Certificate of Analysis

Number: 6030-22030204-001A

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. 14, 2022

Field:	Turkey Track	Sampled By:	Michael Mirabal
Station Name:	Turkey Track CTB Sales Check	Sample Of:	Gas Spot
Station Number:	14670c	Sample Date:	03/10/2022 01:30
Sample Point:	Meter	Sample Conditions:	700 psig, @ 94 °F Ambient: 48 °F
Meter Number:		Effective Date:	03/10/2022 01:30
County:	Eddy	Method:	GPA-2261M
Type of Sample:	Spot-Cylinder	Cylinder No:	1111-007242
Heat Trace Used:	N/A	Instrument:	70142339 (Inficon GC-MicroFusion)
Sampling Method:	Fill and Purge	Last Inst. Cal.:	03/14/2022 0:00 AM
Sampling Company:	OXY	Analyzed:	03/14/2022 11:13:54 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.885
Nitrogen	2.063	2.067	2.716		GPM TOTAL C3+	2.745
Methane	76.682	76.849	57.818		GPM TOTAL iC5+	0.478
Carbon Dioxide	0.216	0.216	0.446			
Ethane	11.740	11.766	16.592	3.140		
Propane	5.541	5.553	11.484	1.527		
Iso-butane	0.686	0.687	1.873	0.224		
n-Butane	1.637	1.641	4.473	0.516		
Iso-pentane	0.369	0.370	1.252	0.135		
n-Pentane	0.377	0.378	1.279	0.137		
Hexanes Plus	0.472	0.473	2.067	0.206		
	99.783	100.000	100.000	5.885		

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7386	3.2176
Calculated Molecular Weight	21.32	93.19
Compressibility Factor	0.9964	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1255	5113
Water Sat. Gas Base BTU	1233	5024
Ideal, Gross HV - Dry at 14.65 psia	1250.3	5113.2
Ideal, Gross HV - Wet	1228.4	5023.7
Net BTU Dry Gas - real gas	1139	
Net BTU Wet Gas - real gas	1119	

Comments: H2S Field Content 0 ppm
Mcf/day 9365

Hydrocarbon 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:** 07/09/2022

Duration of event: 1 Hour **MCF Flared:** 298

Start Time: 03:52 PM **End Time:** 04:52 PM

Cause: Compression Malfunctions > High Discharge Temperature & High Suction

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, this flaring event was triggered by sudden and unexpected multiple compressor malfunctions, which occurred one after the other. Gas sales compressor unit # 3 suddenly and unexpectedly malfunctioned on a high discharge temperature, while gas lift compressor unit # 1, #2, and # 3 malfunctioned due to high suction, which prompted the compressor units to shut down. This facility was unmanned, so as soon as the Oxy production tech receives compressor alarms regarding the malfunctioning compressor units, the production tech heads to the facility to determine cause and resolve the issues. Upon arrival at the facility, Oxy production tech immediately begins procedures to restart the gas compressor and the gas lift compressors but is unable to do so. The Oxy production tech quickly calls USA Compression to send out a compressor mechanic to trouble shoot the unit. A compressor mechanic was in the area and arrived at the facility rather timely and begins to troubleshoot each of the affected compressors. It was determined that sales gas compressor unit # 3 had bad valves, which were replaced, while gas lift units #1 and #3, had the suction controllers replaced. Gas lift unit #2 was simply restarted. Flaring ceased once all four units were brought back to working service and reached maximized operation optimization. These malfunctioning events are out of OXY's control. OXY made every effort to control and minimize emissions as much as possible. All other compression at the facility was maximized as much as possible to prevent long term flaring.

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

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 alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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. In this case, this flaring event was triggered by sudden and unexpected multiple compressor malfunctions, which occurred one after the other. Gas sales

compressor unit # 3 suddenly and unexpectedly malfunctioned on a high discharge temperature, while gas lift compressor unit # 1, #2, and # 3 malfunctioned due to high suction, which prompted the compressor units to shut down. This facility was unmanned, so as soon as the Oxy production tech receives compressor alarms regarding the malfunctioning compressor units, the production tech heads to the facility to determine cause and resolve the issues. Upon arrival at the facility, Oxy production tech immediately begins procedures to restart the gas compressor and the gas lift compressors but is unable to do so. The Oxy production tech quickly calls USA Compression to send out a compressor mechanic to trouble shoot the unit. A compressor mechanic was in the area and arrived at the facility rather timely and begins to troubleshoot each of the affected compressors. It was determined that sales gas compressor unit # 3 had bad valves, which were replaced, while gas lift units #1 and #3, had the suction controllers replaced. Gas lift unit #2 was simply restarted. Flaring ceased once all four units were brought back to working service and reached maximized operation optimization. These malfunctioning events are out of OXY's control. OXY made every effort to control and minimize emissions as much as possible. All other compression at the facility was maximized as much as possible to prevent long term flaring.

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure the flame is lit and meeting opacity requirements. Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions, sale gas compression or gas lift compression, as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this facility.

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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 WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 128233
	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 128233

QUESTIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 128233
	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 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 > Compression Malfunctions > High Discharge Temperature & High Suction

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	77
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
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 WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 128233
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	07/09/2022
Time vent or flare was discovered or commenced	03:52 PM
Time vent or flare was terminated	04:52 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: 298 Mcf | Recovered: 0 Mcf | Lost: 298 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, this flaring event was triggered by sudden and unexpected multiple compressor malfunctions, which occurred one after the other. Gas sales compressor unit # 3 suddenly and unexpectedly malfunctioned on a high discharge temperature, while gas lift compressor unit # 1, #2, and # 3 malfunctioned due to high suction, which prompted the compressor units to shut down. This facility was unmanned, so as soon as the Oxy production tech receives compressor alarms regarding the malfunctioning compressor units, the production tech heads to the facility to determine cause and resolve the issues. Upon arrival at the facility, Oxy production tech immediately begins procedures to restart the gas compressor and the gas lift compressors but is unable to do so. The Oxy production tech quickly calls USA Compression to send out a compressor mechanic to trouble shoot the unit. A compressor mechanic was in the area and arrived at the facility rather timely and begins to troubleshoot each of the affected compressors. It was determined that sales gas compressor unit # 3 had bad valves, which were replaced, while gas lift units #1 and #3, had the suction controllers replaced. Gas lift unit #2 was simply restarted. Flaring ceased once all four units were brought back to working service and reached maximized operation optimization. These malfunctioning events are out of OXY's control.
Steps taken to limit the duration and magnitude of vent or flare	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 alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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. In this case, this flaring event was triggered by sudden and unexpected multiple compressor malfunctions, which occurred one after the other. Gas sales compressor unit # 3 suddenly and unexpectedly malfunctioned on a high discharge temperature, while gas lift compressor unit # 1, #2, and # 3 malfunctioned due to high suction, which prompted the compressor units to shut down. This facility was unmanned, so as soon as the Oxy production tech receives compressor alarms regarding the malfunctioning compressor units, the production tech heads to the facility to determine cause and resolve the issues. Upon arrival at the facility, Oxy production tech immediately begins procedures to restart the gas compressor and the gas lift compressors but is unable to do so. The Oxy production tech quickly calls USA Compression to send out a compressor mechanic to trouble shoot the unit. A compressor mechanic was in the area and arrived at the facility rather timely and begins to troubleshoot each of the affected compressors.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure the flame is lit and meeting opacity requirements. Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions, sale gas compression or gas lift compression, as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this facility.

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ACKNOWLEDGMENTS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 128233
	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 128233

CONDITIONS

Operator: OXY USA WTP LIMITED PARTNERSHIP P.O. Box 4294 Houston, TX 772104294	OGRID: 192463
	Action Number: 128233
	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.	7/25/2022