



# Certificate of Analysis

Number: 6030-22030084-001A

**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. 07, 2022

Field:	Platinum	Sampled By:	Michael Mirabal
Station Name:	Platinum CTB Train 2	Sample Of:	Gas Spot
Station Number:	17422c	Sample Date:	03/03/2022 11:26
Sample Point:	Meter	Sample Conditions:	11081 psig
Meter Number:		Effective Date:	03/03/2022 11:26
County:	Eddy	Method:	GPA-2261M
Type of Sample:	Spot-Cylinder	Cylinder No:	1111-003938
Heat Trace Used:	N/A	Instrument:	70142339 (Inficon GC-MicroFusion)
Sampling Method:	Fill and Purge	Last Inst. Cal.:	03/07/2022 0:00 AM
Sampling Company:	OXY	Analyzed:	03/07/2022 12:28:38 by ERG

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	2.103	2.11939	2.618	
Carbon Dioxide	5.154	5.19486	10.083	
Methane	72.601	73.18069	51.776	
Ethane	10.387	10.46946	13.884	2.795
Propane	5.175	5.21583	10.143	1.434
Iso-Butane	0.667	0.67223	1.723	0.220
n-Butane	1.637	1.64967	4.229	0.519
Iso-Pentane	0.389	0.39201	1.247	0.143
n-Pentane	0.422	0.42557	1.354	0.154
Hexanes	0.282	0.28415	1.080	0.117
Heptanes	0.240	0.24222	1.070	0.112
Octanes	0.124	0.12509	0.630	0.064
Nonanes Plus	0.029	0.02883	0.163	0.016
	99.210	100.00000	100.000	5.574

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.67	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7856	4.4283

**GPA 2172 Calculation:**

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

Real Gas Dry BTU	1201.5	6974.4
Water Sat. Gas Base BTU	1181.0	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1197.0	6974.4
Ideal, Gross HV - Wet	1176.0	6852.4

**Comments:** H2S Field Content 0 ppm

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

### UPSET VENT EVENT SPECIFIC JUSTIFICATIONS FORM

**Facility:** Platinum CTB

**Vent Date:** 06/28/2022

**Duration of event:** 40 Minutes

**MCF Vented:** 154

**Start Time:** 01:00 AM

**End Time:** 01:40 AM

**Cause:** Weather Related Cause > Power Outage > Equipment Malfunction > VRU

**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:

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, an extreme weather storm caused a power outage at the facility, which prompted all operational equipment to shut down. Venting arose when the VRU automatically shut down as a result of the power outage caused by the extreme weather and the tank pressures rose above the venting threshold for the thief hatches on top of the tanks, which then triggered the tanks to vent. An Oxy production tech was on-site when the power outage occurred, and as he was unable to get power restored, he quickly called an electrician to come out to the facility and get power restored. Once power was restored and the VRU was operational again, did venting cease. The facility equipment was running and operating as designed prior to the power outage occurring.

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

In this case, an extreme weather storm caused a power outage at the facility, which prompted all operational equipment to shut down. Venting arose when the VRU automatically shut down as a result of the power outage caused by the extreme weather and the tank pressures rose above the venting threshold for the thief hatches on top of the tanks, which then triggered the tanks to vent. An Oxy production tech was on-site when the power outage occurred, and as he was unable to get power restored, he quickly called an electrician to come out to the facility and get power restored. Once power was restored and the VRU was operational again, did venting cease. The facility equipment was running and operating as designed prior to the power outage occurring. The facility equipment was running and operating as designed prior to the malfunctions occurring.

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

Oxy is limited in the corrective actions to eliminate the cause and reoccurrence of venting caused by extreme weather conditions affecting facility equipment. Notwithstanding normal equipment design and operation, emergencies, and malfunctions, can occur without warning, be sudden, unforeseeable, and unavoidable, even during extreme weather conditions. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. It is OXY's policy to flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, to minimize emissions as much as possible, yet, in this circumstance, a sudden and unexpected equipment malfunction prompted by a power outage as a result of extreme weather conditions caused venting to occur, which was unavoidable. OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected venting event.

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

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
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 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
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 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**

DEFINITIONS

Action 125569

**DEFINITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 125569
	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 125569

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 125569
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b>	
<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	[fAPP2126657589] PLATINUM CTB

<b>Determination of Reporting Requirements</b>	
<i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
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.
<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 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

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Venting > Weather Related Cause > Power Outage > Equipment Malfunction > VRU

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>	
<i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	73
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	5
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.

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QUESTIONS, Page 2

Action 125569

**QUESTIONS (continued)**

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

**QUESTIONS**

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	06/28/2022
Time vent or flare was discovered or commenced	01:00 AM
Time vent or flare was terminated	01:40 AM
Cumulative hours during this event	1

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Vented   Released: 154 Mcf   Recovered: 0 Mcf   Lost: 154 Mcf ]
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Mass Flow
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, an extreme weather storm caused a power outage at the facility, which prompted all operational equipment to shut down. Venting arose when the VRU automatically shut down as a result of the power outage caused by the extreme weather and the tank pressures rose above the venting threshold for the thief hatches on top of the tanks, which then triggered the tanks to vent. An Oxy production tech was on-site when the power outage occurred, and as he was unable to get power restored, he quickly called an electrician to come out to the facility and get power restored. Once power was restored and the VRU was operational again, did venting cease. The facility equipment was running and operating as designed prior to the power outage occurring.
Steps taken to limit the duration and magnitude of vent or flare	In this case, an extreme weather storm caused a power outage at the facility, which prompted all operational equipment to shut down. Venting arose when the VRU automatically shut down as a result of the power outage caused by the extreme weather and the tank pressures rose above the venting threshold for the thief hatches on top of the tanks, which then triggered the tanks to vent. An Oxy production tech was on-site when the power outage occurred, and as he was unable to get power restored, he quickly called an electrician to come out to the facility and get power restored. Once power was restored and the VRU was operational again, did venting cease. The facility equipment was running and operating as designed prior to the power outage occurring. The facility equipment was running and operating as designed prior to the malfunctions occurring.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions to eliminate the cause and reoccurrence of venting caused by extreme weather conditions affecting facility equipment. Notwithstanding normal equipment design and operation, emergencies, and malfunctions, can occur without warning, be sudden, unforeseeable, and unavoidable, even during extreme weather conditions. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. It is OXY's policy to flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, to minimize emissions as much as possible, yet, in this circumstance, a sudden and unexpected equipment malfunction prompted by a power outage as a result of extreme weather conditions caused venting to occur, which was unavoidable. OXY made every effort to control and minimize emissions as much as possible during this sudden and unexpected venting event.

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ACKNOWLEDGMENTS

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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

Action 125569

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	Action Number: 125569
	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.	7/14/2022