

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

Sample Information

	Sample Information
Sample Name	OXY__Burton Flats CTB Production__GC2-73019-12
Station Number	14071P
Lease Name	Burton Flats CTB Production
Analysis For	OXY USA
Producer	OXY USA
Field Name	Burton Flats
County/State	N/A
Frequency/Spot Sample	Spot
Sampling Method	Fill Empty
Sample Deg F	97
Atmos Deg F	79
Flow Rate	153.142
Line PSIG	48
Date Sampled/Time Sampled	7-23-19
Cylinder Number	N/A
Cylinder Clean Date	N/A
Sampled By	Derek Sauder
Analysis By	Pat Silvas
Verified/Calibrated Date	7-29-19
Report Date	2019-07-30 10:46:10

Component Results

Component Name	Ret. Time	Peak Area	Norm%	GPM (Dry) (Gal. / 1000 cu.ft.)
Nitrogen	23.100	30269.9	2.1819	0.000
H2S	0.000	0.0	0.0000	0.000
Methane	23.860	787502.9	75.1296	0.000
Carbon Dioxide	27.900	5825.9	0.3597	0.000
Ethane	36.960	202456.6	11.6915	3.121
Propane	77.160	133263.6	5.8157	1.600
i-Butane	29.820	64807.6	0.7713	0.252
n-Butane	32.080	165504.2	1.9549	0.615
i-Pentane	39.120	49926.9	0.5126	0.187
n-Pentane	41.900	54913.2	0.5487	0.199
C6's	50.750	43911.0	0.3860	0.158
C7's	67.000	54984.0	0.4654	0.214
C8's	84.000	18044.0	0.1628	0.083
C9's	102.000	4888.0	0.0159	0.009
C10 Plus	146.000	1090.0	0.0040	0.002
Total:			100.0000	6.441

Results Summary

Result	Dry	Sat. (Base)
Total Raw Mole% (Dry)	103.9585	
Pressure Base (psia)	14.650	
Temperature Base	60.00	
Gross Heating Value (BTU / Ideal cu.ft.)	1294.9	1272.2
Gross Heating Value (BTU / Real cu.ft.)	1300.1	1277.9
Relative Density (G), Ideal	0.7687	0.7661
Relative Density (G), Real	0.7715	0.7692
Compressibility (Z) Factor	0.9960	0.9956

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Burton Flats CTB**Date:** 12/27/2021**Duration of event:** 4 Hours**MCF Flared:** 135**Start Time:** 12:00 AM**End Time:** 04:00 AM**Cause:** Downstream Activity Issue > Enterprise > Sales Gas System Pipeline Issues**Method of Flared Gas Measurement:** Gas Flare Meter

Comments: This emissions event was caused by the unforeseen, unexpected, sudden, and 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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

In this case, third-party downstream pipeline operator Enterprise's sales gas system pipeline impacted Oxy's ability to send its gas to them, as Enterprise's had hydrates issues within their pipeline which in turn continually caused recurring spikes in line pressure triggering the Burton Flats CTB's compressor unit to unexpectedly malfunction on high discharge pressure and shut down. As a result of these sudden and unexpected compressor malfunctions caused by Enterprises high line pressure spikes, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas sales service system pipeline. No advance warning was provided to Oxy personnel from Enterprise regarding issues with their gas sales system pipeline or issues with their downstream facility.

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 alarms, increased sensor 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, it was determined that the cause of the facility's compressor malfunction alarms was due to Enterprise's gas sales service system pipeline having hydrates within their pipeline, which in turn continually caused recurring spikes in their line pressure triggering the Burton Flats CTB's compressor unit to unexpectedly malfunction on high discharge pressure and shut down. The on-call Oxy production tech, who received the facility compressor alarm notifications, drove to the facility to inspect the facility and the equipment before contacting Enterprise personnel to determine cause. Once cause was established due to Enterprise having hydrates in their sales pipeline, the on-call Oxy production tech began to quickly shut-in multiple high GOR wells to minimize gas throughput at the Burton Flats CTB to minimize flaring. Once Enterprise's downstream facility

resumed normal working operations and began full gas sales pipeline service once again, did flaring cease. This incident was completely out of OXY's control to prevent from happening OXY made every effort to control and minimize emissions as much as possible during this event by working safely and diligently to resolve the issues.

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 an Enterprise 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 or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route 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 during these circumstances. The limited actions that Oxy can do in this circumstance is to shut in multiple high GOR wells to minimize flaring volumes during these third-party pipeline operator downstream activity restrictions and/or shut ins.

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District II
811 S. First St., Artesia, NM 88210
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District III
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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 71833

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 71833
	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: • 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 71833

QUESTIONS

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	Action Number: 71833
	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	[fAPP2126552654] BURTON FLATS FED 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 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 > Enterprise > Sales Gas System Pipeline 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	75
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

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QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/27/2021
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	04:00 AM
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: 135 Mcf Recovered: 0 Mcf Lost: 135 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	[713731] Enterprise Crude Pipeline LLC
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	In this case, third-party downstream pipeline operator Enterprise's sales gas system pipeline impacted Oxy's ability to send its gas to them, as Enterprise's had hydrates issues within their pipeline which in turn continually caused recurring spikes in line pressure triggering the Burton Flats CTB's compressor unit to unexpectedly malfunction on high discharge pressure and shut down. As a result of these sudden and unexpected compressor malfunctions caused by Enterprises high line pressure spikes, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas sales service system pipeline. No advance warning was provided to Oxy personnel from Enterprise regarding issues with their gas sales system pipeline or issues with their downstream facility.
Steps taken to limit the duration and magnitude of vent or flare	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 alarms, increased sensor 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, it was determined that the cause of the facility's compressor malfunction alarms was due to Enterprise's gas sales service system pipeline having hydrates within their pipeline, which in turn continually caused recurring spikes in their line pressure triggering the Burton Flats CTB's compressor unit to unexpectedly malfunction on high discharge pressure and shut down. The on-call Oxy production tech, who received the facility compressor alarm notifications, drove to the facility to inspect the facility and the equipment before contacting Enterprise personnel to determine cause. Once cause was established due to Enterprise having hydrates in their sales pipeline, the on-call Oxy production tech began to quickly shut-in multiple high GOR wells to minimize gas throughput at the Burton Flats CTB to minimize flaring. Once Enterprise's downstream facility resumed normal working operations and began full gas sales pipeline service once again, did flaring cease.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of an Enterprise 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 or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route 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 during these circumstances. The limited actions that Oxy can do in this circumstance is to shut in multiple high GOR wells to minimize flaring volumes during these third-party pipeline operator downstream activity restrictions and/or shut ins.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	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.
☒	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.
☒	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.
☒	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.
☒	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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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.	1/11/2022