



Certificate of Analysis

Number: 6030-22030204-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Mar. 14, 2022

Field: Turkey Track
Station Name: Turkey Track CTB Sales Check
Station Number: 14670c
Sample Point: Meter
Meter Number:
County: Eddy
Type of Sample: Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: Fill and Purge
Sampling Company: OXY

Sampled By: Michael Mirabal
Sample Of: Gas Spot
Sample Date: 03/10/2022 01:30
Sample Conditions: 700 psig, @ 94 °F Ambient: 48 °F
Effective Date: 03/10/2022 01:30
Method: GPA-2261M
Cylinder No: 1111-007242
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 03/14/2022 0:00 AM
Analyzed: 03/14/2022 11:13:54 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.885
Nitrogen	2.063	2.067	2.716		GPM TOTAL C3+	2.745
Methane	76.682	76.849	57.818		GPM TOTAL iC5+	0.478
Carbon Dioxide	0.216	0.216	0.446			
Ethane	11.740	11.766	16.592	3.140		
Propane	5.541	5.553	11.484	1.527		
Iso-butane	0.686	0.687	1.873	0.224		
n-Butane	1.637	1.641	4.473	0.516		
Iso-pentane	0.369	0.370	1.252	0.135		
n-Pentane	0.377	0.378	1.279	0.137		
Hexanes Plus	0.472	0.473	2.067	0.206		
	99.783	100.000	100.000	5.885		

Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7386	3.2176
Calculated Molecular Weight	21.32	93.19
Compressibility Factor	0.9964	

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1255	5113
Water Sat. Gas Base BTU	1233	5024
Ideal, Gross HV - Dry at 14.65 psia	1250.3	5113.2
Ideal, Gross HV - Wet	1228.4	5023.7
Net BTU Dry Gas - real gas	1139	
Net BTU Wet Gas - real gas	1119	

Comments: H₂S Field Content 0 ppm
Mcf/day 9365

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:** Turkey Track CTB**Flare Date:** 03/09/2022**Duration of event:** 1 Hour 40 Minutes**MCF Flared:** 825**Start Time:** 11:20 AM**End Time:** 01:00 PM**Cause:** Enterprise Pigging > High Line Pressure > Compressor Malfunction > NGSG > Recycle Skid Set Points > High Line Pressure**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, Turkey Track CTB started experiencing high sales line pressure due to downstream operator, Enterprise, pigging their pipelines. It was due to this downstream activity, that specific compression equipment began to malfunction due to certain set points within the compressor unit were altered by the compression unit's owner, NGSG, without authorization from Oxy nor informing OXY personnel that such changes were done. NGSG sales gas compressor unit #3 and #4 had started to recycle on skid once high line pressure reached 700psig on the sales gas service system pipeline. The recycle set points on the sales compressors were changed by NGSG to a lower level without any authorization to do so, which triggered a flaring event to occur when Enterprise started pigging their lines and caused high line pressure to transpire. This flaring event is out of Oxy's control because had NGSG communicated to OXY personnel about the altering of the recycle set points on the skid to a lower level, OXY personnel would not have approved those changes and would have insisted that the recycle skid set points be raised to a higher level to handle brief amounts of high line pressure on the Enterprise sales gas service system pipeline. Oxy personnel quickly contacted NGSG personnel regarding the issue and then quickly had an Oxy compression tech come out to the facility to reset the recycle set points on the skid to its original set point of 850PSIG. NGSG was advised that any changes to set points on the compression equipment must be approved by OXY prior to any changes being made.

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, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, Turkey Track CTB started experiencing high sales line pressure due to downstream operator, Enterprise, pigging their pipelines. It was due to this downstream activity, that specific compression equipment began to malfunction due to certain set points within the compressor unit were altered by the compression unit's owner, NGSG, without authorization from Oxy nor informing OXY personnel that such changes

were done. NGSG sales gas compressor unit #3 and #4 had started to recycle on skid once high line pressure reached 700psig on the Enterprise sales gas service system pipeline. The recycle set points on the sales compressors were changed by NGSG to a low level set point without any authorization to do so, which triggered a flaring event to occur when Enterprise started pigging their lines and caused high line pressure to transpire. An Oxy production tech was on-site when flaring began, and quickly started the steps to determine its cause. While the production tech was walking through the compressor skids, it was noticed that the recycle valves on NGSG gas compressor units #3 and #4 were wide open. The Oxy Production tech immediately contacted additional Oxy personnel to divert or offload gas from Enterprise to DCP. The Oxy production then quickly began to shut the manual valve on the recycle line on gas compressor units #3 and #4 until an OXY compression tech arrived to reset the recycle set points on the skid back to 850PSIG. Once the manual valves were shut in on NGSG gas compressor units #3 and #4, which took some time, did flaring cease.

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

The corrective actions taken to eliminate the cause and reoccurrence of flaring in this type of circumstance is for Oxy to have better communication between third party compression owner, NGSG, and Oxy personnel, when set points are changed and to gain Oxy approval prior to any altering of set points.

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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

DEFINITIONS

Action 92736

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 92736
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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">• 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 92736

QUESTIONS

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	Action Number: 92736
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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 Operator	[192463] OXY USA WTP LIMITED PARTNERSHIP
Incident Type	Flare
Incident Status	Closure Not Approved
Incident Well	Not answered.
Incident Facility	[fAPP2126265645] TURKEY TRACK CTB

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

Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.

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.

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 within 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 > Enterprise Pigging > High Line Pressure > Compressor Malfunction > NGSG > Recycle Skid Set Points > High Line Pressure

Representative Compositional Analysis of Vented or Flared Natural Gas

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

Methane (CH4) percentage	77
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	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.

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QUESTIONS, Page 2

Action 92736

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	03/09/2022
Time vent or flare was discovered or commenced	11:20 AM
Time vent or flare was terminated	01:00 PM
Cumulative hours during this event	2

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: 825 Mcf Recovered: 0 Mcf Lost: 825 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	No
Was notification of downstream activity received by this operator	Not answered.
Downstream OGRID that should have notified this operator	Not answered.
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	Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, Turkey Track CTB started experiencing high sales line pressure due to downstream operator, Enterprise, pigging their pipelines. It was due to this downstream activity, that specific compression equipment began to malfunction due to certain set points within the compressor unit were altered by the compression unit's owner, NGSG, without authorization from Oxy nor informing OXY personnel that such changes were done. NGSG sales gas compressor unit #3 and #4 had started to recycle on skid once high line pressure reached 700psig on the sales gas service system pipeline. The recycle set points on the sales compressors were changed by NGSG to a lower level without any authorization to do so, which triggered a flaring event to occur when Enterprise started pigging their lines and caused high line pressure to transpire. This flaring event is out of Oxy's control because had NGSG communicated to OXY personnel about the altering of the recycle set points on the skid to a lower level, OXY personnel would not have approved those changes and would have insisted that the recycle skid set points be raised to a higher level to handle brief amounts of high line pressure on the Enterprise sales gas service system pipeline. Oxy personnel quickly contacted NGSG personnel regarding the issue and then quickly had an Oxy compression tech come out to the facility to reset the recycle set points on the skid to its original set point of 850PSIG. NGSG was advised that any changes to set points on the compression equipment must be approved by OXY prior to any changes being made.
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, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, Turkey Track CTB started experiencing high sales line pressure due to downstream operator, Enterprise, pigging their pipelines. It was due to this downstream activity, that specific compression equipment began to malfunction due to certain set points within the compressor unit were altered by the compression unit's owner, NGSG, without authorization from Oxy nor informing OXY personnel that such changes were done. NGSG sales gas compressor unit #3 and #4 had started to recycle on skid once high line pressure reached 700psig on the Enterprise sales gas service system pipeline. The recycle set points on the sales compressors were changed by NGSG to a low level set point without any authorization to do so, which triggered a flaring event to occur when Enterprise started pigging their lines and caused high line pressure to transpire. An Oxy production tech was on-site when flaring began, and quickly started the steps to determine its cause. While the production tech was walking through the compressor skids, it was noticed that the recycle valves on NGSG gas compressor units #3 and #4 were wide open. The Oxy Production tech immediately contacted additional Oxy personnel to divert or offload gas from Enterprise to DCP. The Oxy production then quickly began to shut the manual valve on the recycle line on gas compressor units.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	The corrective actions taken to eliminate the cause and reoccurrence of flaring in this type of circumstance is for Oxy to have better communication between third party compression owner, NGSG, and Oxy personnel, when set points are changed and to gain Oxy approval prior to any altering of set points.

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ACKNOWLEDGMENTS

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	Action Number: 92736
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ACKNOWLEDGMENTS

<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

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	Action Number: 92736
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

CONDITIONS

Created By	Condition	Condition Date
marialuna2	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.	3/23/2022