Atchafalaya Measurement Inc 416 East Main Street, Artesia NM 88210 575-746-3481

Sample Information

	Sample Information
Sample Name	OXY_Misty 4_GC2-21919-06
Station Number	14651T
Lease Name	Misty 4
Analysis For	OXY USA
Producer	OXY USA
Field Name	Misty
County/State	Eddy,NM
Frequency/Spot Sample	Quarterly
Sampling Method	Fill Empty
Sample Deg F	82.8
Atmos Deg F	65
Flow Rate	453.9763
Line PSIG	87.3
Date Sampled/Time Sampled	2-14-19
Cylinder Number	N/A
Cylinder Clean Date	N/A
Sampled By	Victor Urias
Analysis By	Pat Silvas
Verified/Calibrated Date	2-18-19
Report Date	2019-02-19 11:16:31

Component Results

Component Name	Ret. Time	Peak Area	Norm%	GPM (Dry) (Gal. / 1000 cu.ft.)
Nitrogen	22.880	32298.8	2.4037	0.000
H2S	0.000	0.0	0.0000	0.000
Methane	23.660	777719.9	76.6046	0.000
Carbon Dioxide	27.620	2827.4	0.1802	0.000
Ethane	37.080	204401.8	12.1870	3.252
Propane	77.780	114768.3	5.1711	1.422
i-Butane	29.780	50489.1	0.6204	0.203
n-Butane	32.080	119578.0	1.4582	0.459
i-Pentane	39.100	33139.5	0.3513	0.128
n-Pentane	41.900	36104.3	0.3725	0.135
C6's	50.750	29339.0	0.2663	0.109
C7's	67.000	31538.0	0.2756	0.127
C8's	84.000	10015.0	0.0933	0.048
C9's	102.000	3852.0	0.0129	0.007
C10 Plus	146.000	771.0	0.0029	0.002
Total:			100.0000	5.891

Results Summary

Result	Dry	Sat. (Base)
Total Raw Mole% (Dry)	100.6904	
Pressure Base (psia)	14.650	
Temperature Base	60.00	
Gross Heating Value (BTU / Ideal cu.ft.)	1247.1	1225.3
Gross Heating Value (BTU / Real cu.ft.)	1251.6	1230.2
Relative Density (G), Ideal	0.7372	0.7351
Relative Density (G), Real	0.7395	0.7378
Compressibility (Z) Factor	0.9964	0.9960

UPSET EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Misty Ivore CTB Date: 08/18/2021

Duration of event: 5 Hours 45 minutes **MCF Flared:** 273.8

Start Time: 02:30 PM End Time: 08:15 PM

Cause: Downstream Activity > Enterprise > Equipment Issues & Line Pressure Spikes

Method of Flared Gas Measurement: Gas Flare Meter

Well API Associated with Facility: 30-015-41413 Misty 35 Federal Com 4H

Comments: This upset event was not caused by any wells associated with the facility. This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable issue that was beyond the owner/operator's control, and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices.

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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible.

In this case, Enterprise was having problems with their Shugart compressor and having high line pressure spikes which impacted Oxy's ability to send gas to their downstream facility. As a result of Enterprise having compression equipment problems as well as high line pressure spikes, they were unable to handle the gas loads sent to them which prompted Enterprise to restrict their pipeline to Oxy. These problems occurred downstream of OXY's custody transfer point and out of OXY's control. Enterprise personnel did communicate to Oxy production techs that they were going resolve their issues within a few hours, but the line pressure would not decrease, and they were having constant pressure spikes. Until Enterprise was able to handle the volume of gas sent to them, the spikes in line pressure forced Oxy's upstream facility to route all its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline due to the restrictions placed. Enterprise did not provide advance notice of impending downstream activity impacting Oxy's upstream facility.

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

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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible.

This facility is an unmanned location yet internal OXY procedures ensure that upon compressor or facility shutdown, production techs are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. Upon arrival, production techs must assess whether compressor or facility shutdown is due to damage and repair is needed, or whether there are other reasons. In this case, Oxy production techs, upon arrival to the facility, and inspecting the equipment, determined that the cause of the flaring was an unexpected and reasonably unforeseeable pipeline restriction on the third party operated Enterprise's pipeline, which is downstream of OXY's custody point and control to avoid or prevent from happening. Oxy personnel immediately contacted Enterprise personnel who indicated that they were having several issues with equipment and high line pressure spikes necessitating the restriction of their pipeline to Oxy. Enterprise personnel did communicate to Oxy production techs that they were going resolve their issues within a few hours, but the line pressure would not decrease, and they were having constant pressure spikes. Until Enterprise was able to handle the volume of gas sent to them, the spikes in line pressure forced Oxy's upstream facility to route all its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline due to the restrictions placed. In an effort to minimize emissions and until Enterprise resolved their issues with their equipment and their line pressure spikes, OXY production techs began shutting in production to cease flaring. All OXY compressor equipment was running at maximized optimization, but Enterprise's facility was struggling to keep up with our production due to their downstream facility and pipeline issues. Oxy personnel were not provided advance notification of an impending shut-in or restriction of its gas system due to Enterprises downstream issues.

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

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise having facility and/or equipment issues, which is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening and/or reoccur. Enterprise's downstream facility issues will re-occur 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 Enterprise's downstream facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then initiates Oxy to route all of its stranded gas not pushed into the Enterprise 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 Enterprise personnel during these types of circumstances.

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 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

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**

QUESTIONS

Action 46300

QUESTIONS

Operator:	OGRID:
OXY USA WTP LIMITED PARTNERSHIP	192463
P.O. Box 4294	Action Number:
Houston, TX 772104294	46300
	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 t	hese issues before continuing with the rest of the questions.		
Incident Well	[30-015-41413] MISTY 35 FEDERAL COM #004H		
Incident Facility	Not answered.		

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 or is this venting and/or flaring caused by an emergency or malfunction	Yes		
Did or will this venting and/or flaring last eight hours or more cumulatively within any 24-hour period from a single event	No		
Is this considered a submission for a notification of a major venting and/or flaring	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 or will there be at least 50 MCF of natural gas vented and/or flared during this event	Yes		
Did this venting and/or flaring 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 venting and/or flaring 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 > Enterprise > Equipment Issues & Line Pressure Spikes	

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 (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 required 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.		

Date(s) and Time(s)		
Date venting and/or flaring was discovered or commenced	08/18/2021	
Time venting and/or flaring was discovered or commenced	05:20 AM	
Time venting and/or flaring was terminated	10:30 AM	
Cumulative hours during this event	5	

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: 274 Mcf Recovered: 0 Mcf Lost: 274 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 or is this venting and/or flaring a result of downstream activity	Yes	
Date notified of downstream activity requiring this venting and/or flaring	08/18/2021	
Time notified of downstream activity requiring this venting and/or flaring 05:35 AM		

steps and Actions to Prevent Waste		
For this event, the operator could not have reasonably anticipated the current event and it was beyond the operator's control.	True	
Please explain reason for why this event was beyond your operator's control	See Justification Form > 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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible.	
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > 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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible.	
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise having facility and/or equipment issues, which is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening and/or reoccur. Enterprise's downstream facility issues will re-occur 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 Enterprise's downstream facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then initiates Oxy to route all of its stranded gas not pushed into the Enterprise 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 Enterprise personnel during these types of circumstances.	

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CONDITIONS

Action 46300

CONDITIONS

Operator:	OGRID:
OXY USA WTP LIMITED PARTNERSHIP	192463
P.O. Box 4294	Action Number:
Houston, TX 772104294	46300
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
marialuna	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.	9/2/2021