



## 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  
Station Name: Mesa Verde CTB Check (FMP)  
Station Number: 15500C  
Station Location: OP-L2109-BT001  
Sample Point: Meter  
Property ID: FMP/LSE NMNM137096X  
Formation: NEW\_MEXICO  
County:  
Well Name: CTB  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge

Sampled By: JE  
Sample Of: Gas Spot  
Sample Date: 08/26/2024 13:00  
Sample Conditions: 88 psig, @ 100 °F Ambient: 94 °F  
Effective Date: 08/26/2024 13:00  
Flow Rate: 16345 MSCFD  
Method: GPA-2261M  
Cylinder No: 1111-012788  
Instrument: 70142339 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 08/26/2024 0:00 AM  
Analyzed: 08/29/2024 11:13:00 by CDW  
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 ft<sup>3</sup> @ 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

*Mostaq Ahmmed*

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**Facility:** Mesa Verde 18 CTB**Duration of Event:** 3 Hours 44 Minutes**Start Time:** 08:15 PM**Cause:** Emergency Flare > Third Party Downstream Activity > Enlink > ESD Valve Closed**Method of Flared Gas Measurement:** Gas Flare Meter**Operator:** OXY USA, Inc.**Flare Date:** 12/30/2025**MCF Flared:** 404**End Time:** 11:59 PM**1. Reason why this event was beyond Operator's control:**

This emissions event was caused by the sudden, unavoidable breakdown of equipment or process that was beyond OXY'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. This unexpected equipment or process failure was caused by a third-party operator, downstream of OXY's custody transfer point, and was beyond OXY's ability to predict, prevent, or control. This emissions event issue did not arise from any upstream activity at OXY's facility that could have been anticipated or avoided, nor could it have been prevented through proper design, operation, or routine maintenance. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly closed and reopened throughout the night without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve. Although Enlink's field technician did arrive, there was a delay in response time, resulting in intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. 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. OXY internal procedures mandate that production technicians promptly assess and respond to unexpected flaring events and ensure the underlying cause is identified. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly closed and reopened throughout the night without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve. Although Enlink's field technician visited several times to reopen the ESD valve, delayed Enlink response time led to prolonged intermittent flaring. Throughout this time, OXY field staff began activating storage wells and shut down high GOR wells when needed to reduce sale line pressure below the flare's activation threshold, thereby ending every occurrence of intermittent flaring. Although flaring is not OXY's preferred method for handling excess gas, it is

necessary to ensure the safety of our operations, equipment, and field personnel. 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 unable to initiate or implement corrective actions to prevent or eliminate the causes and potential recurrence of equipment failures or operational issues that are solely attributable to Enlink, a third-party downstream operator. Such equipment breakdowns or process issues occur beyond OXY's custody transfer point and fall outside OXY's scope of control, making them impossible for OXY to anticipate, prevent, or avoid. OXY is dedicated to effectively managing and reducing emissions to the greatest extent possible. The only action that OXY can take in these circumstances is to maintain ongoing communication with Enlink gas control room personnel to ensure coordinated and efficient responses to resolve issues in a timely manner. 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  
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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 543285

**DEFINITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 543285
	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 543285

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 543285
	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	[fAPP2126659618] MESA VERDE 18 CTB

<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	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.
<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 <b>at least 50 MCF</b> of natural gas vented and/or flared during this event	Yes
Did this vent or flare result in the release of <b>ANY</b> 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	Emergency Flare > Third Party Downstream Activity > Enlink > ESD Valve Closed

<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	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
<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, Page 2

Action 543285

**QUESTIONS (continued)**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 543285
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/30/2025
Time vent or flare was discovered or commenced	08:15 PM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	4

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 404 Mcf   Recovered: 0 Mcf   Lost: 404 Mcf.
Other Released Details	Not answered.
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	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	<p>This emissions event was caused by the sudden, unavoidable breakdown of equipment or process that was beyond OXY'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. This unexpected equipment or process failure was caused by a third-party operator, downstream of OXY's custody transfer point, and was beyond OXY's ability to predict, prevent, or control. This emissions event issue did not arise from any upstream activity at OXY's facility that could have been anticipated or avoided, nor could it have been prevented through proper design, operation, or routine maintenance. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly closed and reopened throughout the night without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve. Although Enlink's field technician did arrive, there was a delay in response time, resulting in intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. The occurrence of this event was beyond OXY's</p>

	control. OXY took all possible measures to manage and reduce emissions to the greatest extent.
Steps taken to limit the duration and magnitude of vent or flare	<p>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. OXY internal procedures mandate that production technicians promptly assess and respond to unexpected flaring events and ensure the underlying cause is identified. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly closed and reopened throughout the night without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve. Although Enlink's field technician visited several times to reopen the ESD valve, delayed Enlink response time led to prolonged intermittent flaring. Throughout this time, OXY field staff began activating storage wells and shut down high GOR wells when needed to reduce sale line pressure below the flare's activation threshold, thereby ending every occurrence of intermittent flaring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the greatest extent.</p>
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	<p>OXY is unable to initiate or implement corrective actions to prevent or eliminate the causes and potential recurrence of equipment failures or operational issues that are solely attributable to Enlink, a third-party downstream operator. Such equipment breakdowns or process issues occur beyond OXY's custody transfer point and fall outside OXY's scope of control, making them impossible for OXY to anticipate, prevent, or avoid. OXY is dedicated to effectively managing and reducing emissions to the greatest extent possible. The only action that OXY can take in these circumstances is to maintain ongoing communication with Enlink gas control room personnel to ensure coordinated and efficient responses to resolve issues in a timely manner. 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.</p>

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ACKNOWLEDGMENTS

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	Action Number: 543285
	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 <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

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	Action Number: 543285
	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.	1/14/2026