Certificate of Analysis

Number: 6030-25010237-001A

Artesia Laboratory
200 E Main St.
Artesia, NM 88210
Phone 575-746-3481

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

Field:	PERMIAN_RESOURCES	Report Date:	01/19/2025
Station Name:	Sand Dunes CTB Check	Sampled By:	CG
Station Number:	17000C	Sample Of:	Gas
Station Location:	OP-L0901-BT002	Sample Type:	Spot
Sample Point:	Meter	Sample Conditions:	125 psig, @ 62 °F Ambient: 43 °F
Property ID:	FMP/LSE NM40659	Sample Date:	01/13/2025 01:45
Formation:	NEW_MEXICO	Received Date:	01/14/2025
County:		Login Date:	01/14/2025
Well Name:	CTB	Effective Date:	01/01/2025
Type of Sample: :	Spot-Cylinder	Flow Rate:	34819 MSCFD
Sampling Company: :	SPL - OXY	Sampling Method:	Purge/Fill Vacuum
Heat Trace Used:	N/A	Heating Method:	
Last Inst. Cal.:	01/13/2025 08:04:58	Method:	GPA-2261M
Analyzed:	01/15/2025 11:37:09 by CDW	Cylinder No:	9999-005126
		Instrument:	70142339 (Inficon GC-MicroFusion)

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.0000	0.0000	0.0000		GPM TOTAL C2+	6.669
Nitrogen	1.2226	1.2114	1.5246		GPM TOTAL C3+	3.389
Methane	75.4281	74.7368	53.8641		GPM TOTAL iC5+	0.655
Carbon Dioxide	0.6516	0.6456	1.2764			
Ethane	12.3989	12.2852	16.5957	3.280		
Propane	6.3610	6.3027	12.4858	1.733		
Iso-butane	0.9604	0.9516	2.4848	0.311		
n-Butane	2.2123	2.1920	5.7237	0.690		
Iso-pentane	0.5013	0.4967	1.6100	0.181		
n-Pentane	0.5305	0.5256	1.7036	0.190		
Hexanes Plus	0.6584	0.6524	2.7313	0.284		
	100.9251	100.0000	100.0000	6.669		

Calculated Physical Properties	**Total**	**C6+**
Relative Density Real Gas	0.7714	3.2176
Calculated Molecular Weight	22.26	93.19
Compressibility Factor	0.9960	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1309	5113
Water Sat. Gas Base BTU	1287	5024
Ideal, Gross HV - Dry at 14.65 psia	1303.6	5113.2
Ideal, Gross HV - Wet	1280.8	5023.7
Net BTU Dry Gas - real gas	1189	
Net BTU Wet Gas - real gas	1169	

Comments: H2S Field Content: 0 %

Mostafa Ahmadi

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility Id# fAPP2127048458
Operator: OXY USA, Inc.
Facility: Sand Dunes South Corridor CTB
Vent Date: 07/05/2025
Duration of Event: 24 Hours
MCF Vented: 94
Start Time: 12:00 AM
End Time: 11:59 PM
Cause: Equipment Malfunction > VCU > Flash Process Fire
Method of Vented Gas Measurement: Allocated Calculation

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

This 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying sudden and unexpected malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible by working safely and diligently.

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

While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.

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

Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of VCU malfunctions as notwithstanding VCU engine design and operation, VCU's are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause malfunctions to occur. Oxy continually strives to maintain and operate all its 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.

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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 486852
	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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 486852
	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	**[fAPP2127048458] Sand Dunes South Corridor CTB**

Determination of Reporting Requirements	
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional 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	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 withing 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	Equipment Malfunction > VCU > Flash Process Fire

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	75
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (C02) percentage, if greater than one percent	1
Oxygen (02) 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 Sufide (H2S) PPM quality requirement	*Not answered.*
Carbon Dioxide (C02) percentage quality requirement	*Not answered.*
Oxygen (02) percentage quality requirement	*Not answered.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 486852
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	07/05/2025
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	Cause: Other | Other (Specify) | Natural Gas Vented | Released: 94 Mcf | Recovered: 0 Mcf | Lost: 94 Mcf.
Natural Gas Flared (Mcf) Details	*Not answered.*
Other Released Details	*Not answered.*
Additional details for Measured or Estimated Volume(s). Please specify	Allocated Vent Calculation
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	This 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this situation, venting occurred due to a brief flash process fire in VCU unit #1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying sudden and unexpected malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible by working safely and diligently.
	While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. In this situation, venting occurred due to a brief flash process fire in VCU unit

Steps taken to limit the duration and magnitude of vent or flare	#1 on July 4, 2025. During scheduled preventative maintenance, fluids were cleared from the suction piping, and applicable pressure was observed at the tank pit. The suction valve was fully opened, allowing fluid behind the valve to migrate to the burner pilot, which resulted in a flash process fire. The fire was extinguished when the inlet was closed. Following the incident, the VCU remained offline due to burnt wires and pending repairs. With VCU unit #1 shut down, pressure increased in the water tanks, leading to venting through the Enardo hatches. While venting is not OXY's primary approach for addressing or rectifying malfunctions, it was essential to maintain operational and equipment safety until the issue could be resolved expeditiously. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of VCU malfunctions as notwithstanding VCU engine design and operation, VCU's are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause malfunctions to occur. Oxy continually strives to maintain and operate all its 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.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 486852
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	I acknowledge that I am authorized to submit a *Venting and/or Flaring* (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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 486852
	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.	7/20/2025