

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Lakewood 14-2 Battery**Vent Date:** 01/04/2025**Duration of Event:** 24 Hours**MCF Vented:** 57.6**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Venting > Facility Backpressure Valve > Valve Adjustment Flaw**Method of Vented Gas Measurement:** Allocation

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. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. OPS personnel determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on January 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This 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 all stranded gas to a flare rather than vent 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 venting or flaring. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. 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:

In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Lakewood 14-2 Battery**Vent Date:** 01/04/2025**Duration of Event:** 24 Hours**MCF Vented:** 57.6**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Venting > Facility Backpressure Valve > Valve Adjustment Flaw**Method of Vented Gas Measurement:** Allocation

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. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. OPS personnel determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on January 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This 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 all stranded gas to a flare rather than vent 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 venting or flaring. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. 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:

In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.

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 423749

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 423749
	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">• 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.

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

QUESTIONS

Action 423749

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 423749
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Prerequisites <i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident Well	Unavailable.
Incident Facility	[fAPP2126853680] LAKEWOOD14-2 BATTERY

Determination of Reporting Requirements <i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
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.
<i>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.</i>	
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	Venting > Facility Backpressure Valve > Valve Adjustment Flaw

Representative Compositional Analysis of Vented or Flared Natural Gas <i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	69
Nitrogen (N2) percentage, if greater than one percent	3
Hydrogen Sulfide (H2S) PPM, rounded up	5,000
Carbon Dioxide (CO2) percentage, if greater than one percent	2
Oxygen (O2) percentage, if greater than one percent	0
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
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.

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

QUESTIONS, Page 2

Action 423749

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 423749
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	01/04/2025
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	Cause: Other Other (Specify) Natural Gas Vented Released: 58 Mcf Recovered: 0 Mcf Lost: 58 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Allocation
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	<p>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. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. OPS personnel determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on January 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.</p> <p>It is OXY's policy to route all stranded gas to a flare rather than vent during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or</p>

Steps taken to limit the duration and magnitude of vent or flare	foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of venting or flaring. In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. 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	In this case, this sudden and unexpected vent release was caught during a flyover which ranged from December 29, 2024, to January 05, 2025. The results of that flyover were submitted to Oxy personnel for review on January 14, 2025. An Oxy emissions technician physically verified the vent leak on January 14th, 2025, and confirmed the venting was no longer occurring. It was determined that the initial venting leak, captured in the flyover, was due to the facility backpressure valve was set lower than the sales line pressure, which in turn, caused the gas to be sent to the tanks rather than to the sales line. This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. Prior to this venting leak being captured during the flyover and Oxy notified of its existence, the venting leak was identified on the 6th by a production tech and the facility backpressure valve was set above the max sales line pressure to prevent any potential future venting. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.

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

ACKNOWLEDGMENTS

Action 423749

ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 423749
	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 complete 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.

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

CONDITIONS

Action 423749

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 423749
	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.	1/22/2025