

Station Number:

Sample Date:

Analysis Date:

Volumetrics Inc.

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

Work Order Company: OXY USA INC 4000501489 Field/Location: **NMSW** Sampled by: OXY/JE SPOT-CYLINDER

Station Name: CORRAL COMPRESSOR STA 2 SOUTH FUEL SKID OUTLE Sample Type:

> Sample Temperature (F): NA Sample Pressure (PSIG): 2/23/22 1:30 PM 125 3/7/22 11:00 AM Flow rate (MCF/Day): NA INFICON Ambient Temperature (F): 23

Instrument: Sampling method: Calibration/Verification Date: 3/7/2022 FILL & EMPTY

Cylinder Number: Heat Trace used: YES 27784

NATURAL GAS ANALYSIS: GPA 2261

	Un-Normalized	Normalized	GPM	GPM	GPM
Components	Mol%	Mol%	14.650	14.730	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
Total	97 3638	100 0000			

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

14.650 psia	14.730 psia	15.025 psia
5.761	5.792	5.908
0.175	0.176	0.179
0.9965	0.9965	0.9964
0.7242	0.7242	0.7243
20.911	20.911	20.911
14.650 psia	14.730 psia	15.025 psia
1244.9	1251.8	1276.9
1223.3	1230.0	1254.7
1240.6	1247.4	1272.3
1219.0	1225.7	1250.2
	5.761 0.175 0.9965 0.7242 20.911 14.650 psia 1244.9 1223.3 1240.6	5.761 5.792 0.175 0.176 0.9965 0.9965 0.7242 0.7242 20.911 20.911 14.650 psia 14.730 psia 1244.9 1251.8 1223.3 1230.0 1240.6 1247.4

Temperature base 60 °F

Comment: FIELD H2S =0 PPM

Verified by

Mostaq Ahammad Petroleum Chemist Approved by

Deann Friend Laboratory Manager

UPSET FLARE EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Corral 2S CS Flare Date: 05/24/2023

Duration of event: 4 Hours **MCF Flared:** 2089

Start Time: 01:40 AM End Time: 05:40 AM

Cause: Emergency Flare > Downstream Activity > ETC > Red Bluff Gas Plant > Equipment Issues

Method of Flared Gas Measurement: Gas Flare Meter

Comments:

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, third-party pipeline operator, ETC, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Red Bluff gas plant having problems with their plant equipment, which instigated an unexpected shutdown, prompting high sales line pressure to occur, which then triggered a flare event to occur twice within a 24-Hour period. These events occurred because of ETC's inability to take Oxy's volume of gas and with with no gas takeaway occurring, field psi increased until set psi levels were reached which triggered flaring as a safety measure for operations, facility equipment, and personnel.

Flaring Events:

- (1.) 01:40 AM to 02:20 AM
- (2.) 06:20 AM to 09:40 AM

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

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 line pressure alarms, 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. In this case, third-party pipeline operator, ETC, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Red Bluff gas plant having problems with their plant equipment, which instigated an unexpected shutdown, prompting high sales line pressure to occur, which then triggered a flare event to occur twice within a 24-Hour period. Immediately upon flaring occurring, in both instances, the

facility's mitigation optimizer cut injection rates to wells in the field to reduce injection rates and sales gas to return the pressure to below flare trigger setpoints of the CTB to cease flaring, which took time. All OXY operations and facility equipment were running at maximized optimization prior to the shutdown of ETC's downstream Red Bluff gas plant and their inability to take Oxy's volume of gas. This incident was completely out of Oxy's control to prevent from happening yet 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:

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 gas plants, may have issues which will reoccur from time to time and may trigger a spike in their sales 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 keep continually communicate with ETC personnel regarding these types of situations, when possible and engage in emergency alternative emission mitigation reaction strategies.

District I
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District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

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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 225696

DEFINITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	225696
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

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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1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462 **Oil Conservation Division** 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 225696

QUESTIONS

State of New Mexico Energy, Minerals and Natural Resources

Flaring (C-129A)

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 Operator	[16696] OXY USA INC	
Incident Type	Flare	
Incident Status	Closure Not Approved	
Incident Well	Unavailable.	
Incident Facility	[fAPP2126640958] CORRAL #2 SOUTH COMP STATION	
Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application.		

Determination of Reporting Requirements			
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional 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, major 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 withing 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 > Downstream Activity > ETC > Red Bluff Gas Plant > Equipment Issues	

Representative Compositional Analysis of Vented or Flared Natural Gas	
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 (C02) percentage, if greater than one percent	0
Oxygen (02) percentage, if greater than one percent	0
If you are venting and/or flaring because of Pipeline Specification, please provide the r	equired specifications for each gas.
Methane (CH4) percentage quality requirement	Not answered.
Nitrogen (N2) percentage quality requirement	Not answered.
Hydrogen Sufide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (C02) percentage quality requirement	Not answered.
Oxygen (02) percentage quality requirement	Not answered.

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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**

QUESTIONS, Page 2

Action 225696

QUESTIONS	(continued)
QUESTIONS!	(COHUHUCU)

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OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	225696
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Date(s) and Time(s)		
Date vent or flare was discovered or commenced	05/24/2023	
Time vent or flare was discovered or commenced	01:04 AM	
Time vent or flare was terminated	05:40 PM	
Cumulative hours during this event	4	

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: 2,089 Mcf Recovered: 0 Mcf Lost: 2,089 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	[267255] ENERGY TRANSFER PARTNERS, LP
Date notified of downstream activity requiring this vent or flare	
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, third-party pipeline operator, ETC, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Red Bluff gas plant having problems with their plant equipment, which instigated an unexpected shutdown, prompting high sales line pressure to occur, which then triggered a flare event to occur twice within a 24-Hour period. These events occurred because of ETC's inability to take Oxy's volume of gas and with with no gas takeaway occurring, field psi increased until set psi levels were reached which triggered flaring as a safety measure for operations, facility equipment, and personnel.
	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

*	
Steps taken to limit the duration and magnitude of vent or flare	sensor line pressure alarms, 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. In this case, third-party pipeline operator, ETC, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Red Bluff gas plant having problems with their plant equipment, which instigated an unexpected shutdown, prompting high sales line pressure to occur, which then triggered a flare event to occur twice within a 24-Hour period. Immediately upon flaring occurring, in both instances, the facility's mitigation optimizer cut injection rates to wells in the field to reduce injection rates and sales gas to return the pressure to below flare trigger setpoints of the CTB to cease flaring, which took time. All OXY operations and facility equipment were running at maximized optimization prior to the shutdown of ETC's downstream Red Bluff gas plant and their inability to take Oxy's volume of gas. This incident was completely out of Oxy's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event.
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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

V	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
V	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
✓	I hereby certify the statements in this amending 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.
V	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.
\overline{v}	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 Type:
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CONDITIONS

Created By	Condition	Condition Date
marialuna2	If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	6/8/2023