



Certificate of Analysis

Number: 6030-22030204-001A

Artesia Laboratory

200 E Main St.
Artesia, NM 88210
Phone 575-746-3481Chandler 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: OXYSampled 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:** 09/18/2023**Duration of event:** 24 Minutes**MCF Flared:** 67**Start Time:** 09:16 AM**End Time:** 09:40 AM**Cause:** Emergency Flare > Compression Equipment Malfunctions > Turkey Track CGL > Gas Lift Compressor Units # 2, # 3 & # 4**Method of Flared Gas Measurement:** Gas Flare Meter**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 by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, gas lift compressor units # 2, # 3, and # 4, at the Turkey Track CGL facility, suddenly and unexpectedly malfunctioned due to detonation and automatically shut down, one right after the other, which in turn caused the Turkey Track CTB facility to pressure up and triggered a flaring event. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Compressor engines are designed to operate in a precise manner and when detonation occurs, it disrupts the gas compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. Compressor malfunctions can occur without warning and therefore, Oxy is unable to predict, avoid or prevent this type of malfunction from occurring. This malfunctioning event is out of OXY's control. 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. 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, gas lift compressor units # 2, # 3, and # 4, at the Turkey Track CGL facility, suddenly and unexpectedly malfunctioned due to detonation and automatically shut down, one right after the other, which in

turn caused the Turkey Track CTB facility to pressure up and triggered a flaring event. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Compressor engines are designed to operate in a precise manner and when detonation occurs, it disrupts the gas compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. Compressor malfunctions can occur without warning and therefore, Oxy is unable to predict, avoid or prevent this type of malfunction from occurring. 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, while Oxy production techs restarted the compressors at the CGL. 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 to eliminate this type of cause and potential reoccurrence of flaring as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate all its facility locations equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to continue with its compression equipment preventative maintenance program for all its facilities and continually work with its compression rental owners to resolve those issues in a timely manner, should they occur suddenly and without warning.

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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 279238

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 279238
	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: • 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 279238

QUESTIONS

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	Action Number: 279238
	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 Approved
Incident Well	Unavailable.
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, 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	Yes

Equipment Involved

Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Compression Equipment Malfunctions > Turkey Track CGL > Gas Lift Compressor Units # 2, # 3 & # 4

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	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sulfide (H2S) PPM quality requirement	0
Carbon Dioxide (CO2) percentage quality requirement	0
Oxygen (O2) percentage quality requirement	0

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QUESTIONS, Page 2

Action 279238

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	09/18/2023
Time vent or flare was discovered or commenced	09:16 AM
Time vent or flare was terminated	09:40 AM
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: 67 MCF Recovered: 0 MCF Lost: 67 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	No
Downstream OGRID that should have notified this operator	0
Date notified of downstream activity requiring this vent or flare	
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 by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, gas lift compressor units # 2, # 3, and # 4, at the Turkey Track CGL facility, suddenly and unexpectedly malfunctioned due to detonation and automatically shut down, one right after the other, which in turn caused the Turkey Track CTB facility to pressure up and triggered a flaring event. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Compressor engines are designed to operate in a precise manner and when detonation occurs, it disrupts the gas compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit. Compressor malfunctions can occur without warning and therefore, Oxy is unable to predict, avoid or prevent this type of malfunction from occurring. This malfunctioning event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible. 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

Steps taken to limit the duration and magnitude of vent or flare	assist other personnel on-site for maintenance purposes. 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, gas lift compressor units # 2, # 3, and # 4, at the Turkey Track CGL facility, suddenly and unexpectedly malfunctioned due to detonation and automatically shut down, one right after the other, which in turn caused the Turkey Track CTB facility to pressure up and triggered a flaring event. Notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Compressor engines are designed to operate in a precise manner and when detonation occurs, it disrupts the gas compressor's operating manner and cuts off engine power, which in turn, prompts an automatic shutdown of the unit.
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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	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.
☒	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.
☒	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.
☒	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
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.	10/25/2023