



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 | Sampled By: | Michael Mirabal |
| Station Name: | Turkey Track CTB Check B | Sample Of: | Gas Spot |
| Station Number: | 14670B | Sample Date: | 05/20/2021 10:47 |
| Station Location: | CTB | Sample Conditions: | 79 psia, @ 82 °F Ambient: 75 °F |
| Sample Point: | Meter | Effective Date: | 05/20/2021 10:47 |
| Formation: | Spot | Method: | GPA-2261M |
| County: | Eddy | Cylinder No: | 5030-00537 |
| Type of Sample: | Spot-Cylinder | Instrument: | 6030_GC6 (Inficon GC-3000 Micro) |
| Heat Trace Used: | N/A | Last Inst. Cal.: | 05/03/2021 0:00 AM |
| Sampling Method: | Fill and Purge | Analyzed: | 05/25/2021 07:28:39 by KNF |
| 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+ | 5.984 |
| 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 | | |
| | <u>98.669</u> | <u>100.000</u> | <u>100.000</u> | <u>5.984</u> | | |

| | | |
|---------------------------------------|--------------|------------|
| Calculated Physical Properties | Total | C6+ |
| Relative Density Real Gas | 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 FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Turkey Track CTB

Flare Date: 11/18/2021

Duration of event: 1 Hour 25 Minutes

MCF Flared: 300

Start Time: 06:10 AM

End Time: 07:35 AM

Cause: Compressor Malfunction > Vibration

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This upset event was not caused by any wells associated with the facility. 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. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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

In this case, the facility's gas lift compressor unit # 1 went down due to a tripped cooler vibration switch. A vibration compressor malfunction can be caused by any number of things, such as fuel quality change, temperature changes, psi changes, oil issues, plugs and valves failing, etc., yet as it pertains to this event, there were no alarms on the compressor panel, to indicate why the cooler vibration switch tripped, which caused a malfunction to occur and automatically shut the compressor unit down. Vibration malfunctions are internal compressor unit malfunctions and notwithstanding proper gas lift compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable, and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. With the gas lift compressor down, there was no gas takeaway, and thus field psi increased until set psi levels were reached which triggered flaring, as a safety measure for operations, facility equipment, and personnel. USA gas lift compressor unit # 1 was working as designed and operated normally prior to the sudden and without warning malfunction of the compressor unit. This incident was completely out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working safely and diligently during this event.

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 gas compressor unit and/or multiple unit shutdown alarms, increased sensor 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, the facility's gas lift compressor unit # 1 went down due to a tripped cooler vibration switch. The production tech was on-site and immediately began to inspect the gas lift compressor. Finding no other cause for the vibration malfunction, the production tech was able to clear the malfunction alarm and restart the gas lift compressor, which shortly thereafter, once the gas compressor reached its optimized working operation and speed, did flaring cease. The production tech stayed on-site for a short period of time to monitor the gas lift compressor unit. No further incidents occurred. OXY made every effort to control and minimize emissions as much as possible during this event by working safely and diligently to resolve the issues.

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

Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of flaring as notwithstanding proper gas lift compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable, and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

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

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District III
1000 Rio Brazos Rd., Aztec, NM 87410
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 65135

QUESTIONS

| | |
|--|--|
| Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294 | OGRID: 192463 |
| | Action Number: 65135 |
| | 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 | Not answered. |
| Incident Facility | [fAPP2126265645] TURKEY TRACK CTB |

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| 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 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 venting and/or flaring 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 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 |

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| Equipment Involved | |
| Primary Equipment Involved | Not answered. |
| Additional details for Equipment Involved. Please specify | Emergency Flare > Compressor Malfunction > Vibration |

| | |
|--|---------------|
| 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 | 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 |
| <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. |

| | |
|---|------------|
| Date(s) and Time(s) | |
| Date venting and/or flaring was discovered or commenced | 11/18/2021 |
| Time venting and/or flaring was discovered or commenced | 06:10 AM |
| Time venting and/or flaring was terminated | 07:35 AM |
| Cumulative hours during this event | 2 |

| | |
|---|---------------|
| 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: 300 Mcf Recovered: 0 Mcf Lost: 300 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. |

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|--|---------------|
| Venting or Flaring Resulting from Downstream Activity | |
| Was or is this venting and/or flaring a result of downstream activity | No |
| Was notification of downstream activity received by you or your operator | Not answered. |
| Downstream OGRID that should have notified you or your operator | 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. |

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|--|--|
| 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 | In this case, the facility's gas lift compressor unit # 1 went down due to a tripped cooler vibration switch. A vibration compressor malfunction can be caused by any number of things, such as fuel quality change, temperature changes, psi changes, oil issues, plugs and valves failing, etc., yet as it pertains to this event, there were no alarms on the compressor panel, to indicate why the cooler vibration switch tripped, which caused a malfunction to occur and automatically shut the compressor unit down. Vibration malfunctions are internal compressor unit malfunctions and notwithstanding proper gas lift compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable, and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. With the gas lift compressor down, there was no gas takeaway, and thus field psi increased until set psi levels were reached which triggered flaring, as a safety measure for operations, facility equipment, and personnel. USA gas lift compressor unit # 1 was working as designed and operated normally prior to the sudden and without warning malfunction of the compressor unit. This incident was completely out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working safely and diligently during this event. |
| Steps taken to limit the duration and magnitude of venting and/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 gas compressor unit and/or multiple unit shutdown alarms, increased sensor 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, the facility's gas lift compressor unit # 1 went down due to a tripped cooler vibration switch. The production tech was on-site and immediately began to inspect the gas lift compressor. Finding no other cause for the vibration malfunction, the production tech was able to clear the malfunction alarm and restart the gas lift compressor, which shortly thereafter, once the gas compressor reached its optimized working operation and speed, did flaring cease. The production tech stayed on-site for a short period of time to monitor the gas lift compressor unit. No further incidents occurred. OXY made every effort to control and minimize emissions as much as possible during this event by working safely and diligently to resolve the issues. |
| Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring | Oxy is limited in the corrective actions to eliminate this type of cause and potential recurrence of flaring as notwithstanding proper gas lift compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable, and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit. |

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| | Action Number: 65135 |
| | Action Type: [C-129] Venting and/or Flaring (C-129) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|--|----------------|
| marialuna2 | 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. | 12/6/2021 |