



Certificate of Analysis

Number: 6030-22030597-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Apr. 04, 2022

Field: Sand Dunes
Station Name: Sand Dunes SCE CGL
Station Number:
Sample Point: Outlet of Fuel Skid
Meter Number: 4000558766
County: Eddy
Type of Sample: Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: Fill and Purge
Sampling Company: OXY

Sampled By: Scott Beasley
Sample Of: Gas Spot
Sample Date: 03/31/2022 12:26
Sample Conditions: 156.2 psig, @ 60 °F Ambient: 65 °F
Effective Date: 03/31/2022 12:26
Method: GPA-2261M
Cylinder No: 1111-003929
Instrument: 6030_GC6 (Inficon GC-3000 Micro)
Last Inst. Cal.: 04/04/2022 0:00 AM
Analyzed: 04/04/2022 12:26:38 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+	5.488
Nitrogen	1.418	1.443	1.917		GPM TOTAL C3+	2.616
Methane	77.513	78.856	59.992		GPM TOTAL iC5+	0.585
Carbon Dioxide	0.409	0.416	0.868			
Ethane	10.577	10.760	15.343	2.872		
Propane	4.877	4.962	10.376	1.364		
Iso-butane	0.583	0.593	1.634	0.194		
n-Butane	1.476	1.502	4.140	0.473		
Iso-pentane	0.341	0.347	1.187	0.127		
n-Pentane	0.405	0.412	1.410	0.149		
Hexanes Plus	0.697	0.709	3.133	0.309		
	98.296	100.000	100.000	5.488		

Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7304	3.2176
Calculated Molecular Weight	21.09	93.19
Compressibility Factor	0.9964	

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1247	5113
Water Sat. Gas Base BTU	1226	5024
Ideal, Gross HV - Dry at 14.65 psia	1242.9	5113.2
Ideal, Gross HV - Wet	1221.1	5023.7
Net BTU Dry Gas - real gas	1132	
Net BTU Wet Gas - real gas	1112	

Comments: H2S Field Content 0 ppm

Hydrocarbon Laboratory Manager

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

VCU FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Sand Dunes SCE CGL**Date:** 12/13/2022**Duration of event:** >8 hours/day**MCF Flared:** 49.9**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Routine Combustion of storage tank vapors using an enclosed combustion device (VCU)**Method of Flared Gas Measurement:** SC EAST CGL VCU 151651 tracking combusted gas

Comments: No wells were involved with this flaring event as this event is due to combustion of storage tank vapors by an enclosed combustion device which is used routinely at this facility, pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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

On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

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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

DEFINITIONS

Action 177941

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 177941
	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 177941

QUESTIONS

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	Action Number: 177941
	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	Unavailable.
Incident Facility	[fAPP2127226207] SAND DUNES SC EAST CGL COMP STATION

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	No
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	Yes
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 within 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	SC EAST CGL VCU 151651 tracking combusted gas - No wells were involved with this flaring event as this event is due to combustion of storage tank vapors by an enclosed combustion device which is used routinely at this facility, pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.

Representative Compositional Analysis of Vented or Flared Natural Gas

Please provide the mole percent for the percentage questions in this group.

Methane (CH4) percentage	79
Nitrogen (N2) percentage, if greater than one percent	1
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

Action 177941

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/13/2022
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	24

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: 50 Mcf Recovered: 0 Mcf Lost: 50 Mcf.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	SC EAST CGL VCU 151651 tracking combusted gas
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	On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Combustion of storage tank vapors by this enclosed combustion device is used routinely at this facility pursuant to Federal US EPA NSPS OOOO/OOOOa regulations and state air permitting requirements that require the use of such a device to reduce storage tank emissions by 95%.
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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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	Action Number: 177941
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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