



Certificate of Analysis

Number: 6030-22030260-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Mar. 17, 2022

Field: Pue Gold
Station Name: Gold CTB Check Meter
Station Number: 17200c
Sample Point: Meter
Meter Number: 4000524218
County: Eddy
Type of Sample: Spot-Cylinder
Heat Trace Used: No
Sampling Method: Fill and Purge
Sampling Company: OXY

Sampled By: Scott Beasley
Sample Of: Gas Spot
Sample Date: 03/15/2022 09:00
Sample Conditions: 78.3 psig, @ 53.2 °F Ambient: 42 °F
Effective Date: 03/15/2022 09:00
Method: GPA-2261M
Cylinder No: 1111-002654
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 03/07/2022 0:00 AM
Analyzed: 03/17/2022 09:15:18 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	2.356	2.37352	2.988	
Carbon Dioxide	2.378	2.39487	4.736	
Methane	73.277	73.81252	53.210	
Ethane	11.392	11.47495	15.505	3.063
Propane	5.864	5.90635	11.703	1.624
Iso-Butane	0.769	0.77462	2.023	0.253
n-Butane	1.921	1.93544	5.055	0.609
Iso-Pentane	0.429	0.43214	1.401	0.158
n-Pentane	0.448	0.45117	1.463	0.163
Hexanes	0.219	0.22080	0.855	0.091
Heptanes	0.150	0.15059	0.678	0.069
Octanes	0.058	0.05873	0.301	0.030
Nonanes Plus	0.014	0.01430	0.082	0.008
	99.275	100.00000	100.000	6.068

Calculated Physical Properties

	Total	C9+
Calculated Molecular Weight	22.25	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7710	4.4283

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1245.2	6974.4
Water Sat. Gas Base BTU	1223.9	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1240.5	6974.4
Ideal, Gross HV - Wet	1218.7	6852.4

Comments: H₂S Field Content 0 ppm
Mcf/day 33915

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Gold NC 29 CTB**Date:** 06/01/2022**Duration of event:** 10 Minutes**MCF Flared:** 60**Start Time:** 08:50 PM**End Time:** 09:00 PM**Cause:** Equipment Fail > Tank Dump Valve**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. In this case, Iridium Satellite tester #1 oil side dump valve controller failed to shut, which then prompted gas to be sent to the Gold CTB facility. Gas flowed down the oil line to the facility's production heater treater units #1 & #2, which then began increasing the amount of pressure normally breaking out of the oil stream. The extra volume of gas over pressured the high pressure VRU's at the facility, which then triggered a shutdown of the equipment on a high inlet suction pressure malfunction. Once the high pressure VRU's were non-operational, the extra gas was sent to the low pressure flare. The dump valve was repaired by the production tech, who on-site, at the time, and once the repair was complete, and return to its normal working condition, gas pressures dropped and the high pressure VRU's alarms were cleared and returned back to normal operation. All of Oxy's facility equipment were operating as designed prior to the sudden and unexpected flaring event occurring.

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring, which in turn, are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, increased sensor pressure/level alarms, other process equipment issues, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. In this case, Iridium Satellite tester #1 oil side dump valve controller failed to shut, which then prompted gas to be sent to the Gold CTB facility. Gas flowed down the oil line to the facility's production

heater treater units #1 & #2, which then began increasing the amount of pressure normally breaking out of the oil stream. The extra volume of gas over pressured the high pressure VRU's at the facility, which then triggered a shutdown of the equipment on a high inlet suction pressure malfunction. Once the high pressure VRU's were non-operational, the extra gas was sent to the low pressure flare. The dump valve was repaired by the production tech, who on-site, at the time, and once the repair was complete, and return to its normal working condition, gas pressures dropped and the high pressure VRU's alarms were cleared and returned back to normal operation. All of Oxy's facility equipment were operating as designed prior to the sudden and unexpected flaring event occurring.

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

Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of this type of dump control valve equipment fail malfunction as notwithstanding typical operating equipment design and operations are inherently dynamic and even the smallest fails or malfunctions, false or true, can be sudden, reasonably unforeseeable and unexpected. The only action that Oxy can take is to continue with the equipment preventative maintenance program for this facility and coordinate with its automation team personnel to look into this type of unexpected malfunction to prevent a potential recurrence of such. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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District III
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District IV
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Phone:(505) 476-3470 Fax:(505) 476-3462

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

DEFINITIONS

Action 120323

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 120323
	Action Type: [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: <ul style="list-style-type: none">• 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 120323

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 120323
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS**Prerequisites**

Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.

Incident Well	Not answered.
Incident Facility	[fAPP2126660185] GOLD BATTERY

Determination of Reporting Requirements

Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.

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.

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.

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

Equipment Involved

Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Equipment Fail > Tank Dump Valve

Representative Compositional Analysis of Vented or Flared Natural Gas

Please provide the mole percent for the percentage questions in this group.

Methane (CH4) percentage	74
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	2
Oxygen (O2) percentage, if greater than one percent	0

If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.

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

Action 120323

QUESTIONS (continued)

Operator: <div>OXY USA INC P.O. Box 4294 Houston, TX 772104294</div>	OGRID: 16696
	Action Number: 120323
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	06/10/2022
Time vent or flare was discovered or commenced	08:50 PM
Time vent or flare was terminated	09:00 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	Cause: Other Other (Specify) Natural Gas Flared Released: 60 Mcf Recovered: 0 Mcf Lost: 60 Mcf
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Gas Flare Meter
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 interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. In this case, Iridium Satellite tester #1 oil side dump valve controller failed to shut, which then prompted gas to be sent to the Gold CTB facility. Gas flowed down the oil line to the facility's production heater treater units #1 & #2, which then began increasing the amount of pressure normally breaking out of the oil stream. The extra volume of gas over pressured the high pressure VRU's at the facility, which then triggered a shutdown of the equipment on a high inlet suction pressure malfunction. Once the high pressure VRU's were non-operational, the extra gas was sent to the low pressure flare. The dump valve was repaired by the production tech, who on-site, at the time, and once the repair was complete, and return to its normal working condition, gas pressures dropped and the high pressure VRU's alarms were cleared and returned back to normal operation. All of Oxy's facility equipment were operating as designed prior to the sudden and unexpected flaring event occurring.
Steps taken to limit the duration and magnitude of vent or flare	In this case, Iridium Satellite tester #1 oil side dump valve controller failed to shut, which then prompted gas to be sent to the Gold CTB facility. Gas flowed down the oil line to the facility's production heater treater units #1 & #2, which then began increasing the amount of pressure normally breaking out of the oil stream. The extra volume of gas over pressured the high pressure VRU's at the facility, which then triggered a shutdown of the equipment on a high inlet suction pressure malfunction. Once the high pressure VRU's were non-operational, the extra gas was sent to the low pressure flare. The dump valve was repaired by the production tech, who on-site, at the time, and once the repair was complete, and return to its normal working condition, gas pressures dropped and the high pressure VRU's alarms were cleared and returned back to normal operation. All of Oxy's facility equipment were operating as designed prior to the sudden and unexpected flaring event occurring.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of this type of dump control valve equipment fail malfunction as notwithstanding typical operating equipment design and operations are inherently dynamic and even the smallest fails or malfunctions, false or true, can be sudden, reasonably unforeseeable and unexpected. The only action that Oxy can take is to continue with the equipment preventative maintenance program for this facility and coordinate with its automation team personnel to look into this type of unexpected malfunction to prevent a potential recurrence of such. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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ACKNOWLEDGMENTS

Action 120323

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	Action Number: 120323
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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 complete 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 120323

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	Action Number: 120323
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CONDITIONS

Created By	Condition	Condition Date
marialuna2	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.	6/24/2022