



## Certificate of Analysis

Number: 6030-21060266-003A

Artesia Laboratory

200 E Main St.  
Artesia, NM 88210  
Phone 575-746-3481Chandler Montgomery  
Occidental Petroleum  
1502 W Commerce Dr.  
Carlsbad, NM 88220

June 28, 2021

Field:	Sand Dunes	Sampled By:	Javier Lazo
Station Name:	Sand Dunes CTB Train 3 Production	Sample Of:	Gas Spot
Station Number:	17009P	Sample Date:	06/24/2021 12:27
Station Location:	CTB	Sample Conditions:	90 psia, @ 105 °F Ambient: 100 °F
Sample Point:	Meter	Effective Date:	06/24/2021 12:27
Formation:	Monthly	Method:	GPA-2261M
County:	Eddy	Cylinder No:	1111-002295
Type of Sample:	Spot-Cylinder	Instrument:	70104124 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	05/18/2021 0:00 AM
Sampling Method:	Fill and Purge	Analyzed:	06/25/2021 13:45:45 by KNF
Sampling Company:	SPL		

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	1.770	1.78383	2.131	
Carbon Dioxide	1.321	1.33170	2.500	
Methane	72.953	73.52731	50.313	
Ethane	11.168	11.25608	14.436	3.007
Propane	6.184	6.23236	11.722	1.715
Iso-Butane	0.769	0.77545	1.922	0.253
n-Butane	1.954	1.96948	4.882	0.620
Iso-Pentane	0.551	0.55564	1.710	0.203
n-Pentane	0.641	0.64574	1.987	0.234
Hexanes	0.546	0.55030	2.023	0.226
Heptanes	0.675	0.68001	2.906	0.313
Octanes	0.527	0.53084	2.586	0.272
Nonanes Plus	0.160	0.16126	0.882	0.091
	99.219	100.0000	100.000	6.934

<b>Calculated Physical Properties</b>	<b>Total</b>	<b>C9+</b>
Calculated Molecular Weight	23.45	128.26
Compressibility Factor	0.9955	
Relative Density Real Gas	0.8129	4.4283

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1346.1	6974.4
Water Sat. Gas Base BTU	1323.2	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1340.1	6974.4
Ideal, Gross HV - Wet	1316.6	6852.4

**Comments:** H<sub>2</sub>S Field Content 0 ppm  
Mcf/day 3116

Data reviewed by: Eric Ramirez, Analyst

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:** Sand Dunes South Corridor CTB**Date:** 09/08/2021**Duration of event:** 57 minutes**MCF Flared:** 137**Start Time:** 08:15 AM**End Time:** 09:12 AM**Cause:** Downstream Activity Issue > Enterprise Emergency Shutdown**Method of Flared Gas Measurement:** Gas Flare Meter**Well API Associated with Facility:** 30-015-44526 Nimitz MDP1 12 Federal Com #001H

**Comments:** This upset event was not caused by any wells associated with the facility. The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline.

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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 interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility 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 gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible.

In this case, the unexpected shutdown of third-party pipeline operator, Enterprise's Sand Dunes mid-stream facility, caused by an emergency shut down due to detection of gas venting from a water hauler truck at their facility, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline and causing an immediate spike in high line pressure in their pipeline, which triggered a flaring event at Oxy's upstream facility. Until Enterprise 's downstream facility was able to handle the volume of gas sent to them, the spike in line pressure forced Oxy's upstream facility to route all its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their gas system pipeline.

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

It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, in order to minimize emissions as much as possible. In this case, the unexpected shutdown of third-party pipeline operator, Enterprise's Sand Dunes mid-stream facility, caused by an emergency shut down due to detection of gas venting from a water hauler truck at their facility, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline and causing an immediate spike in high line pressure in their pipeline, which triggered a flaring event at Oxy's upstream facility. Until Enterprise 's downstream facility was able to take the volume of gas sent to them, the spike in line pressure

prompted Oxy's upstream facility to route all its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline.

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

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The limited reactive actions that Oxy can do in this circumstance is to shut in multiple high GOR wells to minimize gas throughput at the Sand Dunes South Corridor CTB in order to match and reduce flaring volumes during this third-party pipeline operator outage.

**District I**1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720**District II**811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720**District III**1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170**District IV**1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 50936

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 50936
	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	[30-015-44526] NIMITZ MDP1 12 FEDERAL COM #001H
Incident Facility	Not answered.

**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 and/or flaring caused by an emergency or malfunction	Yes
Did or will this venting and/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 venting and/or flaring 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 or will there be at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this venting and/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
Was the venting and/or flaring 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	Emergency Flare > Downstream Activity Issue > Enterprise Emergency Shutdown

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

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

Methane (CH4) percentage	74
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
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 and/or flaring was discovered or commenced	09/08/2021
Time venting and/or flaring was discovered or commenced	08:15 AM
Time venting and/or flaring was terminated	09:12 AM
Cumulative hours during this event	1

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

Natural Gas Vented (Mcf) Details	Not answered.
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Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 137 Mcf   Recovered: 0 Mcf   Lost: 137 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 or is this venting and/or flaring a result of downstream activity	Yes
Was notification of downstream activity received by you or your operator	No
Downstream OGRID that should have notified you or your operator	[713731] Enterprise Crude Pipeline LLC
Date notified of downstream activity requiring this venting and/or flaring	Not answered.
Time notified of downstream activity requiring this venting and/or flaring	Not answered.

Steps and Actions to Prevent Waste	
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	See Justification Form > The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility 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 gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible.
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, in order to minimize emissions as much as possible. In this case, the unexpected shutdown of third-party pipeline operator, Enterprise's Sand Dunes mid-stream facility, caused by an emergency shut down due to detection of gas venting from a water hauler truck at their facility, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline and causing an immediate spike in high line pressure in their pipeline, which triggered a flaring event at Oxy's upstream facility. Until Enterprise 's downstream facility was able to take the volume of gas sent to them, the spike in line pressure prompted Oxy's upstream facility to route all its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The limited reactive actions that Oxy can do in this circumstance is to shut in multiple high GOR wells to minimize gas throughput at the Sand Dunes South Corridor CTB in order to match and reduce flaring volumes during this third-party pipeline operator outage.

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CONDITIONS

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	Action Number: 50936
	Action Type: [C-129] Venting and/or Flaring (C-129)

**CONDITIONS**

Created By	Condition	Condition Date
marialuna	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.	9/21/2021