Downstream Activity             |               |
|---|---------------|
| Was this vent or flare a result of downstream activity            | No            |
| Was notification of downstream activity received by this operator | Not answered. |
| Downstream OGRID that should have notified this operator          | Not answered. |
| Date notified of downstream activity requiring this vent or flare | Not answered. |
| Time notified of downstream activity requiring this vent or flare | Not answered. |

| Steps and Actions to Prevent Waste   |   |
|--|---|
| For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control. | True  |
| Please explain reason for why this event was beyond this operator's control  | The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. |
| Steps taken to limit the duration and magnitude of vent or flare   | The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. |
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare  | The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. |

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ACKNOWLEDGMENTS

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**ACKNOWLEDGMENTS**

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be a <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.  |
| <input checked="" type="checkbox"/> | I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to this operator) to track any C-129 forms, pursuant to 19.15.27.7 and 19.15.28.8 NMAC and understand that this submission meets the notification requirements of Paragraph (1) of Subsection G and F respectively. |
| <input checked="" type="checkbox"/> | I hereby certify the statements in this report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.  |
| <input checked="" type="checkbox"/> | I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.                       |
| <input checked="" type="checkbox"/> | I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.  |

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CONDITIONS  
 Action 87655

**CONDITIONS**

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**CONDITIONS**

| Created By | Condition  | Condition Date |
|------------|--|----------------|
| ralvarado  | If the information provided in this report requires an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event. | 3/7/2022       |