UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Red Tank 19 CTB

Flare Date: 09/22/2021

Duration of event: 1 Hour 30 minutes

MCF Flared: 234

Start Time: 06:10 PM

End Time: 07:40 PM

Cause: Downstream Activity Issue > DCP > DCP Linam Ranch

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This upset event was not caused by any wells associated with the facility. 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.

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 gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible.

In this case, OXY was not provided with advance notice from DCP or DCP Linam Ranch that they were having issues at their facilities or that a resulting shut-in of the gas service pipeline would occur. DCP Linam Ranch gas plant was experiencing souring issues within their gas system, which caused them to reduce their gas intake volume. As a result of the reduction in the gas intake volume from the DCP Linam Ranch gas plant, DCP Bootleg Booster Station also had facility issues. DCP compressed as much gas as possible until their own facility compressors shut down on high discharge, which in turn, caused DCP to totally shut-in their gas pipeline to OXY. This situation was out of OXY's control but OXY made every effort to control and minimize emissions as much as possible while DCP & DCP Linam Ranch was down and shut in. All OXY compression equipment was running at maximized capacity until no longer able to do so because of a total shut-in from DCP & DCP Linam Ranch. OXY routed its stranded gas to flare until DCP/Linam Ranch was able to resume normal working operations but also routed some of the sales gas to another gas purchased, to minimize excess emissions.

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 part of the steps taken to limit duration and magnitude of flaring. In this case, the unexpected shutdown of third-party pipeline operator DCP's gas service pipeline, caused by issues at their DCP Linam Ranch and DCP Bootleg Station greatly impacted the gas flow from Oxy's upstream facility to their gas service pipeline and causing an immediate spike in high line pressure in their pipeline, which triggered a flaring event at Oxy's upstream facility. Until DCP and their associating downstream facilities were able to take the volume of gas sent to them, the spike 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. All OXY compression equipment was running at maximized capacity until no longer able to do so because of a total shut-in from DCP and its associating facilities. OXY routed its stranded gas to flare until DCP was able to resume normal working operations but also routed some of its gas to another gas purchaser, to minimize excess emissions. Additionally, Oxy production techs shut in multiple high GOR wells to minimize gas flaring volumes during this third-party pipeline operator gas service pipeline shut in.

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

Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of a DCP gas service system 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 or prevent from happening or reoccurring. DCP'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 DCP's downstream facility and/or its associating downstream facilities has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, DCP then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the DCP gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The limited reactive actions that Oxy can do in this circumstance is to shut in multiple high GOR wells to minimize gas throughput in order to match and reduce flaring volumes during this third-party pipeline operator gas service pipeline shut in.

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District I
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
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

QUESTIONS

Action 53232

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 53232
	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	**[fAPP2127031815] RED TANK 19 CTB**

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 venting and/or flaring 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 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 Issue > DCP > DCP Linam Ranch

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	73
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	5
Carbon Dioxide (C02) percentage, if greater than one percent	3
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	09/22/2021
Time venting and/or flaring was discovered or commenced	06:10 PM
Time venting and/or flaring was terminated	07:40 PM
Cumulative hours during this event	2

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: 234 Mcf | Recovered: 0 Mcf | Lost: 234 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	*Not answered.*
Was notification of downstream activity received by you or your operator	*Not answered.*
Downstream OGRID that should have notified you or your operator	*Not answered.*
Date notified of downstream activity requiring this venting and/or flaring	*Not answered.*
Time notified of downstream activity requiring this venting and/or flaring	*Not answered.*

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	In this case, OXY was not provided with advance notice from DCP or DCP Linam Ranch that they were having issues at their facilities or that a resulting shut-in of the gas service pipeline would occur. DCP Linam Ranch gas plant was experiencing souring issues within their gas system, which caused them to reduce their gas intake volume. As a result of the reduction in the gas intake volume from the DCP Linam Ranch gas plant, DCP Bootleg Booster Station also had facility issues. DCP compressed as much gas as possible until their own facility compressors shut down on high discharge, which in turn, caused DCP to totally shut-in their gas pipeline to OXY. This situation was out of OXY's control but OXY made every effort to control and minimize emissions as much as possible while DCP & DCP Linam Ranch was down and shut in. All OXY compression equipment was running at maximized capacity until no longer able to do so because of a total shut-in from DCP & DCP Linam Ranch. OXY routed its stranded gas to flare until DCP/Linam Ranch was able to resume normal working operations but also routed some of the sales gas to another gas purchased, to minimize excess emissions.
Steps taken to limit the duration and magnitude of venting and/or flaring	It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as part of the steps taken to limit duration and magnitude of flaring. In this case, the unexpected shutdown of third-party pipeline operator DCP's gas service pipeline, caused by issues at their DCP Linam Ranch and DCP Bootleg Station greatly impacted the gas flow from Oxy's upstream facility to their gas service pipeline and causing an immediate spike in high line pressure in their pipeline, which triggered a flaring event at Oxy's upstream facility. Until DCP and their associating downstream facilities were able to take the volume of gas sent to them, the spike 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. All OXY compression equipment was running at maximized capacity until no longer able to do so because of a total shut-in from DCP and its associating facilities. OXY routed its stranded gas to flare until DCP was able to resume normal working operations but also routed some of its gas to another gas purchaser, to minimize excess emissions. Additionally, Oxy production techs shut in multiple high GOR wells to minimize gas flaring volumes during this third-party pipeline operator gas service pipeline shut in.
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OXY USA INC P.O. Box 4294 Houston, TX 772104294	16696
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	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.	9/30/2021