


**AKM MEASUREMENT SERVICES,LLC. Natural Gas Analysis Report**  
 GPA 2172-09/API 14.5 Report with GPA 2145-16 Physical Properties

	Sample Information
Sample Name	LOST TANK 18 FACILITY HP VRU 3
Technician	ANTHONY DOMINGUEZ
Analyzer Make & Model	INFICON MICRO GC
Last Calibration/Validation Date	12-15-2023
Meter Number	16427V
Air temperature	57
Flow Rate (MCF/Day)	492
Heat Tracing	HEATED HOSE & GASIFIER
Sample description/mtr name	LOST TANK 18 FACILITY HP VRU 3
Sampling Method	FILL & EMPTY
Operator	OCCIDENTAL PETROLEUM, OXY USA INC
State	NEW MEXICO
Region Name	PERMIAN_RESOURCES
Asset	NEW MEXICO
System	LOST TANK
FLOC	OP-DELNE-BT010
Sample Sub Type	CTB
Sample Name Type	METER
Vendor	AKM MEASUREMENT
Cylinder #	38947
Sampled by	SCOTT
Sample date	12-12-2023
Analyzed date	12-19-2023
Method Name	C9
Injection Date	2023-12-19 16:54:11
Report Date	2023-12-19 16:55:47
EZReporter Configuration File	1-16-2023 OXY GPA C9+ H2S #2.cfgx
Source Data File	53d6f6b5-4467-4841-89c9-4fae48334cc6
NGA Phys. Property Data Source	GPA Standard 2145-16 (FPS)
Data Source	INFICON Fusion Connector

**Component Results**

Component Name	Peak Area	Raw Amount	Response Factor	Norm Mole%	Gross HV (Dry) (BTU / Ideal cu.ft.)	Relative Gas Density (Dry)	GPM (Dry) (Gal. / 1000 cu.ft.)	
Nitrogen	4568.9	0.2600	0.00005691	0.2564	0.0	0.00248	0.028	
Methane	456273.6	33.2457	0.00007286	32.7797	331.8	0.18157	5.613	
CO2	30720.0	1.4627	0.00004761	1.4422	0.0	0.02191	0.249	
Ethane	576932.1	26.5931	0.00004609	26.2203	465.1	0.27222	7.082	
H2S	0.0	0.0000	0.00000000	0.0000	0.0	0.00000	0.000	
Propane	760744.0	24.9277	0.00003277	24.5783	619.8	0.37420	6.839	
iso-butane	300846.6	3.3273	0.00001106	3.2807	106.9	0.06584	1.084	
n-Butane	758257.0	8.3375	0.00001100	8.2207	268.8	0.16497	2.618	
iso-pentane	132666.7	1.2963	0.00000977	1.2781	51.3	0.03184	0.472	
n-Pentane	135071.5	1.2676	0.00000938	1.2499	50.2	0.03114	0.458	
hexanes	50692.0	0.4997	0.00000986	0.4927	23.5	0.01466	0.205	
heptanes	27428.0	0.1657	0.00000604	0.1633	9.0	0.00565	0.076	
octanes	6748.0	0.0362	0.00000537	0.0357	2.2	0.00141	0.018	
nonanes+	614.0	0.0020	0.00000326	0.0020	0.1	0.00009	0.001	
Total:		101.4216		100.0000	1928.9	1.16798	24.743	

**Results Summary**

Result	Dry	Sat.	
Total Un-Normalized Mole%	101.4216		
Pressure Base (psia)	14.730		
Temperature Base (Deg. F)	60.00		
Flow to Impingement (scfh)	114.3		

Result	Dry	Sat.	
Flowing Pressure (psia)	102.1		
Gross Heating Value (BTU / Ideal cu.ft.)	1928.9	1895.3	
Gross Heating Value (BTU / Real cu.ft.)	1948.6	1915.7	
Relative Density (G), Real	1.1794	1.1705	

Monitored Parameter Report

Parameter	Value	Lower Limit	Upper Limit	Status	
Total un-normalized amount	101.4216	97.0000	103.0000	Pass	

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Lost Tank 18 CPF**Flare Date:** 07/26/2024**Duration of Event:** 8 Minutes**MCF Flared:** 55**Start Time:** 04:12 PM**End Time:** 04:20 PM**Cause:** Emergency Flare > Downstream Activity > Lucid > Plant Power Outage > Lucid ESD Valve Shut**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 downstream pipeline operator, which impacted Oxy's ability to send gas to a third-party downstream gas pipeline. This interruption, restriction, or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to 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, this flaring event occurred due to an unexpected shut in and/or restriction of flow intake by Lucid, which was caused by their gas plant having a power outage. This offload to Lucid is new. 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 Lucid Personnel.

**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, this flaring event occurred due to an unexpected shut in and/or restriction of flow intake by Lucid, which was caused by their gas plant having a power outage. This offload to Lucid is new. 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 Lucid Personnel. Steps were immediately taken by the OXY Operator to reduce and mitigate the volume of gas being sent to flare by reducing production choking all associated high GOR wells.

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

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of a Lucid gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening or reoccurring. Lucid's gas plant and associated facilities will 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. 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 keep continually communicate with Lucid personnel during these types of situations.

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

DEFINITIONS

Action 373091

DEFINITIONS

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:  16696
	Action Number:  373091
	Action Type:  [C-129] Venting and/or Flaring (C-129)

DEFINITIONS

<p>For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:</p> <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 373091

QUESTIONS

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	Action Number: 373091
	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	[fAPP2226965761] Lost Tank 18 CPF

<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 > Downstream Activity > Lucid > Plant Power Outage > Lucid ESD Valve Shut

<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	33
Nitrogen (N2) percentage, if greater than one percent	0
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) 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 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

Action 373091

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	07/26/2024
Time vent or flare was discovered or commenced	04:12 PM
Time vent or flare was terminated	04:20 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: 55 Mcf   Recovered: 0 Mcf   Lost: 55 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	[371960] LUCID ENERGY DELAWARE, 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 downstream pipeline operator, which impacted Oxy's ability to send gas to a third-party downstream gas pipeline. This interruption, restriction, or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to 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, this flaring event occurred due to an unexpected shut in and/or restriction of flow intake by Lucid, which was caused by their gas plant having a power outage. This offload to Lucid is new. 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 Lucid Personnel.
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Steps taken to limit the duration and magnitude of vent or flare	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, this flaring event occurred due to an unexpected shut in and/or restriction of flow intake by Lucid, which was caused by their gas plant having a power outage. This offload to Lucid is new. 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 Lucid Personnel. Steps were immediately taken by the OXY Operator to reduce and mitigate the volume of gas being sent to flare by reducing production choking all associated high GOR wells.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of a Lucid gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening or reoccurring. Lucid's gas plant and associated facilities will 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. 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 keep continually communicate with Lucid personnel during these types of situations.

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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

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	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.	8/12/2024