Certificate of Analysis

Number: 6030-21090237-002A

Artesia Laboratory
200 E Main St.
Artesia, NM 88210
Phone 575-746-3481

Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Oct. 01, 2021

Field:	Turkey	Sampled By:	Michael Mirabal
Station Name:	Turkey Track CTB Check A	Sample Of:	Gas Spot
Station Number:	14670A	Sample Date:	09/24/2021 01:28
Station Location:	CTB	Sample Conditions:	72 psia, @ 89 °F Ambient: 85 °F
Sample Point:	Meter	Effective Date:	09/24/2021 01:28
Formation:	Monthly	Method:	GPA-2261M
County:	Eddy, NM	Cylinder No:	5030-04971
Type of Sample: :	Spot-Cylinder	Instrument:	6030_GC2 (Agilent GC-7890B)
Heat Trace Used:	N/A	Last Inst. Cal.:	09/13/2021 15:05 PM
Sampling Method: :	Fill and Purge	Analyzed:	09/29/2021 11:37:10 by KNF
Sampling Company: :	SPL		

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	6.181
Nitrogen	2.077	2.055	2.631		GPM TOTAL C3+	3.073
Methane	77.029	76.211	55.875		GPM TOTAL iC5+	0.815
Carbon Dioxide	0.226	0.224	0.451			
Ethane	11.768	11.643	16.000	3.108		
Propane	5.465	5.407	10.896	1.487		
Iso-butane	0.729	0.721	1.915	0.236		
n-Butane	1.719	1.701	4.518	0.535		
Iso-pentane	0.497	0.492	1.622	0.180		
n-Pentane	0.517	0.512	1.688	0.185		
Hexanes Plus	1.045	1.034	4.404	0.450		
	101.072	100.000	100.000	6.181		

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7581	3.2176
Calculated Molecular Weight	21.88	93.19
Compressibility Factor	0.9961	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1285	5113
Water Sat. Gas Base BTU	1263	5024
Ideal, Gross HV - Dry at 14.65 psia	1280.0	5113.2
Ideal, Gross HV - Wet	1257.6	5023.7
Net BTU Dry Gas - real gas	1167	
Net BTU Wet Gas - real gas	1147	

Comments: H2S Field Content 2.5 ppm
Mcf/day 186.55

Data reviewed by: Krystle Fitzwater, Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Turkey Track CTB **Flare Date:** 01/09/20222

Duration of event: 15 Minutes **MCF Flared:** 200

Start Time: 09:21 AM **End Time:** 09:36 AM

Cause: Extreme Freezing Weather Conditions > Gas Scrubber Issue > Compression Equipment Shutdown

Method of Flared Gas Measurement: Gas Flare Meter

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 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.

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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. Due to extreme freezing weather conditions, the fuel gas scrubber line froze causing a loss of fuel gas to all the gas lift compressors, which triggered a shutdown of the compression equipment. The line was winterized as part of Oxy's usual operations practices for extreme cold weather, by having it insulated and heat traced, yet the methanol pump failed overnight, which caused an ice plug to form and freezing the rest of the line.

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 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, the Oxy production tech, who was on-site, received the compression alarms indicating that the compressors had shut down on low fuel gas pressure. The Oxy production tech quickly cleared the ice plug from the line and was able to restart the gas lift compressors.

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

OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected flaring event. It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. The corrective measures taken was for the Oxy production tech to keep an eye on the line until Coastal Chemical came out to inspect and repair their methanol pump to ensure that this type of equipment failure does not occur. In addition, due to these extreme freezing conditions, Coast Chemical has been asked to do more frequent checks on their methanol pumps.

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District IV
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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

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 75179
	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 75179

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 75179
	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	**[fAPP2126265645] TURKEY TRACK 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 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	*Not answered.*
Additional details for Equipment Involved. Please specify	Emergency Flare > Extreme Freezing Weather Conditions > Gas Scrubber Issue > Compression Equipment Shutdown

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	76
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	2
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.*

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QUESTIONS (continued)

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 75179
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	01/09/2022
Time vent or flare was discovered or commenced	09:21 AM
Time vent or flare was terminated	09:36 AM
Cumulative hours during this event	0

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: 200 Mcf | Recovered: 0 Mcf | Lost: 200 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	No
Was notification of downstream activity received by this operator	*Not answered.*
Downstream OGRID that should have notified this operator	*Not answered.*
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. Due to extreme freezing weather conditions, the fuel gas scrubber line froze causing a loss of fuel gas to all the gas lift compressors, which triggered a shutdown of the compression equipment. The line was winterized as part of Oxy's usual operations practices for extreme cold weather, by having it insulated and heat traced, yet the methanol pump failed overnight, which caused an ice plug to form and freezing the rest of the line.
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, 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, the Oxy production tech, who was on-site, received the compression alarms indicating that the compressors had shut down on low fuel gas pressure. The Oxy production tech quickly cleared the ice plug from the line and was able to restart the gas lift compressors.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected flaring event. It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. The corrective measures taken was for the Oxy production tech to keep an eye on the line until Coastal Chemical came out to inspect and repair their methanol pump to ensure that this type of equipment failure does not occur. In addition, due to these extreme freezing conditions, Coast Chemical has been asked to do more frequent checks on their methanol pumps.

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ACKNOWLEDGMENTS

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	Action Number: 75179
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	I acknowledge that I am authorized to submit a *Venting and/or Flaring* (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

Action 75179

CONDITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 75179
	Action Type: [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.	1/25/2022