

Compositional Analysis Summary Report

from SCADA (Elynx) dated 4/21/2025

Component	Value	Units (%)
Nitrogen (N2)	0.601	
Carbon Dioxide (CO2)	0.1381	
Hydrogen Sulfide (H2S)	0	
Methane (C1)	73.8098	
Ethane (C2)	12.0671	
Propane (C3)	6.5455	
i-Butane (IC4)	1.0686	
n-Butane (NC4)	2.6253	
i-Pentane (IC5)	0.7301	
n-Pentane (NC5)	0.8805	
n-Hexane (NC6)	0.9204	
n-Heptane (NC7)	0.4602	
NC8	0.1534	
Total	100	%

While the site flare (and associated flare meter) was out of service, a waste stream (natural gas) was inadvertently directed to the flare stack and vented to atmosphere..

Process for Determining Venting Volumes		Response
1	Identified the isolation valve that allowed the waste stream to intermittently flow to the flare stack.	Zia Hills PLC, XV1010
2	Retrieved isolation valve open status data from SCADA ("e-Lynx") for the duration of the event.	Event Duration 3/31/2025 - 4/18/2025 (19 days)
3	Using the SCADA data, identified the cumulative number of minutes the valve was open.	19,842 minutes (13.79 days) over the 19 day event
4	Used flare meter spot flow rates for the period prior to the flare being out of service (3/2 - 3/16/2025) to determine a representative flow rate.	Representative average flow rate = 13.49 MSCFD
5	Calculated the vented volumes based on representative flow rates of the flare and the cumulative minutes that the isolation valve was open.	13.79 days x 13.49 MSCFD = 185.94 MSCF

Sante Fe Main Office
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General Information
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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 460137

DEFINITIONS

Operator: SCM Operations, LLC 5775 N Sam Houston Pkwy W Houston, TX 77086	OGRID: 330368
	Action Number: 460137
	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

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QUESTIONS

Prerequisites <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	[fAPP2123262420] Nailed It Gathering System

Determination of Reporting Requirements <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

Equipment Involved	
Primary Equipment Involved	Gas Compressor Station
Additional details for Equipment Involved. Please specify	Not answered.

Representative Compositional Analysis of Vented or Flared Natural Gas <i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	74
Nitrogen (N2) percentage, if greater than one percent	0
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 (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	04/17/2025
Time vent or flare was discovered or commenced	09:21 AM
Time vent or flare was terminated	12:59 PM
Cumulative hours during this event	331

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Human Error Gas Compressor Station Natural Gas Vented Released: 186 Mcf Recovered: 0 Mcf Lost: 186 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.	False
Please explain reason for why this event was beyond this operator's control	Not answered.
Steps taken to limit the duration and magnitude of vent or flare	Pressure set point on pressure-actuated valve adjusted to prevent waste stream from flowing to out of service flare.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Flare was returned to service.

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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 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
sworthen	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.	5/8/2025