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 CDP (Gas Gathering) **Date:** 04/23/2022

Duration of event: 1 Hour 45 Minutes **MCF Flared:** 175

Start Time: 12:00 AM **End Time:** 01:45 AM

Cause: Downstream Activity> DCP> Soured Out

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, DCP, whose DCP Linam Ranch, were having sour gas issues and subsequently shut their plant down unexpectedly, which in turn, caused the line pressure to spike extremely high, instigating DCP to restrict and later on, shut their valve in to the volume of gas Oxy was not allowed to be pushed into the DCP gas services system pipeline. DCP and DCP Linam Ranch 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 DCP was able to handle the volume of gas sent to them, the shut-in and 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 a secondary offload operator, so Oxy had to have their wells shut-in remotely. DCP did contact OXY personnel to inform them of the high H2S issues they were having and advised OXY to shut in as much as possible. Once the wells were shut in, the pressure eased enough so that the flaring ceased. Oxy personnel kept in touch with DCP personnel during this event. All of 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, DCP did contact OXY personnel to inform them of the high H2S issues they were having and advised OXY to shut in as much as possible. Once the wells were shut in, the pressure eased enough so that the flaring ceased. Oxy personnel kept in touch with DCP personnel during this event. All of Oxy's facility equipment were operating as designed prior to the flaring event occurring. 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 DCP 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. DCP'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 DCP'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, DCP then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into an available 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 DCP 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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105498
	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:

- 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 105498

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105498
	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	*Not answered.*
Incident Facility	**[fAPP2127060337] COVINGTON GATHERING**

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 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 **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 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> Soured Out

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.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105498
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	04/23/2022
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	01:45 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: 175 Mcf | Recovered: 0 Mcf | Lost: 175 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	Yes
Downstream OGRID that should have notified this operator	[234374] DCP MIDSTREAM, L.P.
Date notified of downstream activity requiring this vent or flare	04/23/2022
Time notified of downstream activity requiring this vent or flare	12:00 AM

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, DCP, whose DCP Linam Ranch, were having sour gas issues and subsequently shut their plant down unexpectedly, which in turn, caused the line pressure to spike extremely high, instigating DCP to restrict and later on, shut their valve in to the volume of gas Oxy was not allowed to be pushed into the DCP gas services system pipeline. DCP and DCP Linam Ranch 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 DCP was able to handle the volume of gas sent to them, the shut-in and 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 a secondary offload operator, so Oxy had to have their wells shut-in remotely. DCP did contact OXY personnel to inform them of the high H2S issues they were having and advised OXY to shut in as much as possible. Once wells were shut in, the pressure eased enough so that the flaring ceased. Oxy personnel kept in touch with DCP personnel during this event. All of Oxy's facility equipment were operating as designed prior to flaring 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, DCP did contact OXY personnel to inform them of the high H2S issues they were having and advised OXY to shut in as much as possible. Once the wells were shut in, the pressure eased enough so that the flaring ceased. Oxy personnel kept in touch with DCP personnel during this event. All of Oxy's facility equipment were operating as designed prior to the flaring event occurring. OXY made every effort to control and minimize emissions as much as possible during this event.
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 DCP 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. DCP'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 DCP'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, DCP then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into an available 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 DCP personnel during these types of situations.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105498
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	I acknowledge that I am authorized to submit a *Venting and/or Flaring* (C-129) report on behalf of this operator and understand that this report can be **a complete** C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
☑	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.
☑	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.
☑	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.
☑	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

Action 105498

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 105498
	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.	5/9/2022