



## Volumetrics Inc.

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

|                                       |                                               |                                 |               |
|---------------------------------------|-----------------------------------------------|---------------------------------|---------------|
| <b>Company:</b>                       | OXY USA INC                                   | <b>Work Order</b>               | 4000501489    |
| <b>Field/Location :</b>               | NMSW                                          | <b>Sampled by:</b>              | OXY/JE        |
| <b>Station Name :</b>                 | CORRAL COMPRESSOR STA 2 SOUTH FUEL SKID OUTLE | <b>Sample Type :</b>            | SPOT-CYLINDER |
| <b>Station Number :</b>               | NA                                            | <b>Sample Temperature (F):</b>  | NA            |
| <b>Sample Date:</b>                   | 2/23/22 1:30 PM                               | <b>Sample Pressure (PSIG):</b>  | 125           |
| <b>Analysis Date:</b>                 | 3/7/22 11:00 AM                               | <b>Flow rate (MCF/Day):</b>     | NA            |
| <b>Instrument:</b>                    | INFICON                                       | <b>Ambient Temperature (F):</b> | 23            |
| <b>Calibration/Verification Date:</b> | 3/7/2022                                      | <b>Sampling method:</b>         | FILL & EMPTY  |
| <b>Heat Trace used:</b>               | YES                                           | <b>Cylinder Number:</b>         | 27784         |

## NATURAL GAS ANALYSIS: GPA 2261

| Components       | Un-Normalized<br>Mol% | Normalized<br>Mol% | GPM<br>14.650 | GPM<br>14.730 | GPM<br>15.025 |
|------------------|-----------------------|--------------------|---------------|---------------|---------------|
| Hydrogen Sulfide | 0.0000                | 0.0000             |               |               |               |
| Nitrogen         | 1.3240                | 1.3598             |               |               |               |
| Methane          | 75.6525               | 77.7008            |               |               |               |
| Carbon Dioxide   | 0.1877                | 0.1928             |               |               |               |
| Ethane           | 11.5036               | 11.8151            | 3.153         | 3.170         | 3.234         |
| Propane          | 5.8586                | 6.0172             | 1.654         | 1.663         | 1.696         |
| Isobutane        | 0.7572                | 0.7777             | 0.254         | 0.255         | 0.260         |
| N-butane         | 1.6243                | 1.6683             | 0.525         | 0.528         | 0.538         |
| Isopentane       | 0.2101                | 0.2158             | 0.079         | 0.079         | 0.081         |
| N-Pentane        | 0.1809                | 0.1858             | 0.067         | 0.068         | 0.069         |
| Hexanes Plus     | 0.0650                | 0.0667             | 0.029         | 0.029         | 0.030         |
| <b>Total</b>     | <b>97.3638</b>        | <b>100.0000</b>    |               |               |               |

Hexanes plus split (60%-30%-10%)

| Physical Properties (Calculated)  | 14.650 psia        | 14.730 psia        | 15.025 psia        |
|-----------------------------------|--------------------|--------------------|--------------------|
| Total GPM Ethane+                 | 5.761              | 5.792              | 5.908              |
| Total GPM Iso-Pentane+            | 0.175              | 0.176              | 0.179              |
| Compressibility (Z)               | 0.9965             | 0.9965             | 0.9964             |
| Specific Gravity ( Air=1) @ 60 °F | 0.7242             | 0.7242             | 0.7243             |
| Molecular Weight                  | 20.911             | 20.911             | 20.911             |
| <b>Gross Heating Value</b>        | <b>14.650 psia</b> | <b>14.730 psia</b> | <b>15.025 psia</b> |
| Dry, Real (BTU/Ft <sup>3</sup> )  | 1244.9             | 1251.8             | 1276.9             |
| Wet, Real (BTU/Ft <sup>3</sup> )  | 1223.3             | 1230.0             | 1254.7             |
| Dry, Ideal (BTU/Ft <sup>3</sup> ) | 1240.6             | 1247.4             | 1272.3             |
| Wet, Ideal (BTU/Ft <sup>3</sup> ) | 1219.0             | 1225.7             | 1250.2             |

Temperature base 60 °F

**Comment:** FIELD H2S =0 PPM

## Verified by

Mostaq Ahammad  
Petroleum Chemist

## Approved by

Deann Friend  
Laboratory Manager

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Corral 2 South CS**Flare Date:** 02/11/2023**Duration of event:** 30 Minutes**MCF Flared:** 469**Start Time:** 10:20 AM**End Time:** 10:50 AM**Cause:** Emergency Flare > Downstream Activity > ETC > High O2 > VRU > Bad Pressure Transmitter**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

This event was 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 ETC, third party pipeline operator, shut in their sales gas pipeline when high O2 was detected and their ESD valve slammed shut. Oxy production techs received malfunction alarms and responded quickly and safely as possible as they were on-site. Oxy personnel determined the cause of the high O2 in the sales gas line was the result of an unexpected malfunctioning VRU pressure transmitter at the Corral Canyon 36-25 CTB. Oxy production techs, who were on-site, then shutdown the VRU and began immediately purging the O2 from the sales line. Oxy production techs also notified ETC and asked them to send a technician to reopen their slam-valve. The Oxy production tech also called Enterprise, another third-party pipe-line operator at the site, to take as much stranded gas until an ETC technician was able to open their slam valve. Notwithstanding VRU design and operation, sensors and transmitters are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable, and unexpected which can cause unexpected malfunctions to occur. Once ETC re-opened their slam valve, did flaring cease.

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

It is OXY's policy to route its 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 notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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. . In this case ETC, third party pipeline operator, shut in their sales gas pipeline when high O2 was detected and their ESD valve slammed shut. Oxy production techs received malfunction alarms and responded quickly and safely as possible as they were on-site. Oxy personnel determined the cause of the high O2 in the sales gas line was the result of an unexpected malfunctioning VRU pressure transmitter at the Corral Canyon 36-25 CTB. Oxy

production techs, who were on-site, then shutdown the VRU and began immediately purging the O2 from the sales line. Oxy production techs also notified ETC and asked them to send a technician to reopen their slam-valve. The Oxy production tech also called Enterprise, another third-party pipe-line operator at the site, to take as much stranded gas until an ETC technician was able to open their slam valve. Notwithstanding VRU design and operation, sensors and transmitters are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable, and unexpected which can cause unexpected malfunctions to occur. Once ETC re-opened their slam valve, did flaring cease.

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

Oxy is limited in the corrective actions to eliminate the cause and potential reoccurrence of an ETC gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening or reoccurring. ETC's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When ETC has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, ETC then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the ETC gas pipeline, to flare. 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, is to continually communicate with ETC personnel during these types of situations and when possible, engage in alternative third-party downstream operator strategies.

**District I**  
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Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
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**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
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**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
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 191812

DEFINITIONS

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                        |
|                                                                    | Action Number:<br>191812                               |
|                                                                    | 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: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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QUESTIONS

Action 191812

**QUESTIONS**

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
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|                                                                    | Action Number:<br>191812                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

**QUESTIONS**

|                                                                                                                                                                    |                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>Prerequisites</b>                                                                                                                                               |                                               |
| 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                                                                                                                                                      | Unavailable.                                  |
| Incident Facility                                                                                                                                                  | [fAPP2126640958] CORRAL #2 SOUTH COMP STATION |

|                                                                                                                                                                                                                                                                                            |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>Determination of Reporting Requirements</b>                                                                                                                                                                                                                                             |                                                   |
| 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 <b>ANY</b> 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                                | Other (Specify)                                                                        |
| Additional details for Equipment Involved. Please specify | Emergency Flare > Downstream Activity > ETC > High O2 > VRU > Bad Pressure Transmitter |

|                                                                                                                               |               |
|-------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>                                                  |               |
| Please provide the mole percent for the percentage questions in this group.                                                   |               |
| Methane (CH4) percentage                                                                                                      | 78            |
| Nitrogen (N2) percentage, if greater than one percent                                                                         | 1             |
| 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 191812

QUESTIONS (continued)

|                                                                    |                                                        |
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|                                                                    | Action Number:<br>191812                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

QUESTIONS

| Date(s) and Time(s)                            |            |
|------------------------------------------------|------------|
| Date vent or flare was discovered or commenced | 02/11/2023 |
| Time vent or flare was discovered or commenced | 10:20 AM   |
| Time vent or flare was terminated              | 10:50 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: 469 Mcf   Recovered: 0 Mcf   Lost: 469 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            | Yes                                   |
| Was notification of downstream activity received by this operator | No                                    |
| Downstream OGRID that should have notified this operator          | [316048] ENERGY TRANSFER PARTNERS, LP |
| 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                                                      | This event was 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 ETC, third party pipeline operator, shut in their sales gas pipeline when high O2 was detected and their ESD valve slammed shut. Oxy production techs received malfunction alarms and responded quickly and safely as possible as they were on-site. Oxy personnel determined the cause of the high O2 in the sales gas line was the result of an unexpected malfunctioning VRU pressure transmitter at the Corral Canyon 36-25 CTB. Oxy production techs, who were on-site, then shutdown the VRU and began immediately purging the O2 from the sales line. Oxy production techs also notified ETC and asked them to send a technician to reopen their slam-valve. The Oxy production tech also called Enterprise, another third-party pipe-line operator at the site, to take as much stranded gas until an ETC technician was able to open their slam valve. Notwithstanding VRU design and operation, sensors and transmitters are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable, and unexpected which can cause unexpected malfunctions to occur. Once ETC re-opened their slam valve, did flaring cease.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Steps taken to limit the duration and magnitude of vent or flare                                                                 | It is OXY's policy to route its 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 notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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. . In this case ETC, third party pipeline operator, shut in their sales gas pipeline when high O2 was detected and their ESD valve slammed shut. Oxy production techs received malfunction alarms and responded quickly and safely as possible as they were on-site. Oxy personnel determined the cause of the high O2 in the sales gas line was the result of an unexpected malfunctioning VRU pressure transmitter at the Corral Canyon 36-25 CTB. Oxy production techs, who were on-site, then shutdown the VRU and began immediately purging the O2 from the sales line. Oxy production techs also notified ETC and asked them to send a technician to reopen their slam-valve. The Oxy production tech also called Enterprise, another third-party pipe-line operator at the site, to take as much stranded gas until an ETC technician was able to open their slam valve. Notwithstanding VRU design and operation, sensors and transmitters are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable, and unexpected which can cause unexpected malfunctions to occur. |
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare                                                | Oxy is limited in the corrective actions to eliminate the cause and potential reoccurrence of an ETC gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening or reoccurring. ETC's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When ETC has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, ETC then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the ETC gas pipeline, to flare. 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, is to continually communicate with ETC personnel during these types of situations and when possible, engage in alternative third-party downstream operator strategies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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ACKNOWLEDGMENTS

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|                                                                    | Action Number:<br>191812                               |
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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 191812

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|                                                                    | Action Number:<br>191812                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

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. | 2/28/2023      |