



Certificate of Analysis

Number: 6030-24080778-001A

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. 07, 2024

Field:	PERMIAN_RESOURCES	Sampled By:	JE
Station Name:	Mesa Verde CTB Check (FMP)	Sample Of:	Gas Spot
Station Number:	15500C	Sample Date:	08/26/2024 13:00
Station Location:	OP-L2109-BT001	Sample Conditions:	88 psig, @ 100 °F Ambient: 94 °F
Sample Point:	Meter	Effective Date:	08/26/2024 13:00
Property ID:	FMP/LSE NMNM137096X	Flow Rate:	16345 MSCFD
Formation:	NEW_MEXICO	Method:	GPA-2261M
County:		Cylinder No:	1111-012788
Well Name:	CTB	Instrument:	70142339 (Inficon GC-MicroFusion)
Type of Sample:	Spot-Cylinder	Last Inst. Cal.:	08/26/2024 0:00 AM
Heat Trace Used:	N/A	Analyzed:	08/29/2024 11:13:00 by CDW
Sampling Method:	:Fill and Purge	Sampling Company:	:OXY

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	0.0000	0.0000	0.0000	
Nitrogen	1.5659	1.5454	1.8290	
Carbon Dioxide	3.1602	3.1189	5.7990	
Methane	73.5473	72.5866	49.1967	
Ethane	11.1262	10.9809	13.9497	2.933
Propane	5.8165	5.7405	10.6943	1.580
Iso-Butane	0.8750	0.8636	2.1206	0.282
n-Butane	2.2109	2.1820	5.3580	0.687
Iso-Pentane	0.5872	0.5795	1.7664	0.212
n-Pentane	0.6889	0.6799	2.0724	0.246
Hexanes	0.5852	0.5776	2.1029	0.237
Heptanes	0.7336	0.7240	3.0649	0.334
Octanes	0.4029	0.3976	1.9188	0.203
Nonanes Plus	0.0238	0.0235	0.1273	0.013
	101.3236	100.0000	100.0000	6.727

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	23.67	128.26
Compressibility Factor	0.9955	
Relative Density Real Gas	0.8206	4.4283

GPA 2172 Calculation:**Calculated Gross BTU per ft³ @ 14.65 psia & 60°F**

Real Gas Dry BTU	1317.2	6974.4
Water Sat. Gas Base BTU	1294.7	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1311.3	6943.2
Ideal, Gross HV - Wet	1288.3	6818.7

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.



UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility Id# fAPP2126659618

Operator: OXY USA, Inc.

Facility: Mesa Verde 18 CTB

Flare Date: 06/25/2025

Duration of Event: 2 Hours

MCF Flared: 275

Start Time: 12:40 AM

End Time: 02:40 AM

Cause: Emergency Flare > Third Party Downstream Activity > Enlink > Rico Station > Operational Issues > Fuel Skid Regulator Issues

Method of Flared Gas Measurement: Gas Flare Meter

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

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline compressor station operator, which impacted OXY's ability to send gas to them. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of OXY's custody transfer point and out of OXY's control to foresee, avoid or prevent from happening and did not stem from any of OXY's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. In this instance, a flaring event took place after a fuel skid regulator failed at a third-party downstream operator, resulting in an unexpected halt of sales gas flow intake by Enlink operations. The issue with the fuel skid regulator originated from Enlink, a third-party downstream offloading operator facing operational challenges at their Rico Station. Enlink's control center informed OXY gas control personnel; however, the timing of this notification was after flaring had already started, limiting OXY's ability to intervene and prevent flaring. OXY field and operations teams monitor the facility to identify any deviations from standard operational parameters. Despite this, Enlink did not provide advance notice to OXY personnel regarding the potential stoppage of sales gas flow intake due to their equipment issues at Rico Station. If prior notice had been provided, OXY field and operations personnel could have adjusted well operations to decrease gas sent to the facility and to sales, which may have reduced the likelihood of a flaring event occurring. While flaring is not OXY's preferred solution for managing surplus gas generated by third-party downstream operator challenges, it is employed as a critical safety measure. This process allows us to control facility overpressure, safely combust excess gas, and mitigate potential risks including equipment damage, leaks, or explosions, thereby ensuring the protection of our operations, equipment, and field personnel. OXY's operations and facility equipment were operating normally and at full capacity before the flaring event, which was attributed to operational issues at Enlink's Rico Station. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the greatest extent.

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

It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has 98% combustion efficiency to lessen emissions as much as possible. In this instance, a flaring event took place after a fuel skid regulator failed at a third-party downstream operator, resulting in an unexpected halt of sales gas flow intake by Enlink operations. The issue with the fuel skid regulator originated from Enlink, a third-party downstream offloading operator facing operational challenges at their Rico Station. Enlink's control center informed OXY gas control personnel; however, the timing of this notification was after flaring had already started, limiting OXY's

ability to intervene and prevent flaring. OXY field and operations teams monitor the facility to identify any deviations from standard operational parameters. Despite this, Enlink did not provide advance notice to OXY personnel regarding the potential stoppage of sales gas flow intake due to their equipment issues at Rico Station. If prior notice had been provided, OXY field and operations personnel could have adjusted well operations to decrease gas sent to the facility and to sales, which may have reduced the likelihood of a flaring event occurring. As soon as flaring was triggered, an OXY production tech, who was on-site, was able to make adjustments to gas storage wells and choke back several high GOR wells in the field to reduce injection and sales gas so that pressure would stay below the flare trigger setpoints of the facility to cease flaring. While flaring is not OXY's preferred solution for managing surplus gas generated by third-party downstream operator challenges, it is employed as a critical safety measure. This process allows us to control facility overpressure, safely combust excess gas, and mitigate potential risks including equipment damage, leaks, or explosions, thereby ensuring the protection of our operations, equipment, and field personnel. OXY's operations and facility equipment were operating normally and at full capacity before the flaring event, which was attributed to operational issues at Enlink's Rico Station. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the greatest extent.

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

OXY is not able to implement or take corrective actions to resolve the underlying cause or prevent future instances of third-party downstream operator's gas flow restriction, shut-in, or suspension within their offload sales gas pipeline, as these issues occur beyond OXY's custody transfer point and lie outside the company's control. Operational challenges at Enlink that affect its ability to manage gas flow volumes from OXY may consequently limit OXY's capacity to continue its sales gas transmission. In these instances, excess gas must be flared to ensure safety when sales gas line pressures reach hazardous levels, potentially impacting Oxy's operations, equipment, and field personnel. OXY is dedicated to minimizing emissions wherever feasible and strives to maintain effective communication with both downstream and midstream operators, when practical, to address such issues promptly and efficiently.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

DEFINITIONS

Action 483923

DEFINITIONS

Operator:	OGRID: 16696
OXY USA INC P.O. Box 4294 Houston, TX 772104294	Action Number: 483923
	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 483923

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 483923
	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	[FAPP2126659618] MESA VERDE 18 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	Emergency Flare > Third Party Downstream Activity > Enlink > Rico Station > Operational Issues > Fuel Skid Regulator Issues

Representative Compositional Analysis of Vented or Flared Natural Gas

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

Methane (CH4) percentage	73
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	3
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 483923

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 483923
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	06/25/2025
Time vent or flare was discovered or commenced	12:40 AM
Time vent or flare was terminated	02:40 AM
Cumulative hours during this event	2

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	Cause: Other Other (Specify) Natural Gas Flared Released: 275 Mcf Recovered: 0 Mcf Lost: 275 Mcf.
Other Released Details	<i>Not answered.</i>
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	Yes
Was notification of downstream activity received by this operator	No
Downstream OGRID that should have notified this operator	[320009] ENLINK MIDSTREAM OPERATING, LP
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>

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 interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline compressor station operator, which impacted OXY's ability to send gas to them. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of OXY's custody transfer point and out of OXY's control to foresee, avoid or prevent from happening and did not stem from any of OXY's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. In this instance, a flaring event took place after a fuel skid regulator failed at a third-party downstream operator, resulting in an unexpected halt of sales gas flow intake by Enlink operations. The issue with the fuel skid regulator originated from Enlink, a third-party downstream offloading operator facing operational challenges at their Rico Station. Enlink's control center informed OXY gas control personnel; however, the timing of this notification was after flaring had already started, limiting OXY's ability to intervene and prevent flaring. OXY field and operations teams monitor the facility to identify any deviations from standard operational parameters. Despite this, Enlink did not provide advance notice to OXY personnel regarding the potential stoppage of sales gas flow intake due to their equipment issues at Rico Station. If prior notice had been provided, OXY field and operations personnel could have adjusted well operations to decrease gas sent to the facility and to sales, which may have reduced the likelihood of a flaring event occurring. While flaring is not OXY's preferred solution for managing surplus gas generated by third-party downstream operator challenges, it is

	employed as a critical safety measure.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has 98% combustion efficiency to lessen emissions as much as possible. In this instance, a flaring event took place after a fuel skid regulator failed at a third-party downstream operator, resulting in an unexpected halt of sales gas flow intake by Enlink operations. The issue with the fuel skid regulator originated from Enlink, a third-party downstream offloading operator facing operational challenges at their Rico Station. Enlink's control center informed OXY gas control personnel; however, the timing of this notification was after flaring had already started, limiting OXY's ability to intervene and prevent flaring. OXY field and operations teams monitor the facility to identify any deviations from standard operational parameters. Despite this, Enlink did not provide advance notice to OXY personnel regarding the potential stoppage of sales gas flow intake due to their equipment issues at Rico Station. If prior notice had been provided, OXY field and operations personnel could have adjusted well operations to decrease gas sent to the facility and to sales, which may have reduced the likelihood of a flaring event occurring. As soon as flaring was triggered, an OXY production tech, who was on-site, was able to make adjustments to gas storage wells and choke back several high GOR wells in the field to reduce injection and sales gas so that pressure would stay below the flare trigger setpoints of the facility to cease flaring. While flaring is not OXY's preferred solution for managing surplus gas generated by third-party downstream operator challenges, it is employed as a critical safety measure.
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ACKNOWLEDGMENTS

Action 483923

ACKNOWLEDGMENTS

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	Action Number: 483923
	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

Action 483923

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 483923
	Action Type: [C-129] Venting and/or Flaring (C-129)

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.	7/10/2025