



Certificate of Analysis

Number: 6030-23020179-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Feb. 17, 2023

Field: Turkey Track
Station Name: Turkey Track CGL Fuel Scrubber #1
Station Number:
Station Location: Comp station
Sample Point: Meter
Formation: Spot
County: Eddy, NM
Type of Sample: : Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Raul Salazar
Sample Of: Gas Spot
Sample Date: 02/16/2023
Sample Conditions: 130 psig Ambient: 48 °F
Effective Date: 02/16/2023
Method: GPA-2261M
Cylinder No: 5030-03520
Instrument: 70104251 (Inficon GC-MicroFusion)
Last Inst. Cal.: 02/14/2023 0:00 AM
Analyzed: 02/17/2023 08:40:33 by EBH

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	0.00025	NIL	
Nitrogen	1.413	1.42632	1.870	
Carbon Dioxide	0.233	0.23547	0.485	
Methane	76.637	77.38137	58.102	
Ethane	11.771	11.88493	16.726	3.172
Propane	5.451	5.50364	11.359	1.513
Iso-Butane	0.665	0.67176	1.827	0.219
n-Butane	1.549	1.56415	4.255	0.492
Iso-Pentane	0.338	0.34118	1.152	0.125
n-Pentane	0.328	0.33149	1.119	0.120
Hexanes	0.216	0.21769	0.878	0.089
Heptanes	0.247	0.24940	1.170	0.115
Octanes	0.148	0.14944	0.799	0.076
Nonanes Plus	0.043	0.04291	0.258	0.024
	99.039	100.0000	100.000	5.945

Calculated Physical Properties

Calculated Molecular Weight	Total	C9+
Compressibility Factor	21.37	128.26
Relative Density Real Gas	0.9963	
	0.7402	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1267.3	6974.4
Water Sat. Gas Base BTU	1245.6	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1262.6	6974.4
Ideal, Gross HV - Wet	1240.5	6852.4

Comments: H₂S Field Content 2.5 ppm

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:** 04/02/2023**Duration of event:** 21 Minutes**MCF Flared:** 56**Start Time:** 01:20 PM**End Time:** 01:41 PM**Cause:** Emergency Flare > Third Party Downstream Activity > Enterprise > High Line Pressure**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:**

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 compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, 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, Enterprise, third party owned and operated downstream pipeline operator, had unexpected high line pressure issues within their sales gas pipeline, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.

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. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. In this case, Enterprise, third party owned and operated downstream pipeline operator, had unexpected high line pressure issues within their sales gas pipeline, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise. As soon as flaring was triggered, the facility's mitigation optimizer cut its injection rates to wells in the field to decrease injection and sales gas to reduce field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. 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 unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise's downstream facilities and associated facilities may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to continually communicate with Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

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District II
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District III
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District IV
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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 208326

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 208326
	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 208326

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 208326
	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	[fAPP2126265645] TURKEY TRACK CTB

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, 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 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 > Third Party Downstream Activity > Enterprise > 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	1
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

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QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	04/02/2023
Time vent or flare was discovered or commenced	01:20 PM
Time vent or flare was terminated	01:41 PM
Cumulative hours during this event	0

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: 56 Mcf Recovered: 0 Mcf Lost: 56 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	[713731] Enterprise Crude Pipeline LLC
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 compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, 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, Enterprise, third party owned and operated downstream pipeline operator, had unexpected high line pressure issues within their sales gas pipeline, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.
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. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. In this case, Enterprise, third party owned and operated downstream pipeline operator, had unexpected high line pressure issues within their sales gas pipeline, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise. As soon as flaring was triggered, the facility's mitigation optimizer cut its injection rates to wells in the field to decrease injection and sales gas to reduce field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise's downstream facilities and associated facilities may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to continually communicate with Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

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ACKNOWLEDGMENTS

☒	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 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

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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.	4/17/2023