



Certificate of Analysis

Number: 6030-22030204-001A

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. 14, 2022

Field: Turkey Track
Station Name: Turkey Track CTB Sales Check
Station Number: 14670c
Sample Point: Meter
Meter Number:
County: Eddy
Type of Sample: Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: Fill and Purge
Sampling Company: OXY

Sampled By: Michael Mirabal
Sample Of: Gas Spot
Sample Date: 03/10/2022 01:30
Sample Conditions: 700 psig, @ 94 °F Ambient: 48 °F
Effective Date: 03/10/2022 01:30
Method: GPA-2261M
Cylinder No: 1111-007242
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 03/14/2022 0:00 AM
Analyzed: 03/14/2022 11:13:54 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.885
Nitrogen	2.063	2.067	2.716		GPM TOTAL C3+	2.745
Methane	76.682	76.849	57.818		GPM TOTAL iC5+	0.478
Carbon Dioxide	0.216	0.216	0.446			
Ethane	11.740	11.766	16.592	3.140		
Propane	5.541	5.553	11.484	1.527		
Iso-butane	0.686	0.687	1.873	0.224		
n-Butane	1.637	1.641	4.473	0.516		
Iso-pentane	0.369	0.370	1.252	0.135		
n-Pentane	0.377	0.378	1.279	0.137		
Hexanes Plus	0.472	0.473	2.067	0.206		
	99.783	100.000	100.000	5.885		

Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7386	3.2176
Calculated Molecular Weight	21.32	93.19
Compressibility Factor	0.9964	

GPA 2172 Calculation:

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

Real Gas Dry BTU	1255	5113
Water Sat. Gas Base BTU	1233	5024
Ideal, Gross HV - Dry at 14.65 psia	1250.3	5113.2
Ideal, Gross HV - Wet	1228.4	5023.7
Net BTU Dry Gas - real gas	1139	
Net BTU Wet Gas - real gas	1119	

Comments: H₂S Field Content 0 ppm
Mcf/day 9365

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:** Turkey Track CTB**Flare Date:** 09/02/2022**Duration of event:** 25 Minutes**MCF Flared:** 93**Start Time:** 10:36 AM**End Time:** 11:01 AM**Cause:** Equipment Issues > Loss of Instrument Air > Compressor Malfunctions > Compression Equipment Shut Down**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:**

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

The emissions were caused by the sudden, 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 maintenance practices. In this case, the loss of instrument air caused compressor malfunctions to occur, which in turn, prompted the shutdown of the facility's compression equipment. As a result of the compression equipment being shut down, there was no gas take away and the facility over pressured which then triggered a flaring event to occur. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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 its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. In this case, the loss of instrument air caused compressor malfunctions to occur, which in turn, prompted the shutdown of the facility's compression equipment. As a result of the compression equipment being shut down, there was no gas take away and the facility over pressured which then triggered a flaring event to occur. The Oxy production tech received and responded to both the Lolo instrument air alarms and compression malfunction alarms for the facility rather quickly, and after inspecting the compression equipment and instrument air equipment, the Oxy production tech was able to troubleshoot the issue, clear the alarms and restart the compression equipment. The Oxy production tech also called for an automation tech to be dispatched to inspect the instrument air equipment as a safeguard. Once compression equipment reached its maximized optimized operation did flaring cease.

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

Oxy is limited in its ability to take any corrective actions to eliminate the cause and potential reoccurrence of instrument air equipment failures as notwithstanding proper instrument air equipment design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can prompt equipment to fail and/or malfunction, which in turn, triggers compressor unit malfunctions to occur as well, without warning or advance notice. Instrument air equipment and compressor engines are designed to operate in precise manners and when malfunctions occur, it disrupts the operating manner of such equipment, which in turn, can rob them of power, which can cause malfunction alarms and automatic shutdowns of equipment. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control in this circumstance, is to work and communicate with automation personnel to increase its inspections of applicable facility equipment.

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District II
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District III
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Phone:(505) 334-6178 Fax:(505) 334-6170
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 146432

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 146432
	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 146432

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 146432
	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	[fAPP2126265645] TURKEY TRACK CTB

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 Issues > Loss of Instrument Air > Compressor Malfunctions > Compression Equipment Shut Down

Representative Compositional Analysis of Vented or Flared Natural Gas

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

Methane (CH4) percentage	77
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	0
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 146432

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	09/02/2022
Time vent or flare was discovered or commenced	10:36 AM
Time vent or flare was terminated	11:01 AM
Cumulative hours during this event	1

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: 93 Mcf Recovered: 0 Mcf Lost: 93 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 were caused by the sudden, 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 maintenance practices. In this case, the loss of instrument air caused compressor malfunctions to occur, which in turn, prompted the shutdown of the facility's compression equipment. As a result of the compression equipment being shut down, there was no gas take away and the facility over pressured which then triggered a flaring event to occur. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.
Steps taken to limit the duration and magnitude of vent or flare	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 its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. In this case, the loss of instrument air caused compressor malfunctions to occur, which in turn, prompted the shutdown of the facility's compression equipment. As a result of the compression equipment being shut down, there was no gas take away and the facility over pressured which then triggered a flaring event to occur. The Oxy production tech received and responded to both the Lolo instrument air alarms and compression malfunction alarms for the facility rather quickly, and after inspecting the compression equipment and instrument air equipment, the Oxy production tech was able to troubleshoot the issue, clear the alarms and restart the compression equipment. The Oxy production tech also called for an automation tech to be dispatched to inspect the instrument air equipment as a safeguard. Once compression equipment reached its maximized optimized operation did flaring cease.
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ACKNOWLEDGMENTS

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	192463
	Action Number:
	146432
Action Type:	
[C-129] Venting and/or Flaring (C-129)	

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

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	Action Number: 146432
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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.	9/27/2022