



## Certificate of Analysis

Number: 6030-22030204-001A

Artesia Laboratory

200 E Main St.  
Artesia, NM 88210  
Phone 575-746-3481Chandler Montgomery  
Occidental Petroleum  
1502 W Commerce Dr.  
Carlsbad, NM 88220

Mar. 14, 2022

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

## Analytical Data

| Components       | Un-normalized<br>Mol % | Mol. %  | Wt. %   | GPM at<br>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

|                             |        |        |
|-----------------------------|--------|--------|
| Relative Density Real Gas   | Total  | C6+    |
|                             | 0.7386 | 3.2176 |
| Calculated Molecular Weight | 21.32  | 93.19  |
| Compressibility Factor      | 0.9964 |        |

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 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: H<sub>2</sub>S 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:** 07/14/2022**Duration of event:** 1 Hour**MCF Flared:** 130**Start Time:** 11:59 AM**End Time:** 12:59 PM**Cause:** Unscheduled Preventative Maintenance > Gas Lift Unit # 4 > Well Surges**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:**

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

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, USA Compression sent a compressor mechanic to perform scheduled maintenance on their gas lift compressor unit # 4, yet, failed to inform proper Oxy personnel, in advance, that such work was being scheduled and/or performed for this gas lift unit. Once gas lift unit #4 was shut down, the wells flowing to this facility began to surge. The Oxy production tech received the compressor malfunction alarm indicating that gas lift unit #4 was offline, as well as receiving a flaring alarm. Upon arrival to the facility, the Oxy production tech encounter USA Compression's compressor mechanic and was informed that preventative maintenance was being performed on gas lift unit # 4. The Oxy production tech remained on-site while the preventative maintenance work was performed and adjusted remaining active compression equipment when wells began surging intermittently. Once the preventative maintenance work was completed and gas lift unit # 4 was brought back to maximized working service, did intermittent flaring cease as all compression equipment were working and operated as designed.

**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, USA Compression sent a compressor mechanic to perform scheduled maintenance on their gas lift compressor unit # 4, yet, failed to inform proper Oxy personnel, in advance, that such work was being scheduled and/or performed for this gas lift unit. Once gas lift unit #4 was shut down, the wells flowing to this facility began to surge. The Oxy production tech received the compressor malfunction alarm indicating that gas lift unit #4 was offline, as well as receiving a

flaring alarm. Upon arrival to the facility, the Oxy production tech encounter USA Compression's compressor mechanic and was informed that preventative maintenance was being performed on gas lift unit # 4. The Oxy production tech remained on-site while the preventative maintenance work was performed and adjusted remaining active compression equipment when wells began surging intermittently. Once the preventative maintenance work was completed and gas lift unit # 4 was brought back to maximized working service, did intermittent flaring cease as all compression equipment were working and operated as designed. All other compression at the facility was maximized as much as possible to prevent long term flaring until gas lift unit #4 preventative maintenance work was completed and returned to normal working operations.

### **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 flaring caused by unexpected compression preventative maintenance work by the compression equipment's owner, USA Compression, when notice of such is not received. Typically, Oxy does its utmost best to communicate, coordinate and have personnel team members on-site, when preventative maintenance is scheduled in advance, and is informed of such actions that will be taking place so that advance preparations, such as having spare compression equipment ready and operational at neighboring facilities, are also made to ensure that flaring while this type of maintenance work is performed on compression equipment, does not occur. 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 continue with its compression equipment preventative maintenance program for this facility and increase communication with compression equipment owners regarding preventative maintenance work that is scheduled or plan to be scheduled.

**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**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
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 128749

DEFINITIONS

|                                                                                        |                                                        |
|----------------------------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA WTP LIMITED PARTNERSHIP<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>192463                                       |
|                                                                                        | Action Number:<br>128749                               |
|                                                                                        | Action Type:<br>[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 128749

**QUESTIONS**

|                                                                                        |                                                        |
|----------------------------------------------------------------------------------------|--------------------------------------------------------|
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|                                                                                        | Action Number:<br>128749                               |
|                                                                                        | Action Type:<br>[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                                               | No                                                |
| 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  |

**Equipment Involved**

|                                                           |                                                                                          |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------|
| Primary Equipment Involved                                | Other (Specify)                                                                          |
| Additional details for Equipment Involved. Please specify | Emergency Flare > Unscheduled Preventative Maintenance > Gas Lift Unit # 4 > Well Surges |

**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 (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 128749

QUESTIONS (continued)

|                                                                                        |                                                        |
|----------------------------------------------------------------------------------------|--------------------------------------------------------|
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|                                                                                        | Action Number:<br>128749                               |
|                                                                                        | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

QUESTIONS

| Date(s) and Time(s)                            |            |
|------------------------------------------------|------------|
| Date vent or flare was discovered or commenced | 07/14/2022 |
| Time vent or flare was discovered or commenced | 11:59 AM   |
| Time vent or flare was terminated              | 12:59 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: Repair and Maintenance   Other (Specify)   Natural Gas Flared   Released: 130 Mcf   Recovered: 0 Mcf   Lost: 130 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                                                      | 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, USA Compression sent a compressor mechanic to perform scheduled maintenance on their gas lift compressor unit # 4, yet, failed to inform proper Oxy personnel, in advance, that such work was being scheduled and/or performed for this gas lift unit. Once gas lift unit #4 was shut down, the wells flowing to this facility began to surge. The Oxy production tech received the compressor malfunction alarm indicating that gas lift unit #4 was offline, as well as receiving a flaring alarm. Upon arrival to the facility, the Oxy production tech encounter USA Compression's compressor mechanic and was informed that preventative maintenance was being performed on gas lift unit # 4. The Oxy production tech remained on-site while the preventative maintenance work was performed and adjusted remaining active compression equipment when wells began surging intermittently. Once the preventative maintenance work was completed and gas lift unit # 4 was brought back to maximized working service, did intermittent flaring cease as all compression equipment were working and operated as designed.                                                                                                                                                                                                                        |
| 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, USA Compression sent a compressor mechanic to perform scheduled maintenance on their gas lift compressor unit # 4, yet, failed to inform proper Oxy personnel, in advance, that such work was being scheduled and/or performed for this gas lift unit. Once gas lift unit #4 was shut down, the wells flowing to this facility began to surge. The Oxy production tech received the compressor malfunction alarm indicating that gas lift unit #4 was offline, as well as receiving a flaring alarm. Upon arrival to the facility, the Oxy production tech encounter USA Compression's compressor mechanic and was informed that preventative maintenance was being performed on gas lift unit # 4. The Oxy production tech remained on-site while the preventative maintenance work was performed and adjusted remaining active compression equipment when wells began surging intermittently. Once the preventative maintenance work was completed and gas lift unit # 4 was brought back to maximized working service, did intermittent flaring cease as all compression equipment were working and operated as designed. |
| 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 flaring caused by unexpected compression preventative maintenance work by the compression equipment's owner, USA Compression, when notice of such is not received. Typically, Oxy does its utmost best to communicate, coordinate and have personnel team members on-site, when preventative maintenance is scheduled in advance, and is informed of such actions that will be taking place so that advance preparations, such as having spare compression equipment ready and operational at neighboring facilities, are also made to ensure that flaring while this type of maintenance work is performed on compression equipment, does not occur. 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 continue with its compression equipment preventative maintenance program for this facility and increase communication with compression equipment owners regarding preventative maintenance work that is scheduled or plan to be scheduled.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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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 128749

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|                                                                                        |                                                        |
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|                                                                                        | Action Number:<br>128749                               |
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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. | 7/26/2022      |