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EXTENDED GAS REPORT
SUMMARY OF CHROMATOGRAPHIC ANALYSIS

Sample Name:	Red Tank 19 CGL Fuel Skid Inlet	**For:**	14903G
Sample Date:	08/31/2022	**Identification:**	2022057899
Sampled By:	CM	**Company:**	Oxy
Time Sampled:	12:25	**Analysis Date:**	09/13/2022
Sample Temp:	0.0 F	**Analysis By:**	BH
Sample Press:	1248.0 **H2S (PPM) =** 18.0	**Data File:**	LS_7336.D

Component	Mole%	GPM REAL	GPM IDEAL
H2S	0.002		
Nitrogen	2.184		
Methane	72.608		
CO2	5.976		
Ethane	9.797	2.619	2.613
Propane	5.149	1.418	1.415
Isobutane	0.673	0.220	0.220
N-Butane	1.701	0.536	0.535
Isopentane	0.444	0.162	0.162
N-Pentane	0.478	0.173	0.173
Hexanes	0.374	0.152	0.395
Heptanes	0.381	0.142	0.142
Octanes	0.187	0.081	0.081
Nonanes+	0.046	0.023	0.022
Total	100.000	5.526	5.513

*HEXANES PLUS SUMMARY

AVG MOLE WT	91.474
API GRAVITY @ 60F	63.1
SPECIFIC GRAVITY	
AIR = 1 (IDEAL):	3.146
H2O = 1 (IDEAL):	0.727

COMPONENT RATIOS

HEXANES	(C6)	MOLE%	37.509
HEPTANES	(C7)	MOLE%	38.570
OCTANES	(C8)	MOLE%	18.765
NONANES+	(C9)	MOLE%	5.156
HEXANES	(C6)	WT%	34.942
HEPTANES	(C7)	WT%	37.431
OCTANES	(C8)	WT%	20.682
NONANES+	(C9)	WT%	6.945

CALCULATED PARAMETERS

TOTAL ANALYSIS SUMMARY

MOLE WT:	23.056
VAPOR PRESS PSIA:	3720.1
SPECIFIC GRAVITY	
AIR = 1 (REAL):	0.7986
AIR = 1 (IDEAL):	0.7958
H2O = 1 (IDEAL):	0.383
REPORTED BASIS:	14.73
Unnormalized Total:	96.992

HEATING VALUE

BTU/CUFT (DRY)	1206.6
BTU/CUFT (WET)	1186.1

BTEX SUMMARY

WT% BENZENE	6.908
WT% TOLUENE	5.756
WT% E BENZENE	0.471
WT% XYLENES	1.531

LAB MANAGER

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Constants: GPA 2145
Method: GPA 2286.m

Report Rev 17-11.16
Template: eC6+ Gas

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Red Tank 19 CGL **Date:** 11/27/2022

Duration of event: 4 Hours **MCF Flared:** 50

Start Time: 01:00 PM **End Time:** 05:00 PM

Cause: Facility Equipment Issues > VRU's > Low Oil Pressure

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This upset event was not caused by any wells associated with the facility.

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

This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon facility equipment malfunctions and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of multiple VRU equipment malfunctions caused by low oil pressure. Notwithstanding facility design and operation, emergencies and unexpected equipment malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable, even with proper preventative maintenance care. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Internal OXY procedures ensure that upon facility equipment malfunctions and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible. 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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of multiple VRU equipment malfunctions caused by low oil pressure. Unfortunately, Oxy's third party vendor for this equipment, Hy-Bon, was unable to dispatch a repairman to resolve the issue in a timely manner, as they were overwhelmed with other troubleshooting calls in the area. Once Hy-Bon's repairman was able to arrive on-site, he was able to troubleshoot the VRU equipment, resolve the malfunctions and bring the equipment back to normal working order. This event could not have been foreseen, avoided or planned for as vapor recovery unit equipment design and operations are inherently dynamic and even the smallest alarms, false or true, can be sudden,

reasonably unforeseeable and unexpected. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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

Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of this type of equipment malfunction as notwithstanding vapor recovery unit operating equipment design and operations, they are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected. The only action that Oxy can take is to continue with the equipment preventative maintenance program for this facility. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 167179
	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.

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QUESTIONS

Action 167179

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 167179
	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	*Unavailable.*
Incident Facility	**[fAPP2127357918] RED TANK 19 CGL**

Determination of Reporting Requirements	
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional 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, 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	Facility Equipment Issues > VRU's > Low Oil 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	73
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (C02) percentage, if greater than one percent	6
Oxygen (02) 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 Sufide (H2S) PPM quality requirement	*Not answered.*
Carbon Dioxide (C02) percentage quality requirement	*Not answered.*
Oxygen (02) percentage quality requirement	*Not answered.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 167179
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	11/27/2022
Time vent or flare was discovered or commenced	01:00 PM
Time vent or flare was terminated	05:00 PM
Cumulative hours during this event	4

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other | Other (Specify) | Natural Gas Vented | Released: 50 Mcf | Recovered: 0 Mcf | Lost: 50 Mcf.
Natural Gas Flared (Mcf) Details	*Not answered.*
Other Released Details	*Not answered.*
Additional details for Measured or Estimated Volume(s). Please specify	Estimated Vent Calculations
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	This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon facility equipment malfunctions and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of multiple VRU equipment malfunctions caused by low oil pressure. Notwithstanding facility design and operation, emergencies and unexpected equipment malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable, even with proper preventative maintenance care. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Internal OXY procedures ensure that upon facility equipment malfunctions and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible. 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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of multiple VRU equipment malfunctions caused by low oil pressure. Unfortunately, Oxy's third party vendor for this equipment, Hy-Bon, was unable to dispatch a repairman to resolve the issue in a timely manner, as they were overwhelmed with other troubleshooting calls in the area. Once Hy-Bon's repairman was able to arrive on-site, he was able to troubleshoot the VRU equipment, resolve the malfunctions and bring the equipment back to normal working order. This event could not have been foreseen, avoided or planned for as vapor recovery unit equipment design and operations are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.
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ACKNOWLEDGMENTS

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	Action Number: 167179
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	I acknowledge that I am authorized to submit a *Venting and/or Flaring* (C-129) report on behalf of this operator and understand that this report can be **a complete** C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
☑	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.
☑	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.
☑	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.
☑	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 167179

CONDITIONS

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	Action Number: 167179
	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.	12/14/2022