

**EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** South Hobbs Plant**Start Date:** 07/27/2021 @ 09:20 AM**End Date:** 07/27/2021 @ 09:26 AM**Cause:** THE SOUTH HOBBS FLARED DUE TO SHUTTING DOWN "A" TRAIN TO REPLACE BAD VALVES ON THE COMPRESSOR.**Duration of event:** 0:06 hours**Method of Flared Gas Measurement:** Flare Meter

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure flame is lit and meeting opacity requirements.

This event was a sudden and unforeseeable compressor malfunction of "A" Train due to faulty and broken valves on the compressor unit and needed to be replaced. Oxy operators were alerted to a malfunction of the compressor unit an alarm started going off indicating an increasing pressure rising and a malfunction of the unit. Archrock arrived at the facility and began to immediately inspect the unit and reading the alarm pressures. Archrock mechanic determined that the compressor unit would need to be shut down so that he could perform a thorough inspection of the unit to determine exact cause involving the malfunction alarms. OXY operators assisted with shutting down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. After thoroughly inspecting the compressor unit, Archrock mechanic determined the cause of the malfunction was due to faulty and broken valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. Archrock compressor mechanic replaced the faulty and broken valves and inspected the compressor unit thoroughly for any other possible reasons the compressor unit might be getting high interstage pressure. After inspecting and troubleshooting the compressor unit, the compressor mechanic brought the unit back to normal working service. OXY personnel were in place and available at the facility location when compressor unit was returned to working service.

Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause

compressor unit malfunctions to occur without warning or advance notice. OXY made every effort to control and minimize emissions as much as possible during this event.

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure flame is lit and meeting opacity requirements.

In this case, the steps taken to limit duration and magnitude of flaring was for Oxy operators to respond to the compression equipment malfunction alarms by quickly contacting Archrock to immediately send out a compressor mechanic, as the compressor unit was being shut down and a malfunction alarm had occurred. An Archrock mechanic quickly arrived at the facility and began to immediately inspect the unit and reading the alarm pressures. Archrock mechanic determined that the compressor unit would be shut down so that he could perform a thorough inspection of the unit to determine exact cause involving the pressure alarms. OXY operators assisted with shutting down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. In addition to shutting down "A" Train, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. After thoroughly inspecting the malfunctioning compressor unit, Archrock mechanic determined the cause of the malfunction was due to faulty and broken valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. Archrock mechanic replaced the faulty and broken valves on the throw and inspected the compressor unit thoroughly for any other possible reasons the compressor unit might be getting high interstage pressure. After inspecting and troubleshooting the compressor unit, the compressor mechanic brought the unit back to normal working service.

Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. OXY made every effort to control and minimize emissions as much as possible during this event.

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements.

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. "A" Train was working as designed and operated normally prior to shutting it down due to a malfunction of the compressor unit. Oxy has a strong and positive compression equipment preventative maintenance program in place. This flaring event was completely out of OXY's control to prevent from happening as it was determined the malfunction occurred due to faulty and broken valves. Valves can become faulty and broken suddenly and without warning, regardless of good preventative maintenance practices and programs. OXY made every effort to control and minimize emissions as much as possible during this event. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

**District I**

1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**

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**District III**

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**District IV**

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

QUESTIONS

Action 40100

**QUESTIONS**

Operator: OCCIDENTAL PERMIAN LTD P.O. Box 4294 Houston, TX 772104294	OGRID: 157984
	Action Number: 40100
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS****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 or is this venting or flaring caused by an emergency or malfunction	Yes
Did or will this venting or flaring last eight hours or more cumulatively within any 24-hour period from a single event	No
Is this considered a submission for a notification of a major venting or flaring	Yes, minor venting or flaring of natural gas.
The operator shall file a form C-141 instead of a form C-129 for a release that includes liquid during venting or flaring that is or may be a major or minor release under 19.13.29.7 NMAC	
Was there or will there be at least 50 MCF of natural gas vented or flared during this event	Yes
Did this venting or flaring 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

**Unregistered Facility Site**

Please provide the facility details, if the venting or flaring occurred or is occurring at a facility that does not have an Facility ID (##) yet.

Facility or Site Name	Not answered.
Facility Type	Not answered.

**Equipment Involved**

Primary Equipment Involved	Not answered.
Additional details for Equipment Involved. Please specify	Not answered.

**Representative Compositional Analysis of Vented or Flared Natural Gas**

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

Methane (CH4) percentage	4
Nitrogen (N2) percentage, if greater than one percent	0
Hydrogen Sulfide (H2S) PPM, rounded up	6,260
Carbon Dioxide (CO2) percentage, if greater than one percent	0
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.

**Date(s) and Time(s)**

Date venting or flaring was discovered or commenced	07/27/2021
Time venting or flaring was discovered or commenced	09:20 AM
Is the venting or flaring event complete	Yes
Date venting or flaring was terminated	07/27/2021
Time venting or flaring was terminated	09:26 AM
Total duration of venting or flaring in hours, if venting or flaring has terminated	0
Longest duration of cumulative hours within any 24-hour period during this event	0

**Measured or Estimated Volume of Vented or Flared Natural Gas**

Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Repair and Maintenance   Valve   Natural Gas Flared   Spilled: 80 Mcf   Recovered: 0 Mcf   Lost: 80 Mcf
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
Is this a gas only submission (i.e. only Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.

**Venting or Flaring Resulting from Downstream Activity**

Was or is this venting or flaring a result of downstream activity	Not answered.
Date notified of downstream activity requiring this venting or flaring	Not answered.
Time notified of downstream activity requiring this venting or flaring	Not answered.

**Steps and Actions to Prevent Waste**

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For this event, the operator could not have reasonably anticipated the current event and it was beyond the operator's control.	True
Please explain reason for why this event was beyond your operator's control	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements.
Steps taken to limit the duration and magnitude of venting or flaring	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements.
Corrective actions taken to eliminate the cause and reoccurrence of venting or flaring	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure the flame is lit and meeting opacity requirements.

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CONDITIONS  
  
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	Action Number: 40100
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
system	If the information provided in this report requires an amendment, submit a [C-129] Request to Amend Venting and/or Flaring Incident, utilizing your incident number from this event.	8/5/2021