



Certificate of Analysis

Number: 6030-26072334-001A-Rev1

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:	07/20/2026
Station Name:	SAND DUNES CTB PRODUCTION 2 (FMP) --	Sampled By:	JE
Station Number:	17012P	Sample Of:	Gas
Station Location:	OP-L0901-BT002	Sample Type:	Spot
Sample Point:	Meter	Sample Conditions:	92 psig, @ 94 °F Ambient: 90 °F
Property ID:	FMP/LSE NM40659	Sample Date:	07/13/2026 13:00
Formation:	NEW_MEXICO	Received Date:	07/14/2026
County:		Login Date:	07/14/2026
Well Name:	CTB	Effective Date:	07/01/2026
Type of Sample :	Spot-Cylinder	Flow Rate:	47740 MSCFD
Sampling Company:	SPL - OXY	Sampling Method:	Purge/Fill
Instrument:	70142339 (Inficon GC-MicroFusion)	Heating Method:	Yes
Last Inst. Cal.:	07/13/2026 0:00 AM	PO/Ref. No:	4503308150
Analyzed:	07/16/2026 14:55:53 by CDW	Method:	GPA 2286
		Cylinder No:	9999-005160

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	1.5799	1.5788	1.9869		6.412
Carbon Dioxide	1.2756	1.2747	2.5202		
Methane	74.7641	74.7109	53.8442		
Ethane	11.9857	11.9772	16.1791	3.198	
Propane	6.0541	6.0498	11.9844	1.664	
Iso-Butane	0.7897	0.7891	2.0604	0.258	
n-Butane	1.8790	1.8777	4.9029	0.591	
Iso-Pentane	0.4540	0.4537	1.4705	0.166	
n-Pentane	0.4954	0.4950	1.6044	0.179	
Hexanes	0.3538	0.3535	1.3685	0.145	
Heptanes	0.2952	0.2950	1.3279	0.136	
Octanes	0.1311	0.1310	0.6722	0.067	
Nonanes Plus	0.0136	0.0136	0.0784	0.008	
	100.0712	100.0000	100.0000	6.412	

Revised Report: This report replaces the initial report for the following reasons: N/A



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		Cylinder No:	9999-005160

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.26	128.26
Compressibility Factor	0.9960	
Relative Density Real Gas	0.7713	4.4283
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1286.9	6974.4
Water Sat. Gas Base BTU	1264.9	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1281.8	6946.8
Ideal, Gross HV - Wet	1259.4	6822.3

Comments: Calculations completed utilizing GPA-2145 at a temperature base of 60°F
H2S Field Content: 0 %

Revised Report: This report replaces the initial report for the following reasons: N/A

Mostaq Ahammad

Mostaq Ahammad, 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.

**UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility Id#** fAPP2127048458**Facility:** Sand Dunes South Corridor CTB**Duration of Event:** 24 Hours**Start Time:** 12:00 AM**Cause:** Equipment Malfunction > PIT Malfunction > VRT > Tanks**Method of Vented Gas Measurement:** Allocated Vent Calculation**Operator:** OXY USA, Inc.**Vent Date:** 08/31/2026**MCF Vented:** 88**End Time:** 11:59 PM**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 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 preventative maintenance practices. OXY maintains sound facility operating practices and an ongoing preventative maintenance program for facility equipment. In this case, venting resulted from a PIT (Pressure Indicating Transmitter) malfunction, which was supposed to monitor and measure VRT level to avoid oil overflows. The malfunction allowed oil in the VRT to overflow into the tanks, increasing flash gas volumes beyond the capacity of the facility's VRUs and combustors. This caused the tanks to overpressure and vent.

The venting malfunction was identified during an internal flyover. Although the exact start time is uncertain, Operations and other team members began an extensive review to determine how long the malfunction may have continued. Based on best engineering and operational estimates, the team determined that the venting malfunction may have begun on August 13th, 2026. OXY believes the malfunction resulted from a sudden and unavoidable automated equipment failure beyond its reasonable control. Although this type of equipment failure is infrequent, OXY's Operations group promptly initiated a root cause analysis to determine why the PIT malfunctioned and how similar events can be prevented in the future. Once OXY established an objectively reasonable basis for estimating the total and daily volume of potentially vented gas, it began submitting the required NMOCD compliance reports.

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

OXY's established policy is to route stranded gas to a flare, rather than vent, during unforeseen and unavoidable emergencies or malfunctions that are outside OXY's ability to foresee, prevent, or avoid. This practice is implemented to minimize emissions to the maximum extent practicable and to limit the duration and magnitude of any unexpected emissions release event. In this case, venting resulted from a PIT (Pressure Indicating Transmitter) malfunction, which was supposed to monitor and measure VRT level to avoid oil overflows. The malfunction allowed oil in the VRT to overflow into the tanks, increasing flash gas volumes beyond the capacity of the facility's VRUs and combustors. This caused the tanks to overpressure and vent. Based on best engineering and operational estimates, the team determined that the venting malfunction may have begun on August 13th, 2026. OXY believes the malfunction resulted from a sudden and unavoidable automated equipment failure beyond its reasonable control. Although this type of equipment failure is infrequent, OXY's Operations group promptly initiated a root cause analysis to determine why the PIT malfunctioned and how similar events can be prevented in the future. Based on best engineering and operational estimates, the team determined that the venting malfunction may have begun on August 13th, 2026. OXY believes the malfunction resulted from a sudden and unavoidable automated equipment failure beyond its reasonable control. Although this type of equipment failure is infrequent, OXY's Operations group promptly initiated a root cause analysis to determine why the PIT malfunctioned and how similar events can be prevented in the future.

After the venting malfunction was identified during September 3, 2026, internal flyover data review, Operations promptly dispatched a production technician and an automation team member to investigate the cause and determine the appropriate repair. After confirming that the PIT malfunction caused the tanks to overpressure and vent, the technician and automation team members worked diligently to minimize the emissions event to the greatest extent practicable.

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

OXY is committed to minimizing emissions to the greatest extent practicable and believes this venting event, identified during an internal flyover, resulted from a sudden and unavoidable equipment failure beyond OXY's reasonable control. Although this type of equipment failure is infrequent, OXY has initiated a root cause analysis to determine how the malfunction occurred and identify measures to prevent similar venting malfunctions in the future.

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 624939

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 624939
	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 624939

QUESTIONS

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	Action Number: 624939
	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	[fAPP2127048458] Sand Dunes South Corridor 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	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.
<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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

Equipment Involved	
Primary Equipment Involved	Pit (Specify)
Additional details for Equipment Involved. Please specify	Equipment Malfunction > PIT Malfunction > VRT > Tanks

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	75
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	1
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 624939

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 624939
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	08/31/2026
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: Equipment Failure Other (Specify) Natural Gas Flared Released: 88 Mcf Recovered: 0 Mcf Lost: 88 Mcf.
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 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 preventative maintenance practices.
Steps taken to limit the duration and magnitude of vent or flare	OXY's established policy is to route stranded gas to a flare, rather than vent, during unforeseen and unavoidable emergencies or malfunctions that are outside OXY's ability to foresee, prevent, or avoid. This practice is implemented to minimize emissions to the maximum extent practicable and to limit the duration and magnitude of any unexpected emissions release event.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	OXY is committed to minimizing emissions to the greatest extent practicable and believes this venting event, identified during an internal flyover, resulted from a sudden and unavoidable equipment failure beyond OXY's reasonable control.

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ACKNOWLEDGMENTS

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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

Action 624939

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	Action Number: 624939
	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.	9/15/2026