



Certificate of Analysis

Number: 6030-21090237-002A

Artesia Laboratory

200 E Main St.
Artesia, NM 88210
Phone 575-746-3481Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Oct. 01, 2021

Field: Turkey
 Station Name: Turkey Track CTB Check A
 Station Number: 14670A
 Station Location: CTB
 Sample Point: Meter
 Formation: Monthly
 County: Eddy, NM
 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: 09/24/2021 01:28
 Sample Conditions: 72 psia, @ 89 °F Ambient: 85 °F
 Effective Date: 09/24/2021 01:28
 Method: GPA-2261M
 Cylinder No: 5030-04971
 Instrument: 6030_GC2 (Agilent GC-7890B)
 Last Inst. Cal.: 09/13/2021 15:05 PM
 Analyzed: 09/29/2021 11:37:10 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+	6.181
Nitrogen	2.077	2.055	2.631		GPM TOTAL C3+	3.073
Methane	77.029	76.211	55.875		GPM TOTAL iC5+	0.815
Carbon Dioxide	0.226	0.224	0.451			
Ethane	11.768	11.643	16.000	3.108		
Propane	5.465	5.407	10.896	1.487		
Iso-butane	0.729	0.721	1.915	0.236		
n-Butane	1.719	1.701	4.518	0.535		
Iso-pentane	0.497	0.492	1.622	0.180		
n-Pentane	0.517	0.512	1.688	0.185		
Hexanes Plus	1.045	1.034	4.404	0.450		
	101.072	100.000	100.000	6.181		

Calculated Physical Properties

Relative Density Real Gas	0.7581	C6+	3.2176
Calculated Molecular Weight	21.88		93.19
Compressibility Factor	0.9961		

GPA 2172 Calculation:

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

Real Gas Dry BTU	1285	5113
Water Sat. Gas Base BTU	1263	5024
Ideal, Gross HV - Dry at 14.65 psia	1280.0	5113.2
Ideal, Gross HV - Wet	1257.6	5023.7
Net BTU Dry Gas - real gas	1167	
Net BTU Wet Gas - real gas	1147	

Comments: H2S Field Content 2.5 ppm
 Mcf/day 186.55

Data reviewed by: Krystle Fitzwater, Laboratory Manager

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:** 12/29/2021**Duration of event:** 2 Hours 30 Minutes**MCF Flared:** 1100**Start Time:** 00:18 AM**End Time:** 2:48 AM**Cause:** Compression PLC Communication > Compression Equipment Shut Down**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:

This was a sudden and unexpected malfunction of the compression PLC losing communication with the sales gas compressors and triggering an automatic shutdown of the units. The compression PLC lost power due to an unexpected backup battery failure. The communications team was performing preventive maintenance on the backup UPS system, in which part of the required preventative maintenance work calls for load testing of the batteries. When testing the batteries, the communications team placed too much load on them which in turn caused the main power fuse to blow and stop working. Once that circumstance occurred, the compression PLC began running on battery backup power until the batteries died, which in turn triggered all the sales gas compression equipment to shut down and flaring to begin. The communications team and facility personnel were unaware that the compression PLC's main battery has ceased to function, and that the PLC was solely running on battery backup power until several alarms were received by the on-call field personnel indicating that the PLC was operating on battery backup. Once the compression PLC battery backup lost power, an alarm was received by the on-call Oxy production tech, which, informed him that all the compression equipment had malfunctioned and shutdown. The on-call production tech, enroute to the facility, quickly called for an additional production tech to assist him in shutting in multiple high GOR wells to minimize flaring, and called for an automation tech to arrive at the facility to assist with troubleshooting the compression PLC.

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, 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 flaring. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. Additionally, the on-call Oxy production tech called out additional field personnel to assist with troubleshooting the compression PLC issue and to assist in shutting in multiple high GOR wells to minimize flaring. The production techs and the automation tech worked diligently to ensure the compression PLC was restored back to main power usage and were able to restart all compression equipment without further issues.

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

OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected flaring event. It is OXY's policy to route its stranded gas to a flare 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 flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. As a potential remedy to prevent this type of circumstance occurring from happening in the future, the automation/communications team has been requested to include inspecting all power fuses to their preventive maintenance specifications.

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

DEFINITIONS

Action 72360

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 72360
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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.

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QUESTIONS

Action 72360

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 72360
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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 Operator	[192463] OXY USA WTP LIMITED PARTNERSHIP
Incident Type	Flare
Incident Status	Closure Not Approved
Incident Well	Not answered.
Incident Facility	[fAPP2126265645] TURKEY TRACK CTB

Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application.

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 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	No
Is this considered a submission for a vent or flare event	Yes, major 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 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	Emergency Flare > Compression PLC Communication > Compression Equipment Shut Down

Representative Compositional Analysis of Vented or Flared Natural Gas

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

Methane (CH4) percentage	76
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	2
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.

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QUESTIONS, Page 2

Action 72360

QUESTIONS (continued)

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	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/29/2021
Time vent or flare was discovered or commenced	12:18 AM
Time vent or flare was terminated	02:48 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: 1,100 Mcf Recovered: 0 Mcf Lost: 1,100 Mcf]
Other Released Details	Cause: Other (Specify) Released: 0 (Unknown Released Amount) Recovered: 0 Lost: 0]
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 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	This was a sudden and unexpected malfunction of the compression PLC losing communication with the sales gas compressors and triggering an automatic shutdown of the units. The compression PLC lost power due to an unexpected backup battery failure. The communications team was performing preventive maintenance on the backup UPS system, in which part of the required preventative maintenance work calls for load testing of the batteries. When testing the batteries, the communications team placed too much load on them which in turn caused the main power fuse to blow and stop working. Once that circumstance occurred, the compression PLC began running on battery backup power until the batteries died, which in turn triggered all the sales gas compression equipment to shut down and flaring to begin. The communications team and facility personnel were unaware that the compression PLC's main battery has ceased to function, and that the PLC was solely running on battery backup power until several alarms were received by the on-call field personnel indicating that the PLC was operating on battery backup. Once the compression PLC battery backup lost power, an alarm was received by the on-call Oxy production tech, which, informed him that all the compression equipment had malfunctioned and shutdown. The on-call production tech, enroute to the facility, quickly called for an additional production tech to assist him in shutting in multiple high GOR wells to minimize flaring, and called for an automation tech to arrive at the facility to assist with troubleshooting the compression PLC.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route its stranded gas to a flare 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 flaring. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. Additionally, the on-call Oxy production tech called out additional field personnel to assist with troubleshooting the compression PLC issue and to assist in shutting in multiple high GOR wells to minimize flaring. The production techs and the automation tech worked diligently to ensure the compression PLC was restored back to main power usage and were able to restart all compression equipment without further issues.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected flaring event. It is OXY's policy to route its stranded gas to a flare 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 flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. As a potential remedy to prevent this type of circumstance occurring from happening in the future, the automation/communications team has been requested to include inspecting all power fuses to their preventive maintenance specifications.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
<input checked="" type="checkbox"/>	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
<input checked="" type="checkbox"/>	I hereby certify the statements in this amending 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.

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CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
marialuna2	If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	1/13/2022