

# Certificate of Analysis

Number: 6030-21030220-003A

Artesia Laboratory 200 E Main St. Artesia, NM 88210 Phone 575-746-3481

Chandler Montgomery Occidental Petroleum 1502 W Commerce Dr. Carlsbad, NM 88220 Mar. 19, 2021

Field: Pure Gold Sampled By: Michael Mirabal Station Name: Platinum MDP1 34-3 FC 171H LG Sample Of: Gas Spot Station Number: 17471I Sample Date: 03/17/2021 10:17

Station Number: 17471I Sample On: 03/17/2021 10:17
Station Location: OXY Sample Conditions: 1247 psia, @ 94 °F Ambient: 50 °F

Sample Point:DownstreamEffective Date:03/17/2021 10:17Formation:QuarterlyMethod:GPA-2261MCounty:EddyCylinder No:5030-00470

Type of Sample: : Spot-Cylinder Instrument: 70104124 (Inficon GC-MicroFusion)

Heat Trace Used: N/A Last Inst. Cal.: 03/15/2021 0:00 AM

Sampling Method: Fill and Purge Analyzed: 03/19/2021 08:40:51 by EJR

Sampling Company: : SPL

## **Analytical Data**

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.531
Nitrogen	2.498	2.483	3.067		GPM TOTAL C3+	2.691
Methane	72.581	72.130	51.021		GPM TOTAL iC5+	0.429
Carbon Dioxide	5.813	5.777	11.210			
Ethane	10.707	10.641	14.108	2.840		
Propane	5.581	5.546	10.783	1.525		
Iso-butane	0.691	0.687	1.761	0.224		
n-Butane	1.641	1.631	4.180	0.513		
Iso-pentane	0.363	0.361	1.148	0.132		
n-Pentane	0.364	0.362	1.152	0.131		
Hexanes Plus	0.384	0.382	1.570	0.166		
	100.623	100.000	100.000	5.531		
Calculated Physical Properties		To	otal	C6+		
Relative Density Rea	· · · · · · · · · · · · · · · · · · ·	0.78	357	3.2176		
Calculated Molecular		22	.68	93.19		
Compressibility Factor		0.99	963			
<b>GPA 2172 Calculati</b>	on:					
<b>Calculated Gross B</b>	TU per ft <sup>3</sup> @ 14.65 p	sia & 60°F				
Real Gas Dry BTU		1.	181	5113		
Water Sat. Gas Base	e BTU	1.	161	5024		
Ideal, Gross HV - Dry	y at 14.65 psia	117	6.8	5113.2		
Ideal, Gross HV - We		115	6.2	5023.7		
Net BTU Dry Gas - re	eal gas	10	072			
Net BTU Wet Gas - real gas		10	054			
Comments: H2S F	ield Content 0 ppm					

Comments: H2S Field Content 0 ppm

Mcf/day 1594

CalyHatra

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality

assurance, unless otherwise stated.

## **EVENT SPECIFIC JUSTIFICATIONS FORM**

**Facility:** Platinum

**Start Date:** 06/25/2021 **End Date:** 06/25/2021

Cause: Downstream Activity Issue > Third Party Malfunction

**Duration of event:** 5.9 hours **MCF Volume Flared:** 58

Method of Flared Gas Measurement: Flare Meter

## 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 operator, which impacted Oxy's ability to send gas to a third-party 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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements.

In this case, this sudden and unexpected flaring event occurred due to third party pipeline operator, Enterprise, whose compressor station was having downstream facility issues that caused a spike in line pressure to the third-party gas gathering system, impacting Oxy's ability to send sales gas into the system from Oxy's facility. During this sudden and unexpected flaring event, OXY personnel continually monitored the Enterprise line pressure in and once the line pressure was stabilized, Oxy was able to resume gas sales to the third-party gas gathering system.

### 2. Steps Taken to limit duration and magnitude of venting or flaring:

Until Enterprise's facility equipment was able to handle the volume of gas sent to them, the spike in line pressure forced Oxy's upstream facility to route stranded gas to a flare. During this sudden and unexpected flaring event, OXY personnel continually monitored the third party sales line pressure in order to make necessary adjustments to its own equipment, when warranted, until Enterprise line pressure was back to normal.

## Corrective Actions taken to eliminate the cause and reoccurrence of venting or flaring:

During this sudden and unexpected flaring event, OXY personnel continually monitored the Enterprise line pressure in order to make necessary adjustments to its own compression equipment, when

warranted, until Enterprise's line pressure was back to normal. In addition, an effort was made to reduce the volume of gas to be flared by choking back wells with pressure control valves on the flowlines. Since this event was caused by a third-party high sales gas line pressure, Oxy is unable to eliminate the root cause of the issue. However, Oxy always takes steps to minimize the volume of gas flared by chocking back well production and maintaining contact with third party line operator to ensure that gas is safely directed back to sales as soon as the third-party line pressure returns to normal.

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

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**

QUESTIONS

Action 43135

### **QUESTIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	43135
	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	[30-015-45230] PLATINUM MDP1 34 3 FEDERAL COM #171H	
Incident Facility	Not answered.	

Determination of Reporting Requirements			
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional guidance.			
Was or is this venting and/or flaring caused by an emergency or malfunction	Yes		
Did or will this venting and/or flaring last eight hours or more cumulatively within any 24-hour period from a single event	No		
Is this considered a submission for a notification of a major venting and/or flaring	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 or will there be <b>at least 50 MCF</b> of natural gas vented and/or flared during this event	Yes		
Did this venting and/or flaring result in the release of <b>ANY</b> 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 venting and/or flaring 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 due to third party malfunction.

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	2	
Hydrogen Sulfide (H2S) PPM, rounded up	0	
Carbon Dioxide (C02) percentage, if greater than one percent	6	
Oxygen (02) 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 (02) percentage quality requirement	Not answered.	

Date(s) and Time(s)		
Date venting and/or flaring was discovered or commenced	06/25/2021	
Time venting and/or flaring was discovered or commenced	12:00 AM	
Time venting and/or flaring was terminated	05:55 AM	
Cumulative hours during this event	6	

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: 58 Mcf   Recovered: 0 Mcf   Lost: 58 Mcf ]
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
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 or is this venting and/or flaring a result of downstream activity	Not answered.	
Date notified of downstream activity requiring this venting and/or flaring	Not answered.	
Time notified of downstream activity requiring this venting and/or flaring	Not answered.	

Steps and Actions to Prevent Waste		
For this event, the operator could not have reasonably anticipated the current event and it was beyond the operator's control.	True	
Please explain reason for why this event was beyond your 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 operator, which impacted Oxy's ability to send gas to a third-party 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. It is Oxy's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. In this case, this sudden and unexpected flaring event occurred due to third party pipeline operator, Enterprise, whose compressor station was having downstream facility issues that caused a spike in line pressure to the third-party gas gathering system, impacting Oxy's ability to send sales gas into the system from Oxy's facility. During this sudden and unexpected flaring event, OXY personnel continually monitored the Enterprise line pressure in and once the line pressure was stabilized, Oxy was able to resume gas sales to the third-party gas gathering system.	
Steps taken to limit the duration and magnitude of venting and/or flaring	Until Enterprise's facility equipment was able to handle the volume of gas sent to them, the spike in line pressure forced Oxy's upstream facility to route stranded gas to a flare. During this sudden and unexpected flaring event, OXY personnel continually monitored the third party sales line pressure in order to make necessary adjustments to its own equipment, when warranted, until Enterprise line pressure was back to normal.	
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	During this sudden and unexpected flaring event, OXY personnel continually monitored the Enterprise line pressure in order to make necessary adjustments to its own compression equipment, when warranted, until Enterprise's line pressure was back to normal. In addition, an effort was made to reduce the volume of gas to be flared by choking back wells with pressure control valves on the flowlines. Since this event was caused by a third-party high sales gas line pressure, Oxy is unable to eliminate the root cause of the issue. However, Oxy always takes steps to minimize the volume of gas flared by chocking back well production and maintaining contact with third party line operator to ensure that gas is safely directed back to sales as soon as the third-party line pressure returns to normal.	

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CONDITIONS

Action 43135

## **CONDITIONS**

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P.O. Box 4294	Action Number:
Houston, TX 772104294	43135
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

#### CONDITIONS

Created By	Condition	Condition Date
shelbyschoe	of 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.	8/18/2021