

**VCU FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility Id#** fAPP2126659618**Facility:** Mesa Verde 18 CTB**Duration of Event:** >8 hours/day**Start Time:** 12:00 AM**Cause:** Routine combustion of storage tank vapors using an enclosed combustion device (VCU)**Method of Flared Gas Measurement:** SE_MV VCU F6002 tracking combusted gas**Operator:** OXY USA, Inc.**Flare Date:** 08/13/2026**MCF Flared:** 143**End Time:** 11:59 PM**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:

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

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Certificate of Analysis

Number: 6030-25091451-001A

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:	09/29/2025
Station Name:	MESA VERDE CTB CHECK (FMP) -- Meter	Sampled By:	JE
Station Number:	15500C	Sample Of:	Gas
Station Location:	OP-L2109-BT001	Sample Type:	Spot
Sample Point:	Meter	Sample Conditions:	103 psig, @ 76 °F Ambient: 82 °F
Property ID:	FMP/LSE NMNM137096X	Sample Date:	09/23/2025 09:00
Formation:	NEW_MEXICO	Received Date:	09/24/2025
County:		Login Date:	09/24/2025
Well Name:	CTB	Effective Date:	09/01/2025
Type of Sample :	Spot-Cylinder	Flow Rate:	28980 MSCFD
Sampling Company:	SPL - OXY	Sampling Method:	Purge/Fill
Instrument:	70142339 (Inficon GC-MicroFusion)	Heating Method:	Yes
Last Inst. Cal.:	09/22/2025 0:00 AM	Method:	GPA 2286
Analyzed:	09/26/2025 08:47:06 by CDW	Cylinder No:	9999-005115

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	0.0000	0.0000	0.0000		GPM TOTAL C2+
Nitrogen	1.4326	1.4228	1.8095		5.788
Carbon Dioxide	2.4798	2.4629	4.9208		
Methane	76.3993	75.8775	55.2620		
Ethane	10.9653	10.8904	14.8664	2.907	
Propane	5.2175	5.1819	10.3735	1.425	
Iso-Butane	0.7629	0.7577	1.9993	0.247	
n-Butane	1.8099	1.7975	4.7430	0.566	
Iso-Pentane	0.4434	0.4404	1.4425	0.161	
n-Pentane	0.4977	0.4943	1.6191	0.179	
Hexanes	0.3081	0.3060	1.1971	0.126	
Heptanes	0.2486	0.2469	1.1232	0.114	
Octanes	0.1028	0.1021	0.5295	0.052	
Nonanes Plus	0.0197	0.0196	0.1141	0.011	
	100.6876	100.0000	100.0000	5.788	

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.03	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7631	4.4283
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1246.9	6974.4
Water Sat. Gas Base BTU	1225.6	6852.4
Ideal, Gross HV - Dry	1242.2	6948.0
Ideal, Gross HV - Wet	1220.4	6823.6

Comments: H2S Field Content: 0 %

Mostafa Ahmmed

Petroleum Chemist

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.

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 622965

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 622965
	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 622965

QUESTIONS

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	Action Number: 622965
	Action Type: [C-129] Venting and/or Flaring (C-129)

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	[fAPP2126659618] MESA VERDE 18 CTB

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	Other (Specify)
Additional details for Equipment Involved. Please specify	Routine combustion of storage tank vapors using an enclosed combustion device (VCU)

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	76
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	2
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

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QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	08/13/2026
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	Not answered.
Natural Gas Flared (Mcf) Details	Cause: Normal Operations Other (Specify) Natural Gas Flared Released: 143 Mcf Recovered: 0 Mcf Lost: 143 Mcf.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	SE_MV VCU F6002 tracking combusted gas
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	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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	Action Number: 622965
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☒	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.
☒	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

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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.	9/9/2026