



# 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	Sampled By:	Javier Lazo
Station Name:	Red Tank 27-28 CTB Test 2	Sample Of:	Gas Spot
Station Number:	16207T	Sample Date:	12/13/2021 10:24
Station Location:	CTB	Sample Conditions:	114 psig, @ 69 °F Ambient: 60 °F
Sample Point:	Meter	Effective Date:	12/13/2021 10:24
Formation:	Monthly	Method:	GPA-2261M
County:	Lea, NM	Cylinder No:	5030-04469
Type of Sample:	Spot-Cylinder	Instrument:	70142339 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	12/13/2021 0:00 AM
Sampling Method:	Fill and Purge	Analyzed:	12/15/2021 08:04:51 by ERG
Sampling Company:	SPL		

## 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
	<u>99.389</u>	<u>100.00000</u>	<u>100.000</u>	<u>6.562</u>

<b>Calculated Physical Properties</b>	<b>Total</b>	<b>C9+</b>
Calculated Molecular Weight	23.08	128.26
Compressibility Factor	0.9960	
Relative Density Real Gas	0.7998	4.4283

**GPA 2172 Calculation:**

**Calculated Gross BTU per ft³ @ 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:** 02/03/2022

**Duration of event:** 2 Hour 21 minutes

**MCF Flared:** 781

**Start Time:** 06:21 AM

**End Time:** 08:42 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.

---

#### 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, due to hydrate issues which caused their HiLo valve to shut down. DCP's shut down of their HiLo valve then instigated high discharge pressure to occur on the Red Tank 26 Boo compressor station, which in turn caused Oxy's upstream facility, Red Tank 27-28 CTB, to high pressure up, which then triggered a flare event, when Oxy was unable to push its gas into the gas pipeline. 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, by generating a high discharge pressure issue and curbing the intake of gas from Oxy, which triggered a flaring event, that was out of OXY's control.

#### 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, 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, due to hydrate issues which caused their HiLo valve to shut down. DCP's shut down of their HiLo valve then instigated high discharge pressure to occur on the Red Tank 26 Boo compressor station, which in turn caused Oxy's upstream facility, Red Tank 27-28 CTB, to high pressure up, which then triggered a flare event, when Oxy' was unable to push its gas into the gas pipeline. 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, by generating a high discharge pressure issue and curbing the intake of gas from Oxy, which triggered a flaring event, that was out of OXY's control. OXY routed its stranded gas to flare 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 any additional issues were resolved diligently and efficiently. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operational safety and start up procedures to allow some production to occur at this facility, as it was necessary to maintain a minimal amount of gas flow to restart the facility's compression equipment, when DCP was ready and able to start taking gas. The minimal amount of gas flow allowed to be produced and flare was done out of necessity to protect personnel and equipment as a safeguard against potential issues that could occur when restarting production at the Red Tank 27-28 CTB facility.

### **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 spikes 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.

**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**

DEFINITIONS

Action 82376

**DEFINITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 82376
	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.

**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 82376

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 82376
	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, major 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

<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.

**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, Page 2

Action 82376

**QUESTIONS (continued)**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 82376
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Date(s) and Time(s)</b>	
Date vent or flare was discovered or commenced	02/03/2022
Time vent or flare was discovered or commenced	06:21 AM
Time vent or flare was terminated	08:42 AM
Cumulative hours during this event	2

<b>Measured or Estimated Volume of Vented or Flared Natural Gas</b>	
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 781 Mcf   Recovered: 0 Mcf   Lost: 781 Mcf ]
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Gas Flare Report
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.

<b>Venting or Flaring Resulting from Downstream Activity</b>	
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.

<b>Steps and Actions to Prevent Waste</b>	
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, due to hydrate issues which caused their HiLo valve to shut down. DCP's shut down of their HiLo valve then instigated high discharge pressure to occur on the Red Tank 26 Boo compressor station, which in turn caused Oxy's upstream facility, Red Tank 27-28 CTB, to high pressure up, which then triggered a flare event, when Oxy was unable to push its gas into the gas pipeline. 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, by generating a high discharge pressure issue and curbing the intake of gas from Oxy, which triggered a flaring event, that was out of OXY's control.
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, 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, due to hydrate issues which caused their HiLo valve to shut down. DCP's shut down of their HiLo valve then instigated high discharge pressure to occur on the Red Tank 26 Boo compressor station, which in turn caused Oxy's upstream facility, Red Tank 27-28 CTB, to high pressure up, which then triggered a flare event, when Oxy' was unable to push its gas into the gas pipeline. 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 pipeline, by generating a high discharge pressure issue and curbing the intake of gas from Oxy, which triggered a flaring event, that was out of OXY's control. OXY routed its stranded gas to flare 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 spikes 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.

**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**

ACKNOWLEDGMENTS

Action 82376

**ACKNOWLEDGMENTS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 82376
	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.

**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**

CONDITIONS  
 Action 82376

**CONDITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 82376
	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.	2/17/2022