



Certificate of Analysis

Number: 6030-21050216-004A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

May 25, 2021

Field: Turkey
Station Name: Turkey Track CTB Check B
Station Number: 14670B
Station Location: CTB
Sample Point: Meter
Formation: Spot
County: Eddy
Type of Sample: : Spot-Cylinder
Heat Trace Used: N/A
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Michael Mirabal
Sample Of: Gas Spot
Sample Date: 05/20/2021 10:47
Sample Conditions: 79 psia, @ 82 °F Ambient: 75 °F
Effective Date: 05/20/2021 10:47
Method: GPA-2261M
Cylinder No: 5030-00537
Instrument: 6030_GC6 (Inficon GC-3000 Micro)
Last Inst. Cal.: 05/03/2021 0:00 AM
Analyzed: 05/25/2021 07:28:39 by KNF

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.984
Nitrogen	2.015	2.042	2.652		GPM TOTAL C3+	2.878
Methane	75.693	76.715	57.062		GPM TOTAL iC5+	0.649
Carbon Dioxide	0.232	0.235	0.480			
Ethane	11.483	11.638	16.226	3.106		
Propane	5.288	5.359	10.957	1.473		
Iso-butane	0.679	0.688	1.854	0.225		
n-Butane	1.667	1.689	4.552	0.531		
Iso-pentane	0.421	0.427	1.428	0.156		
n-Pentane	0.431	0.437	1.462	0.158		
Hexanes Plus	0.760	0.770	3.327	0.335		
	98.669	100.000	100.000	5.984		

Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7472	3.2176
Calculated Molecular Weight	21.57	93.19
Compressibility Factor	0.9963	

GPA 2172 Calculation:

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

Real Gas Dry BTU	1268	5113
Water Sat. Gas Base BTU	1246	5024
Ideal, Gross HV - Dry at 14.65 psia	1263.2	5113.2
Ideal, Gross HV - Wet	1241.1	5023.7
Net BTU Dry Gas - real gas	1151	
Net BTU Wet Gas - real gas	1131	

Comments: H2S Field Content 0 ppm
Mcf/day 19263

Report generated by:

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

UPSET EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Turkey Track CTB**Date:** 08/19/2021**Duration of event:** 2 Hours 11 Minutes**MCF Flared:** 88**Intermittent Start and End Times:** 6:29 AM - 6:44 AM, 10:44 AM - 10:59 AM; 12:34 PM - 12:44 PM; 12:59 PM - 1:14 PM; 2:17 PM-2:32 PM, 4:35 PM-4:48 PM; 5:15 PM - 5:26 PM; 5:47 PM - 6:02 PM; 8:08 PM - 8:16 PM, 8:52 PM - 9:02 PM, 11:45 PM - 11:49 PM**Cause:** Sudden and Unexpected Well Surges**Method of Flared Gas Measurement:** Gas Flare Meter**Well API Associated with Facility:** 30-015-44143 Turkey Track 8 7 State 023 H**Comments:** These intermittent occurrences of flaring are unforeseeable and unanticipated as wells surge from time to time, which is out of OXY's control to avoid or prevent from happening yet OXY made every effort to control and minimize emissions as much as possible.

1. Reason why this event was beyond Operator's control:

Sales gas had to be flared rather than be compressed due to several wells flowing to the facility began surging more gas than the compressors engines could handle several times throughout the day. Turkey Track wells 8-7-23 & 24 flowing into the facility began surging more gas than the compressor engines could handle, which led OXY to route the overflow of sales gas to a flare in order to minimize emissions as much as possible. These intermittent occurrences of flaring are unforeseeable and unanticipated as wells surge from time to time, which are out of OXY's control to avoid or prevent from happening, yet OXY made every effort to control and minimize emissions as much as possible. OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to minimize emissions as much as possible. The flare is regularly monitored per the facility's General Construction Permit (GCP) requirements to ensure flame is lit and meeting opacity requirements.

Intermittent flaring: 6:29 AM - 6:44 AM, 10:44 AM - 10:59 AM; 12:34 PM - 12:44 PM; 12:59 PM - 1:14 PM; 2:17 PM-2:32 PM, 4:35 PM-4:48 PM; 5:15 PM - 5:26 PM; 5:47 PM - 6:02 PM; 8:08 PM - 8:16 PM, 8:52 PM - 9:02 PM, 11:45 PM - 11:49 PM.

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

The steps take to limit the duration of these flaring incidents was as soon as the wells began surging that morning, Oxy production techs to begin taking the immediate steps to start sales gas compressor unit # 2, and to allow the compressor to maximize to its optimization. In an effort to reduce flaring, Oxy production techs continuously monitored the well program which indicates when wells are beginning to surge and additional production techs would slowly start choking back several wells with the pressure control valves on the flowlines until each of the flaring incidents were minimized and stopped. OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to minimize emissions as much as possible.

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

This flaring event was unforeseeable and unanticipated as wells surge from time to time, which is out of OXY's control to avoid or prevent from happening. OXY made every effort to control and minimize emissions as much as possible. Constant communication and adjustments by and between OXY production techs to the compression equipment are not immediate, as it takes time for the compressors to speed up, just like any engines on a vehicle, they don't go from 0 to 100 mph immediately. Adjustments were already being made and as the compression sped up to handle the well surges and/or wells were adjusted to cut back so that each instance of intermittent flaring was minimal.

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

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Phone:(575) 748-1283 Fax:(575) 748-9720

District III

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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

QUESTIONS

Action 46463

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 46463
	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	[30-015-44143] TURKEY TRACK 8 7 STATE #023H
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 additional 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 at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this venting and/or flaring 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 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 > Sudden and Unexpected Well Surges

Representative Compositional Analysis of Vented or Flared Natural Gas

Please provide the mole percent for the percentage questions in this group.

Methane (CH4) percentage	77
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	0
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.

Date(s) and Time(s)

Date venting and/or flaring was discovered or commenced	08/19/2021
Time venting and/or flaring was discovered or commenced	06:29 AM
Time venting and/or flaring was terminated	08:40 AM
Cumulative hours during this event	2

Measured or Estimated Volume of Vented or Flared Natural Gas

Natural Gas Vented (Mcf) Details	Not answered.
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Natural Gas Flared (Mcf) Details	Cause: Other Other (Specify) Natural Gas Flared Released: 88 Mcf Recovered: 0 Mcf Lost: 88 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 or is this venting and/or flaring a result of downstream activity	No
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	See Justification Form > Sales gas had to be flared rather than be compressed due to several wells flowing to the facility began surging more gas than the compressors engines could handle several times throughout the day. Turkey Track wells 8-7-23 & 24 flowing into the facility began surging more gas than the compressor engines could handle, which led OXY to route the overflow of sales gas to a flare in order to minimize emissions as much as possible. These intermittent occurrences of flaring are unforeseeable and unanticipated as wells surge from time to time, which are out of OXY's control to avoid or prevent from happening, yet OXY made every effort to control and minimize emissions as much as possible.
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > The steps take to limit the duration of these flaring incidents was as soon as the wells began surging that morning, Oxy production techs to begin taking the immediate steps to start sales gas compressor unit # 2, and to allow the compressor to maximize to its optimization. In an effort to reduce flaring, Oxy production techs continuously monitored the well program which indicates when wells are beginning to surge and additional production techs would slowly start choking back several wells with the pressure control valves on the flowlines until each of the flaring incidents were minimized and stopped. OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to minimize emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > This flaring event was unforeseeable and unanticipated as wells surge from time to time, which is out of OXY's control to avoid or prevent from happening. OXY made every effort to control and minimize emissions as much as possible. Constant communication and adjustments by and between OXY production techs to the compression equipment are not immediate, as it takes time for the compressors to speed up, just like any engines on a vehicle, they don't go from 0 to 100 mph immediately. Adjustments were already being made and as the compression sped up to handle the well surges and/or wells were adjusted to cut back so that each instance of intermittent flaring was minimal.

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CONDITIONS

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	Action Number: 46463
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
marialuna	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.	9/3/2021