



Natural Gas Analysis Report

GPA 2172-09/API 14.5 Report with GPA 2145-16 Physical Properties

Sample Information	
Sample Name	SAND DUNES SC WEST CGL FUEL INLET
Technician	ANTHONY DOMINGUEZ
Analyzer Make & Model	INFICON MICRO GC
Last Calibration/Validation Date	03-02-2023
Meter Number	NA
Air temperature	55
Flow Rate (MCF/Day)	0
Heat Tracing	HEATED HOSE & GASIFIER
Sample description/mtr name	SAND DUNES SC WEST CGL FUEL INLET
Sampling Method	FILL & EMPTY
Operator	OCCIDENTAL PETROLEUM
State	NEW MEXICO
Region Name	PERMIAN_RESOURCES
Asset	NEW MEXICO
System	EAST
FLOC	NA
Sample Sub Type	NA
Sample Name Type	NA
Vendor	AKM MEASUREMENT
Cylinder #	2439
Sampled by	JONATHAN ALDRICH
Sample date	3-2-2023
Analyzed date	3-7-2023
Method Name	C9
Injection Date	2023-03-07 13:04:23
Report Date	2023-03-07 13:08:01
EZReporter Configuration File	1-16-2023 OXY GPA C9+ H2S #2.cfgx
Source Data File	90db9d4d-df34-4d71-9d1e-e22c5b8eb97b
NGA Phys. Property Data Source	GPA Standard 2145-16 (FPS)
Data Source	INFICON Fusion Connector

Component Results

Component Name	Peak Area	Raw Amount	Response Factor	Norm Mole%	Gross HV (Dry) (BTU / Ideal cu.ft.)	Relative Gas Density (Dry)	GPM (Dry) (Gal. / 1000 cu.ft.)
Nitrogen	28265.3	1.5930	0.00005636	1.5925	0.0	0.01540	0.176
Methane	1033024.5	75.6853	0.00007327	75.6598	765.9	0.41908	12.870
CO2	31411.3	1.4845	0.00004726	1.4840	0.0	0.02255	0.254
Ethane	262009.7	11.9232	0.00004551	11.9192	211.4	0.12375	3.199
H2S	0.0	0.0000	0.00000000	0.0000	0.0	0.00000	0.000
Propane	184709.2	6.0526	0.00003277	6.0506	152.6	0.09212	1.673
iso-butane	67412.4	0.7492	0.00001111	0.7490	24.4	0.01503	0.246
n-Butane	157395.3	1.7289	0.00001098	1.7283	56.5	0.03468	0.547
iso-pentane	32107.2	0.3119	0.00000971	0.3118	12.5	0.00777	0.114
n-Pentane	33154.7	0.3139	0.00000947	0.3138	12.6	0.00782	0.114
hexanes	15796.0	0.1200	0.00000760	0.1200	5.7	0.00357	0.050
heptanes	9134.0	0.0570	0.00000624	0.0570	3.1	0.00197	0.026
octanes	2339.0	0.0130	0.00000558	0.0130	0.8	0.00051	0.007
nonanes+	169.0	0.0010	0.00000619	0.0010	0.1	0.00004	0.001
Total:		100.0338		100.0000	1245.7	0.74430	19.276

Results Summary

Result	Dry	Sat.
Total Un-Normalized Mole%	100.0338	
Pressure Base (psia)	14.730	
Temperature Base (Deg. F)	60.00	
Flowing Temperature (Deg. F)	0.0	
Flowing Temperature (Deg. F)	1267.0	

Result	Dry	Sat.
Gross Heating Value (BTU / Ideal cu.ft.)	1245.7	1224.0
Gross Heating Value (BTU / Real cu.ft.)	1250.3	1229.0
Relative Density (G), Real	0.7467	0.7449

### Monitored Parameter Report

Parameter	Value	Lower Limit	Upper Limit	Status
Total un-normalized amount	100.0338	97.0000	103.0000	Pass

### VCU FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

**Facility:** Sand Dunes SCW CGL

**Date:** 07/22/2023

**Duration of event:** >8 hours/day

**MCF Flared:** 74.3

**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 WEST CGL VCU 151650 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%.

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#### 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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**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 247882

**DEFINITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 247882
	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 247882

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 247882
	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	[fAPP2127225906] SAND DUNES SC WEST CGL COMP STATION

<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	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.
<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 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

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	SC WEST CGL VCU 151650 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%.

<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	76
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	1
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 (continued)**

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**QUESTIONS**

<b>Date(s) and Time(s)</b>	
Date vent or flare was discovered or commenced	07/22/2023
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

<b>Measured or Estimated Volume of Vented or Flared Natural Gas</b>	
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 74 Mcf   Recovered: 0 Mcf   Lost: 74 Mcf.
Other Released Details	<i>Not answered.</i>
Additional details for Measured or Estimated Volume(s). Please specify	SC WEST CGL VCU 151650 tracking combusted gas
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>Yes, according to supplied volumes this appears to be a "gas only" report.</b>

<b>Venting or Flaring Resulting from Downstream Activity</b>	
Was this vent or flare a result of downstream activity	No
Was notification of downstream activity received by this operator	<i>Not answered.</i>
Downstream OGRID that should have notified this operator	<i>Not answered.</i>
Date notified of downstream activity requiring this vent or flare	<i>Not answered.</i>
Time notified of downstream activity requiring this vent or flare	<i>Not answered.</i>

<b>Steps and Actions to Prevent Waste</b>	
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%.
Steps taken to limit the duration and magnitude of vent or flare	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**

<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

Action 247882

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**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.	8/3/2023