



ENERGY TRANSFER

Meter Analysis Summary Report

Contract Month: **03/01/2021**Meter Num: **63436**

Meter Name: WEST DOLLARHIDE DEVONIAN CDP

| | | | | | |
|------------------|---------------|-----------------|----------------------|----------|-------------|
| Energy Basis: | Dry | Effective Date: | 1/1/21 7:00 | C5P: | 1.60 |
| Press Base: | 14.73 | Valid Thru: | 1/18/38 21:14 | C6P: | 0.77 |
| Contract Hour: | 7 | Sample Date: | 1/18/2021 | C5P_GPM: | 0.60 |
| Gravity: | 1.4622 | Analyzed Date: | 1/26/2021 | C6P_GPM: | 0.29 |
| HV Dry: | 325.1 | Sample Press: | 55.4 | | |
| HV Sat: | 325.0 | Sample Temp: | 37.9 | | |
| HV As-Delivered: | 325.1 | | | | |

| Mol % | | GPM |
|------------------|----------|--------|
| Methane (C1): | 5.6976 | |
| Ethane (C2): | 2.8203 | 0.7586 |
| Propane (C3): | 3.3385 | 0.9251 |
| i-Butane (iC4): | 0.3645 | 0.1200 |
| n-Butane (nC4): | 1.5804 | 0.5011 |
| i-Pentane (iC5): | 0.3323 | 0.1222 |
| n-Pentane (nC5): | 0.4980 | 0.1816 |
| Hexane (C6): | 0.6674 | 0.2929 |
| Heptane (C7): | | |
| Octane (C8): | | |
| Nonane (C9): | | |
| Decane (C10): | | |
| Nitrogen: | 1.7866 | |
| CO2: | 81.0738 | |
| H2S: | 0.0983 | |
| H2O: | 1.7424 | |
| HE: | | |
| H2: | | |
| | <hr/> | <hr/> |
| | 100.0000 | 2.9527 |

3/29/2021 11:13:41 AM

WDDU VENTING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: West Dollarhide Devonian Unit Battery

Vent Date: 09/20/2021

Duration of event: >8 hours/day

MCF Vented: 115

Start Time: 12:00 AM

End Time: 11:59 PM

Cause: Downstream Activity Issue > Enterprise > 3rd Party Operator Gas System Service Pipeline Restrictions

Method of Flared Gas Measurement: Vent Gas Meter

Comments: 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.

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

On May 17, 2021, NMOCD issued a notice entitled, “Frequently Asked Questions Regarding the Natural Gas Waste Rules,” and states that “... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129.”

Third-party pipeline operator, Energy Transfer, continually has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer’s gas pressure limit pipeline restriction greatly impacts Oxy’s ability to push its gas into their sales gas service system pipeline.

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

On May 17, 2021, NMOCD issued a notice entitled, “Frequently Asked Questions Regarding the Natural Gas Waste Rules,” and states that “... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129.”

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. In this circumstance, the sales gas is too rich in CO2 to burn via a flare, therefore the sales gas is vented, yet solely when Energy Transfer has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer’s gas flow pressure limit pipeline restriction greatly impacts Oxy’s ability to push its gas into their sales gas service pipeline. Venting does not occur until Energy Transfer begins restricting their gas service volume to Oxy and ceases when Energy Transfer resumes normal working service with no gas flow pressure limit restrictions.

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

On May 17, 2021, NMOCD issued a notice entitled, “Frequently Asked Questions Regarding the Natural Gas Waste Rules,” and states that “... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129.”

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Energy Transfer 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.

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District III
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District IV
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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 89477

DEFINITIONS

| | |
|--|---|
| Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294 | OGRID: 16696 |
| | Action Number: 89477 |
| | Action Type: [C-129] Amend Venting and/or Flaring (C-129A) |

DEFINITIONS

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|--|
| 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">• 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 89477

QUESTIONS

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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 Operator | [16696] OXY USA INC |
| Incident Type | Flare |
| Incident Status | Closure Approved |
| Incident Well | Not answered. |
| Incident Facility | [fAPP2127064958] W DOLLARHIDE DEV UNIT BATTERY |
| Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application. | |

| | |
|---|---|
| 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 | No |
| 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. |
| 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 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 | Other (Specify) |
| Additional details for Equipment Involved. Please specify | Vent Gas Meter - 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. |

| | |
|--|-----|
| 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 | 6 |
| Nitrogen (N2) percentage, if greater than one percent | 2 |
| Hydrogen Sulfide (H2S) PPM, rounded up | 983 |
| Carbon Dioxide (C02) percentage, if greater than one percent | 81 |
| 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 | 0 |
| Nitrogen (N2) percentage quality requirement | 0 |
| Hydrogen Sufide (H2S) PPM quality requirement | 0 |
| Carbon Dioxide (C02) percentage quality requirement | 0 |
| Oxygen (O2) percentage quality requirement | 0 |

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QUESTIONS, Page 2

Action 89477

QUESTIONS (continued)

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QUESTIONS

| Date(s) and Time(s) | |
|--|------------|
| Date vent or flare was discovered or commenced | 09/20/2021 |
| 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 | Cause: Other Other (Specify) Natural Gas Vented Released: 115 Mcf Recovered: 0 Mcf Lost: 115 Mcf] |
| Natural Gas Flared (Mcf) Details | Not answered. |
| Other Released Details | Not answered. |
| Additional details for Measured or Estimated Volume(s). Please specify | Vent Gas 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 | [316048] ENERGY TRANSFER PARTNERS, LP |
| Date notified of downstream activity requiring this vent or flare | 01/01/1900 |
| 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 | On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Third-party pipeline operator, Energy Transfer, continually has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service system pipeline. |
| Steps taken to limit the duration and magnitude of vent or flare | On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." 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. In this circumstance, the sales gas is too rich in CO2 to burn via a flare, therefore the sales gas is vented, yet solely when Energy Transfer has unexpected and reasonably unforeseeable gas flow pressure limits restrictions on their gas service system pipeline, which is downstream of OXY's custody point and control. Energy Transfer's gas flow pressure limit pipeline restriction greatly impacts Oxy's ability to push its gas into their sales gas service pipeline. Venting does not occur until Energy Transfer begins restricting their gas service volume to Oxy and ceases when Energy Transfer resumes normal working service with no gas flow pressure limit restrictions. |
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare | On May 17, 2021, NMOCD issued a notice entitled, "Frequently Asked Questions Regarding the Natural Gas Waste Rules," and states that "... pursuant to 19.15.27.8(G) NMAC, an operator who vents or flares for any reason and that lasts more than 8 hours cumulatively during any 24-hour period must report that event on Form C-129." Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Energy Transfer 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. |

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ACKNOWLEDGMENTS

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|-------------------------------------|---|
| <input checked="" type="checkbox"/> | I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC. |
| <input checked="" type="checkbox"/> | I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record. |
| <input checked="" type="checkbox"/> | I hereby certify the statements in this amending 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

| Created By | Condition | Condition Date |
|---------------|--|----------------|
| shelbyschoepf | If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event. | 3/11/2022 |