



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:** 05/17/2022**Duration of event:** 2 Hours**MCF Flared:** 150**Start Time:** 01:00 PM**End Time:** 03:00 PM**Cause:** Compressor Malfunctions > False Voltage Alarms**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

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. In this case, USA sales gas compressor #2 had shut down on multiple malfunction alarms on an intermittent basis while USA Compression's compressor mechanic was performing scheduled preventive maintenance on gas lift unit #2. All sales gas and gas lift compressor units, with the exception of gas lift unit #2, were working as designed and operated normally prior to the sudden and without warning compressor malfunctions of sales gas compressor unit #2. 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:

Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. Notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur. Oxy's operation and maintenance practices were unable to prevent this event from happening as this event could not have been foreseen, avoided or prevented due to 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 or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, due to malfunction and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. In this case, Oxy production techs were already on-site when sales gas compressor unit # 2 kept malfunctioning on a low voltage alarm while gas lift unit # 2 was undergoing scheduled maintenance by a USA compression compressor mechanic, which in turn, triggered intermittent flaring during this event. After sales gas unit # 2 malfunctioned for the second time, an Oxy production tech requested USA Compression mechanic send out an additional mechanic to determine cause

of a recurring low voltage alarm on this particular unit. After the second compressor mechanic arrived to solely troubleshoot sales gas compressor unit # 2, it was determined that a loose harness was affecting the voltage sensor. The compressor mechanic quickly adjusted the loose harness and replaced the voltage sensor before restarting the unit. Once the unit was restarted, the compressor mechanic and the Oxy production techs remained on-site to ensure no further issues occurred. It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as part of the steps to take to limit duration and magnitude of flaring. The flare has a 98% combustion efficiency in order to minimize emissions as much as possible. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.

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

Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur, thereby, triggering the unit's sensors to automatically shut down the unit to avoid catastrophic damage to the internal engine components. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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District IV
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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 112855

DEFINITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 112855
	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 112855

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 112855
	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	[fAPP2126265645] TURKEY TRACK CTB

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, 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 > Compressor Malfunction > False Voltage Alarms

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 112855

QUESTIONS (continued)

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	Action Number: 112855
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	05/17/2022
Time vent or flare was discovered or commenced	01:00 PM
Time vent or flare was terminated	03:00 PM
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: 150 Mcf Recovered: 0 Mcf Lost: 150 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	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 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. In this case, USA sales gas compressor #2 had shut down on multiple malfunction alarms on an intermittent basis while USA Compression's compressor mechanic was performing scheduled preventive maintenance on gas lift unit #2. All sales gas and gas lift compressor units, with the exception of gas lift unit #2, were working as designed and operated normally prior to the sudden and without warning compressor malfunctions of sales gas compressor unit #2. 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 vent or flare	Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. Notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur. Oxy's operation and maintenance practices were unable to prevent this event from happening as this event could not have been foreseen, avoided or prevented due to 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 or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, due to malfunction and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions. In this case, Oxy production techs were already on-site when sales gas compressor unit # 2 kept malfunctioning on a low voltage alarm while gas lift unit # 2 was undergoing scheduled maintenance by a USA compression compressor mechanic, which in turn, triggered intermittent flaring during this event. After sales gas unit # 2 malfunctioned for the second time, an Oxy production tech requested USA Compression mechanic send out an additional mechanic to determine cause of a recurring low voltage alarm on this particular unit. After the second compressor mechanic arrived to solely troubleshoot sales gas compressor unit # 2, it was determined that a loose harness was affecting the voltage sensor.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur, thereby, triggering the unit's sensors to automatically shut down the unit to avoid catastrophic damage to the internal engine components. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	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 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

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	Action Number: 112855
	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.	6/1/2022