



Certificate of Analysis

Number: 6030-22090406-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Sep. 28, 2022

Field: Red Tank
Station Name: Red Tank 27-28 CTB Check
Station Number: 16200C
Station Location: CTB
Sample Point: Meter run
Formation: Monthly
County: Eddy, NM
Type of Sample: : Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Raul Salazar
Sample Of: Gas Spot
Sample Date: 09/26/2022
Sample Conditions: 80 psig, @ 95.05 °F Ambient: 89 °F
Effective Date: 09/26/2022
PO/Ref. No: 4500934807
Method: GPA-2261M
Cylinder No: 1111-006946
Instrument: 70104251 (Inficon GC-MicroFusion)
Last Inst. Cal.: 09/20/2022 0:00 AM
Analyzed: 09/28/2022 14:19:37 by EBH

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	0.00050	0.001	
Nitrogen	1.994	1.99935	2.435	
Carbon Dioxide	2.141	2.14646	4.107	
Methane	71.991	72.19178	50.350	
Ethane	12.011	12.04395	15.744	3.216
Propane	6.716	6.73490	12.911	1.853
Iso-Butane	0.852	0.85457	2.159	0.279
n-Butane	2.185	2.19098	5.536	0.690
Iso-Pentane	0.463	0.46419	1.456	0.170
n-Pentane	0.527	0.52807	1.656	0.191
Hexanes	0.322	0.32240	1.208	0.132
Heptanes	0.302	0.30314	1.321	0.140
Octanes	0.178	0.17860	0.887	0.091
Nonanes Plus	0.041	0.04111	0.229	0.023
	99.723	100.0000	100.000	6.785

Calculated Physical Properties

Calculated Molecular Weight	Total	C9+
Compressibility Factor	23.00	128.26
Relative Density Real Gas	0.9958	
	0.7972	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1298.1	6974.4
Water Sat. Gas Base BTU	1276.0	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1292.7	6974.4
Ideal, Gross HV - Wet	1270.1	6852.4

Comments: H₂S Field Content 5 ppm

Hydrocarbon Laboratory Manager

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

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Red Tank 27-28**Date:** 12/23/2022**Duration of event:** 4 Hours 30 Minutes**MCF Vented:** 58.80**Start Time:** 12:00 PM**End Time:** 04:30 PM**Cause:** Venting > VRU > Malfunctions > Repairs**Method of Gas Measurement:** Estimated Vent Calculations**Comments:**

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

The 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Hy-Bon to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Hy-Bon technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service.

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no equipment issues, circumstances and/or assist other personnel on-site for maintenance/operational purposes. It is OXY's policy to route all stranded sales gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible, as part of the overall process or steps to take to limit duration and magnitude of venting. When flaring is not possible, and venting occurs and/or is discovered, 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. The 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Hy-Bon to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Hy-Bon technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service. This incident was completely

out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working quickly, safely and diligently.

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

Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of venting from vapor recovery units as notwithstanding proper VRU design and operation, various forms of mechanical, electrical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause venting malfunctions to occur without warning or advance notice. 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 continue with its equipment preventative maintenance program for all its facilities and continually work with its automation team to resolve equipment issues in a timely manner, should they occur suddenly and without warning.

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Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
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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 166290

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 166290
	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">• 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 166290

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:	16696
	Action Number:	166290
	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	[fAPP2127030589] RED TANK 27-28 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 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	Vented > VRU > Malfunctions > Repairs

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	72
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	2
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 166290

QUESTIONS (continued)

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	Action Number: 166290
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/24/2022
Time vent or flare was discovered or commenced	12:00 PM
Time vent or flare was terminated	04:30 PM
Cumulative hours during this event	5

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other Other (Specify) Natural Gas Vented Released: 59 Mcf Recovered: 0 Mcf Lost: 59 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
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	The 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Hy-Bon to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Hy-Bon technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no equipment issues, circumstances and/or assist other personnel on-site for maintenance/operational purposes. It is OXY's policy to route all stranded sales gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible, as part of the overall process or steps to take to limit duration and magnitude of venting. When flaring is not possible, and venting occurs and/or is discovered, 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. The 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Hy-Bon to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Hy-Bon technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service. This incident was completely out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working quickly, safely
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ACKNOWLEDGMENTS

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

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 complete 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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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.	1/30/2023