



Certificate of Analysis

Number: 6030-23120311-001A

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. 11, 2024

Field: PERMIAN_RESOURCES
Station Name: Sand Dunes CTB Check
Station Number: 17000C
Station Location: OP-L0901-BT002
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: 12/28/2023 09:20
Sample Conditions: 88 psig, @ 68 °F Ambient: 31 °F
Effective Date: 12/28/2023 09:20
Flow Rate: 17996 MSCFD
Method: GPA-2261M
Cylinder No: 5030-01063
Instrument: 70104251 (Inficon GC-MicroFusion)
Last Inst. Cal.: 01/09/2024 0:00 AM
Analyzed: 01/09/2024 08:30:50 by EBH

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	0.0000	0.0000	0.0000	
Nitrogen	1.2725	1.3037	1.5990	
Carbon Dioxide	0.5710	0.5850	1.1272	
Methane	70.6744	72.4044	50.8552	
Ethane	12.9937	13.3118	17.5248	3.555
Propane	7.3509	7.5308	14.5390	2.072
Iso-Butane	0.8677	0.8889	2.2620	0.290
n-Butane	2.1166	2.1684	5.5180	0.683
Iso-Pentane	0.4679	0.4794	1.5143	0.175
n-Pentane	0.5187	0.5314	1.6786	0.192
Hexanes	0.3367	0.3449	1.3013	0.142
Heptanes	0.2976	0.3049	1.3376	0.140
Octanes	0.1258	0.1289	0.6447	0.066
Nonanes Plus	0.0170	0.0175	0.0983	0.010
	97.6105	100.0000	100.0000	7.325

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.84	128.26
Compressibility Factor	0.9957	
Relative Density Real Gas	0.7917	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1340.5	6974.4
Water Sat. Gas Base BTU	1317.6	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1334.7	6974.4
Ideal, Gross HV - Wet	1311.4	6852.4

Comments: H2S Field Content 0 ppm
FMP/LSE NM40659

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:** Sand Dunes South Corridor CTB**Flare Date:** 09/11/2024**Duration of Event:** 24 Hours**MCF Flared:** 283**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Emergency Flare > Equipment Malfunctions**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, the facility continued to have extreme difficulty operating in its normal manner due to VRT and VRU equipment issues, which caused OXY to intermittently flare several times within a 24-Hour period. There was an LIT failure, which in turn, caused the bypass valve to the tanks to open. The VRU setpoint configuration does not allow for multiple range conversions between VRT (psi) and tanks (oz). In addition, the low pressure VRU unit #4 had a faulty VFD board and is awaiting repairs, which was scheduled for September 12, 2024. Oxy is unable to predict, avoid or prevent types of equipment malfunctions from occurring, as they happen suddenly and without warning. 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:

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, the facility continued to have extreme difficulty operating in its normal manner due to VRT and VRU equipment issues, which caused OXY to intermittently flare several times within a 24-Hour period. There was an LIT failure, which in turn, caused the bypass valve to the tanks to open. The VRU setpoint configuration does not allow for multiple range conversions between VRT (psi) and tanks (oz). In addition, the low pressure VRU unit #4 had a faulty VFD board and is awaiting repairs, which was scheduled for September 12, 2024. Oxy field personnel choked back wells to minimize emissions during this period. OXY made every effort to control and minimize emissions as much as possible during this event.

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, various forms of mechanical or technical equipment issues can be sudden, reasonably unforeseeable and unexpected which can cause 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 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 equipment preventative maintenance program for all its facilities and continually work with its field personnel to resolve those issues in a timely manner.

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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
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 386938

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 386938
	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 386938

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:
	16696
	Action Number:
	386938
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	[fAPP2127048458] Sand Dunes South Corridor 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	Yes
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	Emergency Flare > Equipment Malfunctions

Representative Compositional Analysis of Vented or Flared Natural Gas Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	72
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (C02) percentage, if greater than one percent	1
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 386938

QUESTIONS (continued)

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	Action Number: 386938
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	09/11/2024
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	24

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: 283 Mcf Recovered: 0 Mcf Lost: 283 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	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, the facility continued to have extreme difficulty operating in its normal manner due to VRT and VRU equipment issues, which caused OXY to intermittently flare several times within a 24-Hour period. There was an LIT failure, which in turn, caused the bypass valve to the tanks to open. The VRU setpoint configuration does not allow for multiple range conversions between VRT (psi) and tanks (oz). In addition, the low pressure VRU unit #4 had a faulty VFD board and is awaiting repairs, which was scheduled for September 12, 2024. Oxy is unable to predict, avoid or prevent types of equipment malfunctions from occurring, as they happen suddenly and without warning. This malfunctioning event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.
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Steps taken to limit the duration and magnitude of vent or flare	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, the facility continued to have extreme difficulty operating in its normal manner due to VRT and VRU equipment issues, which caused OXY to intermittently flare several times within a 24-Hour period. There was an LIT failure, which in turn, caused the bypass valve to the tanks to open. The VRU setpoint configuration does not allow for multiple range conversions between VRT (psi) and tanks (oz). In addition, the low pressure VRU unit #4 had a faulty VFD board and is awaiting repairs, which was scheduled for September 12, 2024. Oxy field personnel choked back wells to minimize emissions during this period. OXY made every effort to control and minimize emissions as much as possible during this event.
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ACKNOWLEDGMENTS

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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

Action 386938

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	Action Number: 386938
	Action Type: [C-129] Venting and/or Flaring (C-129)

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.	9/25/2024