



## Certificate of Analysis

Number: 6030-22030204-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Mar. 14, 2022

Field: Turkey Track  
Station Name: Turkey Track CTB Sales Check  
Station Number: 14670c  
Sample Point: Meter  
Meter Number:  
County: Eddy  
Type of Sample: Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: Fill and Purge  
Sampling Company: OXY

Sampled By: Michael Mirabal  
Sample Of: Gas Spot  
Sample Date: 03/10/2022 01:30  
Sample Conditions: 700 psig, @ 94 °F Ambient: 48 °F  
Effective Date: 03/10/2022 01:30  
Method: GPA-2261M  
Cylinder No: 1111-007242  
Instrument: 70142339 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 03/14/2022 0:00 AM  
Analyzed: 03/14/2022 11:13:54 by ERG

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.885
Nitrogen	2.063	2.067	2.716		GPM TOTAL C3+	2.745
Methane	76.682	76.849	57.818		GPM TOTAL iC5+	0.478
Carbon Dioxide	0.216	0.216	0.446			
Ethane	11.740	11.766	16.592	3.140		
Propane	5.541	5.553	11.484	1.527		
Iso-butane	0.686	0.687	1.873	0.224		
n-Butane	1.637	1.641	4.473	0.516		
Iso-pentane	0.369	0.370	1.252	0.135		
n-Pentane	0.377	0.378	1.279	0.137		
Hexanes Plus	0.472	0.473	2.067	0.206		
	99.783	100.000	100.000	5.885		

## Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7386	3.2176
Calculated Molecular Weight	21.32	93.19
Compressibility Factor	0.9964	

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1255	5113
Water Sat. Gas Base BTU	1233	5024
Ideal, Gross HV - Dry at 14.65 psia	1250.3	5113.2
Ideal, Gross HV - Wet	1228.4	5023.7
Net BTU Dry Gas - real gas	1139	
Net BTU Wet Gas - real gas	1119	

Comments: H<sub>2</sub>S Field Content 0 ppm  
Mcf/day 9365

Hydrocarbon 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:** 12-17-2022**Duration of event:** 2 Hours 30 Minutes**MCF Flared:** 310**Start Time:** 12:30 AM**End Time:** 03:00 AM**Cause:** Compression Equipment > Weather Related > Malfunctions > Spillover valve freezing up**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

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. In this case, this flaring event at the Turkey Track CTB was triggered by sudden and unexpected freezing issues with spillover valve. Valve froze and would not open to relieve pressure to sales line. This caused compression to go down on high pressure. Compressor engines are designed to operate in a precise manner and when any type of malfunction occurs, it disrupts the gas lift compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. This facility was unmanned, so as soon as field production technician personnel in the area or associating Oxy facilities received compressor malfunction alarms, they are instructed to head to the facility to determine cause and resolve the issues, if possible. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.

**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 field production technician personnel 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, this flaring event at the Turkey Track CTB was triggered by sudden and unexpected freezing issues with spillover valve. Valve froze and would not open to relieve pressure to sales line. This caused compression to go down on high pressure. Compressor engines are designed to operate in a precise manner and when any type of malfunction occurs, it disrupts the gas lift compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. This facility was unmanned, so as soon as field production technician personnel in the area or associating Oxy facilities received compressor malfunction alarms, they are instructed to head to

the facility to determine cause and resolve the issues, if possible. Production Technician arrived at location and began troubleshooting and found that valve was not opening. He then tried to reduce flaring by sending gas to another third party. They were unable to receive gas at the time. Production technician then began to shut in wells until valve was able to be in thawed and compression could be restarted. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.

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

Oxy is limited in its ability to take any corrective actions to eliminate the cause and potential reoccurrence of Valve malfunctions. However Oxy has added heat trace and added more insulation to keep valve from freezing up. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its equipment preventative maintenance program for this facility.

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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

Action 177755

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 177755
	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: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul>
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QUESTIONS

Action 177755

**QUESTIONS**

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 177755
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b> <i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident Well	Unavailable.
Incident Facility	[fAPP2126265645] TURKEY TRACK CTB

<b>Determination of Reporting Requirements</b> <i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
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.
<i>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.</i>	
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 <b>ANY</b> 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

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Not answered.

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b> <i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	77
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
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
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

Action 177755

QUESTIONS (continued)

Operator:  OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID:  192463
	Action Number:  177755
	Action Type:  [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/17/2022
Time vent or flare was discovered or commenced	12:30 AM
Time vent or flare was terminated	03:00 AM
Cumulative hours during this event	3

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: 310 Mcf   Recovered: 0 Mcf   Lost: 310 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	<p>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. In this case, this flaring event at the Turkey Track CTB was triggered by sudden and unexpected freezing issues with spillover valve. Valve froze and would not open to relieve pressure to sales line. This caused compression to go down on high pressure. Compressor engines are designed to operate in a precise manner and when any type of malfunction occurs, it disrupts the gas lift compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. This facility was unmanned, so as soon as field production technician personnel in the area or associating Oxy facilities received compressor malfunction alarms, they are instructed to head to the facility to determine cause and resolve the issues, if possible. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.</p>
Steps taken to limit the duration and magnitude of vent or flare	<p>In this case, this flaring event at the Turkey Track CTB was triggered by sudden and unexpected freezing issues with spillover valve. Valve froze and would not open to relieve pressure to sales line. This caused compression to go down on high pressure. Compressor engines are designed to operate in a precise manner and when any type of malfunction occurs, it disrupts the gas lift compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. This facility was unmanned, so as soon as field production technician personnel in the area or associating Oxy facilities received compressor malfunction alarms, they are instructed to head to the facility to determine cause and resolve the issues, if possible. Production Technician arrived at location and began troubleshooting and found that valve was not opening. He then tried to reduce flaring by sending gas to another third party. They were unable to receive gas at the time. Production technician then began to shut in wells until valve was able to be in thawed and compression could be restarted. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.</p>
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	<p>Oxy is limited in its ability to take any corrective actions to eliminate the cause and potential reoccurrence of Valve malfunctions. However Oxy has added heat trace and added more insulation to keep valve from freezing up. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its equipment preventative maintenance program for this facility.</p>

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ACKNOWLEDGMENTS

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**ACKNOWLEDGMENTS**

<input checked="" type="checkbox"/>	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 <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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 Number: 177755
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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.	1/20/2023