Volumetrics US Inc.
3001 N Cameron St, Victoria, TX-77901
Phone: 361-827-4024

Company:	OXY USA INC	**Job ID:**	
Field/Location :	LEA	**Sampled by:**	VOLUMETRICS/JA
Station Name :	COVINGTON A FEDERAL 9 PROD (FMP?)	**Sample Type :**	SPOT-CYLINDER
Station Number :	83213P	**Sample Temperature (F):**	95
Sample Date:	10/20/20 11:18 AM	**Sample Pressure (PSIG):**	46
Analysis Date:	10/30/20 12:22 PM	**Flow rate (MCF/Day):**	33
Instrument:	VARIAN- CP 4900 GC	**Ambient Temperature (F):**	68
Calibration/Verification Date:	10/30/2020	**Sampling method:**	FILL & EMPTY
Heat Trace used:	YES	**Cylinder Number:**	1166

NATURAL GAS EXTENDED ANALYSIS: GPA 2286

Components	Un-Normalized Mol%	Normalized Mol%	GPM 14.650	GPM 14.730	GPM 15.025
Hydrogen Sulfide	0.0003	0.0003			
Nitrogen	8.6062	8.7769			
Methane	58.1847	59.3387			
Carbon Dioxide	0.0529	0.0539			
Ethane	12.7530	13.0060	3.476	3.495	3.565
Propane	10.5337	10.7426	2.958	2.974	3.034
Isobutane	1.8472	1.8838	0.616	0.619	0.632
N-butane	3.1458	3.2082	1.011	1.016	1.037
Isopentane	0.9224	0.9407	0.344	0.346	0.353
N-Pentane	0.6971	0.7109	0.258	0.259	0.264
Hexanes(C6's)	0.5193	0.5297	0.218	0.219	0.223
Heptanes (C7's)	0.5656	0.5769	0.226	0.228	0.232
Octanes (C8's)	0.1873	0.1910	0.088	0.088	0.090
Nonanes Plus (C9+)	0.0396	0.0404	0.022	0.022	0.022
Total	**98.0551**	**100.0000**			

Physical Properties (Calculated)	**14.650 psia**	**14.730 psia**	**15.025 psia**
Total GPM Ethane+	9.216	9.265	9.452
Total GPM Iso-Pentane+	1.155	1.161	1.184
Compressibility (Z)	0.9949	0.9949	0.9948
Specific Gravity (Air=1) @ 60 °F	0.9034	0.9034	0.9035
Molecular Weight	26.034	26.034	26.034

Gross Heating Value	**14.650 psia**	**14.730 psia**	**15.025 psia**
Dry, Real (BTU/Ft^3)	1401.7	1409.4	1437.8
Wet, Real (BTU/Ft^3)	1377.2	1384.7	1412.6
Dry, Ideal (BTU/Ft^3)	1394.6	1402.2	1430.3
Wet, Ideal (BTU/Ft^3)	1370.2	1377.7	1405.2

Temperature base 60 °F

Comment: H2S = 2.5 PPM

Verified by

Mostaq Ahammad
Petroleum Chemist

Approved by

Deann Friend
Laboratory Manager

UPSET EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Covington CPD Battery **Date:** 08/21/2021

Duration of event: 10 Hours 45 Minutes **MCF Flared:** 192.2

Start Time: 12:00 AM **End Time:** 10:45 AM

Cause: Downstream Activity > DCP > Scheduled Supersystem Maintenance

Method of Flared Gas Measurement: Gas Flare Meter

Well API Associated with Facility: 30-025-32036 Covington A Federal #009

Comments: This upset event was not caused by any wells associated with the facility. This emissions event was caused by a third-party pipeline operator's downstream activity, which is beyond the owner/operator's control.

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

This emissions event was caused by a third-party pipeline operator's downstream facility maintenance activity, which is beyond Oxy's control to prevent or control from happening. This complete shut-in of the gas pipeline by third-party pipeline operator, DCP, is downstream of Oxy's custody transfer point. Oxy was notified in advance on or around August 10, 2021, by DCP personnel, by written correspondence, that an immediate required maintenance of their supersystem was scheduled to be performed on or around an estimated date of August 18, 2021, which would affect DCP's ability to process volumes within their supersystem, which in turn affects Oxy's upstream facility and its ability to send its gas to DCP. During DCP's supersystem immediate maintenance period, estimated to last only 48 hours, DCP would be unable to take gas from its operators.

This event is part of a five (5) day flaring occurrence due to DCP's supersystem maintenance period occurring from August 17, 2021 to August 21, 2021. DCP began their supersystem maintenance procedures a day earlier than previously notified, occurring on August 17, 2021 as DCP needed to depressurize their system and requested that Oxy shut in production/wells. DCP's pipeline, due to their depressurization needs, subsequently shut in the gas pipeline to Oxy, which affected Oxy's upstream facility operations. DCP did not call for gas or open the pipeline to take gas from Oxy until August 21, 2021. DCP's supersystem maintenance activity lasted more than the initial 48 hours they indicated to Oxy. Oxy flared continuously during DCP's complete and total shut-in of their pipeline to Oxy while they conducted downstream maintenance activities.

The Covington CPD battery flare is a gas gathering flare system for multiple tank batteries across Oxy's defined Red Tank area. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operational safety and start up procedures to allow some production to occur at this facility, as it was necessary to maintain a minimal amount of gas flow to restart the facility's compression equipment, specifically the gas lift compressors, across the Red Tank area, when DCP was ready and able to start taking gas. The minimal amount of gas flow allowed to be produced and flare was done out of necessity to protect personnel and equipment as a safeguard against potential issues that could occur when restarting production across the Red Tank area.

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

This emissions event was caused by a third-party pipeline operator's downstream facility maintenance activity, which is beyond Oxy's control to prevent or control from happening. This complete shut-in of the gas pipeline by third-party pipeline operator, DCP, is downstream of Oxy's custody transfer point. Oxy was notified in advance on or around August 10, 2021, by DCP personnel, by written correspondence, that an immediate required maintenance was scheduled to be performed on or around an estimated date of August 18, 2021, which would affect DCP's ability to process volumes within their supersystem, which in turn affects Oxy's upstream facility and its ability to send its gas to DCP. During DCP's supersystem immediate maintenance period, estimated to last only 48 hours, DCP would be unable to take gas from its operators. DCP's supersystem maintenance activity lasted more than the initial 48 hours they indicated to Oxy.

The steps taken to limit duration and magnitude of flaring during DCP's supersystem maintenance period occurring from August 17, 2021 to August 21, 2021 was to shut in as much of production/wells as much as possible. The Covington CPD battery flare is a gas gathering flare system for multiple tank batteries across Oxy's Red Tank area. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operation practices to allow some production to occur, as it was necessary to maintain a minimal amount of gas flow to restart the facility's compression equipment, specifically the gas lift compressors, across the Red Tank area, when DCP was ready and able to start taking gas. The minimal amount of gas flow allowed to be produced and flare was done out necessity to protect personnel and equipment as a safeguard against potential issues that could occur when restarting production across the Red Tank area. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible.

In addition, Oxy production techs and essential personnel maintained constant communication with DCP personnel, during this flaring period, to prepare for the re-opening of DCP's pipeline and their gas services to recommence. During this time, Oxy production techs also continually monitored the flare during this flaring period.

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

Oxy is unable to take any corrective actions to eliminate this cause and potential reoccurrence of this circumstance of flaring as this emissions event was caused by a third-party pipeline operator's downstream facility maintenance activity, which is beyond Oxy's control to avoid, prevent or control from happening. This complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point. While this event was out of Oxy's control to avoid or prevent from happening, Oxy made every effort to minimize emissions while DCP was having downstream maintenance activity issues.

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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 46489

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 46489
	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	**[30-025-32036] COVINGTON A FEDERAL #009**
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	No
Did or will this venting and/or flaring last eight hours or more cumulatively within any 24-hour period from a single event	Yes
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 > Downstream Activity > DCP > Scheduled Supersystem Maintenance

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	59
Nitrogen (N2) percentage, if greater than one percent	9
Hydrogen Sulfide (H2S) PPM, rounded up	2
Carbon Dioxide (C02) percentage, if greater than one percent	0
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	08/21/2021
Time venting and/or flaring was discovered or commenced	12:00 AM
Time venting and/or flaring was terminated	10:30 AM
Cumulative hours during this event	10

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: 192 Mcf | Recovered: 0 Mcf | Lost: 192 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	Yes
Date notified of downstream activity requiring this venting and/or flaring	08/10/2021
Time notified of downstream activity requiring this venting and/or flaring	07:38 PM

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 > This emissions event was caused by a third-party pipeline operator's downstream facility maintenance activity, which is beyond Oxy's control to prevent or control from happening. This complete shut-in of the gas pipeline by third-party pipeline operator, DCP, is downstream of Oxy's custody transfer point. Oxy was notified in advance on or around August 10, 2021, by DCP personnel, by written correspondence, that an immediate required maintenance of their supersystem was scheduled to be performed on or around an estimated date of August 18, 2021, which would affect DCP's ability to process volumes within their supersystem, which in turn affects Oxy's upstream facility and its ability to send its gas to DCP. During DCP's supersystem immediate maintenance period, estimated to last only 48 hours, DCP would be unable to take gas from its operators.
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > The steps taken to limit duration and magnitude of flaring during DCP's supersystem maintenance period occurring from August 17, 2021 to August 21, 2021 was to shut in as much of production/wells as much as possible. The Covington CPD battery flare is a gas gathering flare system for multiple tank batteries across Oxy's Red Tank area. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operation practices to allow some production to occur, as it was necessary to maintain a minimal amount of gas flow to restart the facility's compression equipment, specifically the gas lift compressors, across the Red Tank area, when DCP was ready and able to start taking gas. The minimal amount of gas flow allowed to be produced and flare was done out necessity to protect personnel and equipment as a safeguard against potential issues that could occur when restarting production across the Red Tank area. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > Oxy is unable to take any corrective actions to eliminate this cause and potential reoccurrence of this circumstance of flaring as this emissions event was caused by a third-party pipeline operator's downstream facility maintenance activity, which is beyond Oxy's control to avoid, prevent or control from happening. This complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point. While this event was out of Oxy's control to avoid or prevent from happening, Oxy made every effort to minimize emissions while DCP was having downstream maintenance activity issues.

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CONDITIONS

Action 46489

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Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 46489
	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.	9/5/2021