



## Certificate of Analysis

Number: 6030-24010273-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Jan. 25, 2024

Field: PERMIAN\_RESOURCES  
Station Name: Iridium Satellite Train Check (FMP)  
Station Number: 17561C  
Station Location: OP-L2150-ST001  
Sample Point: Meter  
Formation: NEW\_MEXICO  
County:  
Well Name: CTB  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge  
Sampling Company: : OXY

Sampled By: JE  
Sample Of: Gas Spot  
Sample Date: 01/24/2024 13:05  
Sample Conditions: 89 psig, @ 74 °F Ambient: 63 °F  
Effective Date: 01/24/2024 13:05  
Flow Rate: 8837 MSCFD  
Method: GPA-2261M  
Cylinder No: 5030-02361  
Instrument: 70104251 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 01/22/2024 0:00 AM  
Analyzed: 01/25/2024 12:11:03 by EBH

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	0.0000	0.0000	0.0000	
Nitrogen	1.7490	1.7862	2.2511	
Carbon Dioxide	2.6147	2.6703	5.2870	
Methane	72.3123	73.8488	53.2991	
Ethane	11.6481	11.8956	16.0920	3.175
Propane	5.9808	6.1079	12.1169	1.680
Iso-Butane	0.6953	0.7101	1.8568	0.232
n-Butane	1.6937	1.7297	4.5229	0.544
Iso-Pentane	0.3618	0.3695	1.1994	0.135
n-Pentane	0.3931	0.4015	1.3032	0.145
Hexanes	0.2230	0.2277	0.8828	0.093
Heptanes	0.1767	0.1805	0.8137	0.083
Octanes	0.0645	0.0659	0.3387	0.034
Nonanes Plus	0.0062	0.0063	0.0364	0.004
	97.9192	100.0000	100.0000	6.125

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.23	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7701	4.4283

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1246.6	6974.4
Water Sat. Gas Base BTU	1225.3	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1241.9	6974.4
Ideal, Gross HV - Wet	1220.1	6852.4

Comments: H2S Field Content 0 ppm  
FMP/LSE NMNM38464, WO#4001560848

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:** NC 28 Iridium Sat**Flare Date:** 08/21/2024**Duration of Event:** 46 Minutes**MCF Flared:** 65**Start Time:** 07:03 AM**End Time:** 07:49 AM**Cause:** Emergency Flare > Third Party Downstream Activity > Enterprise > Central Station > Emergency Shutdown > Gas Detection Alarm**Method of Flared Gas Measurement:** Gas Flare Meter

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**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 instance, the flaring event was initiated by a sudden and unannounced stoppage of sales gas flow intake from OXY. This issue originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational and gas detection alarm difficulties at their Central station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the emergency shutdown happening on their end. This lack of communication and information significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification to Oxy personnel, field and operation personnel would have adjusted and balanced the wells to reduce the amount of gas being sent to the facility and to sales, which in turn would have mitigated the chance of a flaring event from occurring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.

**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 instance, the flaring event was initiated by a sudden and unannounced stoppage of sales gas flow intake from OXY. This issue originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational and gas detection alarm difficulties at their Central station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the emergency shutdown happening on their end. This lack of communication and information significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations

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

Oxy is not in a position to implement corrective measures to address the root cause and prevent future incidents of a gas flow restriction, shut-in or suspension in the Enterprise offload sales gas pipeline, since this matter is beyond Oxy's custody transfer point and outside of Oxy's capacity to correct or keep from happening again. When Enterprise and its operations face challenges managing the volume of gas flow from Oxy, it then limits Oxy's ability to push forward with its sales gas transmission, which in turn, prompts Oxy to flare its excess gas. Oxy is committed to minimizing emissions as much as possible and aims to maintain open communication with its downstream and midstream operators, when feasible, to handle such events effectively.

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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 384105

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 384105
	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: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul>
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QUESTIONS

Action 384105

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 384105
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

<b>Prerequisites</b> 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	[fAPP2126659962] IRIDIUM SATELLITE

<b>Determination of Reporting Requirements</b> 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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Third Party Downstream Activity > Enterprise > Central Station > Emergency Shutdown > Gas Detection Alarm

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b> Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	74
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	3
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 Sufide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (C02) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

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QUESTIONS, Page 2  
  
Action 384105

**QUESTIONS (continued)**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:
	16696
	Action Number:
	384105
Action Type:	
[C-129] Venting and/or Flaring (C-129)	

**QUESTIONS**

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	08/21/2024
Time vent or flare was discovered or commenced	07:03 AM
Time vent or flare was terminated	07:49 AM
Cumulative hours during this event	1

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: 65 Mcf   Recovered: 0 Mcf   Lost: 65 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 compressor 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 instance, the flaring event was initiated by a sudden and unannounced stoppage of sales gas flow intake from OXY. This issue originated from Enterprise, a thirdparty downstream offloading operator, which was experiencing operational and gas detection alarm difficulties at their Central station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the emergency shutdown happening on their end. This lack of communication and information significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification to Oxy personnel, field and operation personnel would have adjusted and balanced the wells to reduce the amount of gas being sent to the facility and to sales, which

	<p>in turn would have mitigated the chance of a flaring event from occurring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.</p>
Steps taken to limit the duration and magnitude of vent or flare	<p>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 instance, the flaring event was initiated by a sudden and unannounced stoppage of sales gas flow intake from OXY. This issue originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational and gas detection alarm difficulties at their Central station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the emergency shutdown happening on their end. This lack of communication and information significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification to Oxy personnel, field and operation personnel would have adjusted and balanced the wells to reduce the amount of gas being sent to the facility and to sales, which in turn would have mitigated the chance of a flaring event from occurring. As soon as flaring was triggered, Oxy production techs choked back several wells and the field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area so that field pressure would stay below the flare trigger setpoints of the facility to cease flaring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.</p>
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	<p>Oxy is not in a position to implement corrective measures to address the root cause and prevent future incidents of a gas flow restriction, shut-in or suspension in the Enterprise offload sales gas pipeline, since this matter is beyond Oxy's custody transfer point and outside of Oxy's capacity to correct or keep from happening again. When Enterprise and its operations face challenges managing the volume of gas flow from Oxy, it then limits Oxy's ability to push forward with its sales gas transmission, which in turn, prompts Oxy to flare its excess gas. Oxy is committed to minimizing emissions as much as possible and aims to maintain open communication with its downstream and midstream operators, when feasible, to handle such events effectively.</p>

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ACKNOWLEDGMENTS

Action 384105

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	Action Number: 384105
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	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 <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<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

Action 384105

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CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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.	9/16/2024