



## Certificate of Analysis

Number: 6030-21120131-003A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

Chandler Montgomery  
Occidental Petroleum  
1502 W Commerce Dr.  
Carlsbad, NM 88220

Dec. 15, 2021

Field: Mills Ranch  
Station Name: Red Tank 27-28 CTB Test 2  
Station Number: 16207T  
Station Location: CTB  
Sample Point: Meter  
Formation: Monthly  
County: Lea, NM  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge  
Sampling Company: : SPL

Sampled By: Javier Lazo  
Sample Of: Gas Spot  
Sample Date: 12/13/2021 10:24  
Sample Conditions: 114 psig, @ 69 °F Ambient: 60 °F  
Effective Date: 12/13/2021 10:24  
Method: GPA-2261M  
Cylinder No: 5030-04469  
Instrument: 70142339 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 12/13/2021 0:00 AM  
Analyzed: 12/15/2021 08:04:51 by ERG

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	2.642	2.65825	3.226	
Carbon Dioxide	3.583	3.60524	6.875	
Methane	70.128	70.55893	49.046	
Ethane	11.987	12.06063	15.713	3.220
Propane	6.826	6.86788	13.122	1.889
Iso-Butane	0.830	0.83541	2.104	0.273
n-Butane	2.099	2.11171	5.318	0.665
Iso-Pentane	0.403	0.40568	1.268	0.148
n-Pentane	0.415	0.41755	1.305	0.151
Hexanes	0.205	0.20656	0.771	0.085
Heptanes	0.172	0.17306	0.751	0.080
Octanes	0.080	0.08049	0.398	0.041
Nonanes Plus	0.019	0.01861	0.103	0.010
	99.389	100.0000	100.000	6.562

## Calculated Physical Properties

Calculated Molecular Weight	Total	C9+
Compressibility Factor	23.08	128.26
Relative Density Real Gas	0.9960	
	0.7998	4.4283

## GPA 2172 Calculation:

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

Real Gas Dry BTU	1254.7	6974.4
Water Sat. Gas Base BTU	1233.3	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1249.7	6974.4
Ideal, Gross HV - Wet	1227.8	6852.4

Comments: H2S Field Content 0 ppm  
Mcf/day 4254.27

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:** Red Tank 27-28 CTB**Flare Date:** 01/30/2022**Duration of event:** 1 Hour 20 minutes**MCF Flared:** 57**Start Time:** 09:00 AM**End Time:** 10:20 AM**Cause:** Downstream Activity Issue > DCP > DCP Linam Ranch > Facility Issues**Method of Flared Gas Measurement:** Gas Flare Meter

**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. In this case, OXY was not provided with advance notice from DCP or DCP Linam Ranch that unexpected gas restrictions or constraints of their gas service pipeline would occur. DCP Linam Ranch gas plant was experiencing issues within their gas service pipeline system, which caused them to reduce their gas intake volume several times. As a result of the reduction in the gas intake volume from the DCP Linam Ranch gas plant, DCP's associating downstream facilities, restricted their sales gas service system pipeline and the intake of gas from Oxy, which triggered flaring events each time that DCP has facility and/or equipment issues. This situation was out of OXY's control but OXY made every effort to control and minimize emissions as much as possible while DCP & DCP Linam Ranch was down and had restricted/constrained their gas service pipeline to upstream operators. All OXY compression equipment were running at maximized capacity with no issues until DCP and DCP Linam Ranch had facility issues.

**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, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. In this case, the recurring unexpected gas restrictions, or constraints of third-party pipeline operator DCP's sales gas service pipeline, caused by issues at their DCP Linam Ranch greatly impacted the gas flow from Oxy's upstream facility to their sales gas service pipeline which prompted

unexpected immediate spikes in high line pressure within their pipeline, which then triggered several instances of flaring at Oxy's upstream facility. Until DCP and their associating downstream facilities were able to take the volume of gas sent to them, these sudden and unexpected recurring spikes in line pressure forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push its gas into DCP's sales gas system pipeline. All OXY compression equipment were running at maximized capacity until no longer able to do so because of recurring sales gas line constraints/restrictions from DCP and its associating facilities. OXY routed its stranded gas to flare each instance until DCP was able to resume normal working service operations. Additionally, Oxy production techs shut in multiple wells to minimize gas throughput to match and reduce flaring volumes until DCP has resolved their issues and remained on-site, as this is typically an unmanned facility, to ensure instances of flaring were resolved diligently and efficiently.

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

Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of a DCP sales gas service system pipeline constraint/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. DCP's downstream facility issues will re-occur from time to time and may trigger recurring spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When DCP's downstream facility and/or its associating downstream facilities has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, DCP then restricts Oxy's ability to send gas, which then prompts Oxy to route its stranded gas not pushed into the DCP sales 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 to match and reduce flaring volumes during this third-party pipeline operator gas service pipeline shut in as well as continually communicate with DCP personnel throughout these type of situations.

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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**

DEFINITIONS  
  
Action 80317

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 80317
	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: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul>
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QUESTIONS

Action 80317

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 80317
	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	Not answered.
Incident Facility	[fAPP2127030589] RED TANK 27-28 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 withing 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 > Downstream Activity Issue > DCP > DCP Linam Ranch > Facility Issues

<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	71
Nitrogen (N2) percentage, if greater than one percent	3
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	4
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 80317

QUESTIONS (continued)

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:  16696
	Action Number:  80317
	Action Type:  [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	01/30/2022
Time vent or flare was discovered or commenced	09:00 AM
Time vent or flare was terminated	10:20 AM
Cumulative hours during this event	1

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: 57 Mcf   Recovered: 0 Mcf   Lost: 57 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	[229153] DCP MIDSTREAM L.P.
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	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. In this case, OXY was not provided with advance notice from DCP or DCP Linam Ranch that unexpected gas restrictions or constraints of their gas service pipeline would occur. DCP Linam Ranch gas plant was experiencing issues within their gas service pipeline system, which caused them to reduce their gas intake volume several times. As a result of the reduction in the gas intake volume from the DCP Linam Ranch gas plant, DCP's associating downstream facilities, restricted their sales gas service system pipeline and the intake of gas from Oxy, which triggered flaring events each time that DCP has facility and/or equipment issues. This situation was out of OXY's control but OXY made every effort to control and minimize emissions as much as possible while DCP & DCP Linam Ranch was down and had restricted/constrained their gas service pipeline to upstream operators. All OXY compression equipment were running at maximized capacity with no issues until DCP and DCP Linam Ranch had facility issues.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. In this case, the recurring unexpected gas restrictions, or constraints of third-party pipeline operator DCP's sales gas service pipeline, caused by issues at their DCP Linam Ranch greatly impacted the gas flow from Oxy's upstream facility to their sales gas service pipeline which prompted unexpected immediate spikes in high line pressure within their pipeline, which then triggered several instances of flaring at Oxy's upstream facility. Until DCP and their associating downstream facilities were able to take the volume of gas sent to them, these sudden and unexpected recurring spikes in line pressure forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push its gas into DCP's sales gas system pipeline. All OXY compression equipment were running at maximized capacity until no longer able to do so because of recurring sales gas line constraints/restrictions from DCP and its associating facilities. OXY routed its stranded gas to flare each instance until DCP was able to resume normal working service operations.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of a DCP sales gas service system pipeline constraint/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. DCP's downstream facility issues will re-occur from time to time and may trigger recurring spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When DCP's downstream facility and/or its associating downstream facilities has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, DCP then restricts Oxy's ability to send gas, which then prompts Oxy to route its stranded gas not pushed into the DCP sales 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 to match and reduce flaring volumes during this third-party pipeline operator gas service pipeline shut in as well as continually communicate with DCP personnel throughout these type of situations.

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ACKNOWLEDGMENTS

Action 80317

**ACKNOWLEDGMENTS**

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	Action Number: 80317
	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

Action 80317

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	Action Number: 80317
	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.	2/9/2022