



## Certificate of Analysis

Number: 6030-21030124-006A

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. 12, 2021

Field:	Mesa Verde	Sampled By:	Javier Lazo
Station Name:	Mesa Verde BSU 18H LG	Sample Of:	Gas Spot
Station Number:	155381	Sample Date:	03/10/2021 09:30
Station Location:	OXY	Sample Conditions:	1185 psia, @ 89 °F Ambient: 67 °F
Sample Point:	Meter Run	Effective Date:	03/10/2021 09:30
Formation:	Quarterly	Method:	GPA-2261M
County:	Lea	Cylinder No:	5030-01186
Type of Sample:	Spot-Cylinder	Instrument:	70104251 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	03/08/2021 0:00 AM
Sampling Method:	Fill and Purge	Analyzed:	03/12/2021 13:31:22 by EJ R
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+	6.195
Nitrogen	1.367	1.362	1.750		GPM TOTAL C3+	2.934
Methane	75.196	74.948	55.148		GPM TOTAL iC5+	0.331
Carbon Dioxide	1.568	1.563	3.155			
Ethane	12.258	12.217	16.849	3.261		
Propane	6.378	6.357	12.857	1.748		
Iso-butane	0.810	0.807	2.151	0.264		
n-Butane	1.884	1.878	5.006	0.591		
Iso-pentane	0.325	0.324	1.072	0.118		
n-Pentane	0.325	0.324	1.072	0.117		
Hexanes Plus	0.221	0.220	0.940	0.096		
	100.332	100.000	100.000	6.195		

## Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7553	3.2176
Calculated Molecular Weight	21.80	93.19
Compressibility Factor	0.9963	

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1259	5113
Water Sat. Gas Base BTU	1237	5024
Ideal, Gross HV - Dry at 14.65 psia	1253.9	5113.2
Ideal, Gross HV - Wet	1232.0	5023.7
Net BTU Dry Gas - real gas	1142	
Net BTU Wet Gas - real gas	1123	

**Comments:** H<sub>2</sub>S Field Content 0 ppm  
Mcf/day 839

Hydrocarbon Laboratory Manager

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:** Mesa Verde 18 CTB**Date:** 04/22/2022**Duration of event:** 40 Minutes**MCF Flared:** 159**Start Time:** 07:02 PM**End Time:** 07:42 PM**Cause:** Downstream Activity> Enlink > Electrical Issues**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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**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. In this case, this sudden and unexpected flaring event occurred due to third party pipeline operator, Enlink's downstream facility, Lobo station, were having power loss and subsequent equipment issues, which in turn, caused the line pressure to spike extremely high, instigating Enlink to restrict the volume of gas Oxy was not allowed to be pushed into the Enlink gas services system pipeline. Enlink's facility and its equipment issues are downstream of Oxy's custody transfer point yet greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which then activated a flaring event at Oxy's upstream facility. Until Enlink's downstream facility was able to handle the volume of gas sent to them, the spike in line pressure forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into its secondary offload operator's, DCP, gas pipeline. No advance warning of any kind was provided to Oxy personnel from Enlink personnel regarding issues with their gas service system pipeline, and/or issues with their downstream facility. Oxy personnel had to contact Enlink directly when flaring started at its upstream facility to determine cause, as all Oxy's facility equipment were operating as designed prior to the flaring event occurring.

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route all 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, increased sensor pressure/level alarms, other process equipment issues, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order 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. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as

much as possible. In this case, Oxy production techs contacted Enlink personnel immediately upon rising high pressure line alarms and subsequent flare alarm received, to determine cause of the increase in Enlink's line pressure which triggered a flaring event. On-call production techs arrived at the facility soon after to monitor the flare and ensure its facility equipment were not affected by the unexpected shut-in and rising high pressure in Enlink's line. Prior to the spike in Enlink's pipeline pressure, which impacted Oxy's ability to send all its gas to them, Oxy's compression equipment was running and operating at maximized optimization. Flaring did not occur until Enlink's downstream facility was unable to handle the volume of gas loads sent to them. This incident was completely out of Oxy's control to prevent from happening. OXY made every effort to control and minimize emissions as much as possible during this event.

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

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enlink gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enlink's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, is out of Oxy's control to avoid or prevent from happening yet directly impacts Oxy's ability to send gas to them and causes Oxy's upstream facility to flare. When Enlink's downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enlink then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the its secondary offload gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enlink personnel during these types of situations.

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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 105497

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105497
	Action Type: [C-129] Venting and/or Flaring (C-129)

DEFINITIONS

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul>
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QUESTIONS

Action 105497

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105497
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b>	
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	Not answered.
Incident Facility	[fAPP2126659618] MESA VERDE 18 CTB

<b>Determination of Reporting Requirements</b>	
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, 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 <b>at least 50 MCF</b> of natural gas vented and/or flared during this event	Yes
Did this vent or flare 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 vent or flare within an incorporated municipal boundary or withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Downstream Activity> Enlink > Electrical Issues

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	75
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	2
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 105497

QUESTIONS (continued)

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:  16696
	Action Number:  105497
	Action Type:  [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	04/22/2022
Time vent or flare was discovered or commenced	07:02 PM
Time vent or flare was terminated	07:42 PM
Cumulative hours during this event	1

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: 159 Mcf   Recovered: 0 Mcf   Lost: 159 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 this vent or flare a result of downstream activity	Yes
Was notification of downstream activity received by this operator	No
Downstream OGRID that should have notified this operator	[320009] ENLINK MIDSTREAM OPERATING, LP
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	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. In this case, this sudden and unexpected flaring event occurred due to third party pipeline operator, Enlink's downstream facility, Lobo station, were having power loss and subsequent equipment issues, which in turn, caused the line pressure to spike extremely high, instigating Enlink to restrict the volume of gas Oxy was not allowed to be pushed into the Enlink gas services system pipeline. Enlink's facility and its equipment issues are downstream of Oxy's custody transfer point yet greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which then activated a flaring event at Oxy's upstream facility. Until Enlink's downstream facility was able to handle the volume of gas sent to them, the spike in line pressure forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into its secondary offload operator's, DCP, gas pipeline. No advance warning of any kind was provided to Oxy personnel from Enlink personnel regarding issues with their gas service system pipeline, and/or issues with their downstream facility. Oxy personnel had to contact Enlink directly when flaring started at its upstream facility to determine cause, as all Oxy's facility equipment were operating as designed prior to the flaring event occurring.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route all 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, increased sensor pressure/level alarms, other process equipment issues, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order 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. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. In this case, Oxy production techs contacted Enlink personnel immediately upon rising high pressure line alarms and subsequent flare alarm received, to determine cause of the increase in Enlink's line pressure which triggered a flaring event. On-call production techs arrived at the facility soon after to monitor the flare and ensure its facility equipment were not affected by the unexpected shut-in and rising high pressure in Enlink's line. Prior to the spike in Enlink's pipeline pressure, which impacted Oxy's ability to send all its gas to them, Oxy's compression equipment was running and operating at maximized optimization. Flaring did not occur until Enlink's downstream facility was unable to handle the volume of gas loads sent to them.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enlink gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enlink's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, is out of Oxy's control to avoid or prevent from happening yet directly impacts Oxy's ability to send gas to them and causes Oxy's upstream facility to flare. When Enlink's downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enlink then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the its secondary offload gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enlink personnel during these types of situations.

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ACKNOWLEDGMENTS

Action 105497

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**ACKNOWLEDGMENTS**

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be a <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to this operator) to track any C-129 forms, pursuant to 19.15.27.7 and 19.15.28.8 NMAC and understand that this submission meets the notification requirements of Paragraph (1) of Subsection G and F respectively.
<input checked="" type="checkbox"/>	I hereby certify the statements in this 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 an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	5/9/2022