

Field:

# Certificate of Analysis

Number: 6030-21060187-001A

Artesia Laboratory 200 E Main St. Artesia, NM 88210 Phone 575-746-3481

June 21, 2021

Chandler Montgomery Occidental Petroleum 1502 W Commerce Dr. Carlsbad, NM 88220

Lost Tank Sampled By: Michael Mirabal

Station Name: Lost Tank 30-19 Fed Com 1H Sample Of: Gas Spot Station Number: 16102T Sample Date: 06/16/2021 02:20 Station Location: CTB Sample Conditions: 113 psia, @ 92 °F Ambient: 95 °F

Sample Point:MeterEffective Date:06/16/2021 02:20Formation:QuarterlyMethod:GPA-2261MCounty:LeaCylinder No:1111-002369

Type of Sample: : Spot-Cylinder Instrument: 70104124 (Inficon GC-MicroFusion)

Heat Trace Used: N/A Last Inst. Cal.: 06/21/2021 0:00 AM

Sampling Method: Fill and Purge Analyzed: 06/21/2021 12:21:17 by EJR

Sampling Company: :SPL

## **Analytical Data**

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	5.748
Nitrogen	3.714	3.705	4.543		GPM TOTAL C3+	2.964
Methane	72.207	72.042	50.591		GPM TOTAL iC5+	0.710
Carbon Dioxide	4.233	4.223	8.135			
Ethane	10.455	10.431	13.730	2.784		
Propane	5.365	5.353	10.332	1.472		
Iso-butane	0.671	0.669	1.702	0.219		
n-Butane	1.794	1.790	4.554	0.563		
Iso-pentane	0.444	0.443	1.399	0.162		
n-Pentane	0.510	0.509	1.608	0.184		
Hexanes Plus	0.837	0.835	3.406	0.364		
	100.230	100.000	100.000	5.748		
Calculated Physical Pr	roperties	To	otal	C6+		
Relative Density Real G		0.79	915	3.2176		
Calculated Molecular W	eight	22	.84	93.19		
Compressibility Factor		0.99	962			
<b>GPA 2172 Calculation:</b>	1					
<b>Calculated Gross BTU</b>	per ft <sup>3</sup> @ 14.65 ps	sia & 60°F				
Real Gas Dry BTU		12	209	5113		
Water Sat. Gas Base BTU		11	188	5024		
Ideal, Gross HV - Dry at 14.65 psia		120	4.2	5113.2		
Ideal, Gross HV - Wet		118	3.1	5023.7		
Net BTU Dry Gas - real gas		10	98			
Net BTU Wet Gas - real	gas	10	079			

Comments: H2S Field Content 0 ppm

Mcf/day 3276

Jesus Escobedo

Data reviewed by: Eric Ramirez, Analyst

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality

assurance, unless otherwise stated. 44

#### **UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**

Facility: Lost Tank 18 CPF Flare Date: 09/14/2022

**Duration of event:** 1 Hour 10 Minutes **MCF Flared:** 847.42

Start Time: 12:00 AM End Time: 01:10 AM

Cause: Third party operated downstream facility > Mark West > Facility issues > Liquid Issues and Pig

Running > Miscommunication

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This event is a continuation from September 13, 2022, which began approximately around 11:20

AM to September 14, 2022, approximately ending at 01:10 AM.

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

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. In this case, this event lasted within a two-day period beginning on September 13, 2022, approximately around 11:20 AM, during DCP's scheduled maintenance downtime, in which Oxy coordinated and engaged its secondary offloading plans by routing its gas to third party downstream pipeline operator, Mark West. Unfortunately, Mark West's downstream plant, had issues which affected the Lost Tank 18 CPF's operations and equipment, from September 13, 2022, to September 14, 2022, during DCP's scheduled maintenance downtime. Mark West's plant facility began to encounter liquid issues on September 13, 2022 and requested Oxy personnel for rate cuts in the gas volume being sent to them, while they were also making remote automated adjustments with very little notice to Oxy to adjust their flow rates, before they completely shut in their service pipeline system to Oxy, with no advance notice of this action. In addition, Mark West's plant also began running pigs to identify and resolve additional issues they were having with their service pipeline system, which carried over to September 14, 2022. Regrettably, Mark West personnel continually provided ambiguous information on both days as to when they would resume full and normal operations, which caused Oxy personnel to consistently shut and open wells in anticipation of sending gas, which in turn, then wouldn't occur, which then caused large amounts of gas to flare until wells could be shut in again. This event could not have been avoided or prevented from happening as third party owned and operated Mark West's downstream facility unexpectedly had issues which they needed to resolve and unexpectedly shut in their pipeline to Oxy. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.

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

It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility

has a 98% combustion efficiency to lessen emissions as much as possible. In this case, this event lasted within a two-day period beginning on September 13, 2022, approximately around 11:20 AM, during DCP's scheduled maintenance downtime, in which Oxy coordinated and engaged its secondary offloading plans by routing its gas to third party downstream pipeline operator, Mark West. Unfortunately, Mark West's downstream plant, had issues which affected the Lost Tank 18 CPF's operations and equipment, from September 13, 2022, to September 14, 2022, during DCP's scheduled maintenance downtime. Mark West's plant facility began to encounter liquid issues on September 13, 2022 and requested Oxy personnel for rate cuts in the gas volume being sent to them, while they were also making remote automated adjustments with very little notice to Oxy to adjust their flow rates, before they completely shut in their service pipeline system to Oxy, with no advance notice of this action. In addition, Mark West's plant also began running pigs to identify and resolve additional issues they were having with their service pipeline system, which carried over to September 14, 2022. Regrettably, Mark West personnel continually provided ambiguous information on both days as to when they would resume full and normal operations, which caused Oxy personnel to consistently shut and open wells in anticipation of sending gas, which in turn, then wouldn't occur, which then caused large amounts of gas to flare until wells could be shut in again. This event could not have been avoided or prevented from happening as third party owned and operated Mark West's downstream facility unexpectedly had issues which they needed to resolve and unexpectedly shut in their pipeline to Oxy. 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 cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Mark West downstream facility or gas plant shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid, prevent from happening or reoccurring. Mark West and its associated downstream facilities will have issues which will reoccur from time to time, and its subsequent actions to reduce, curtail and/or perform any type of adjustments to its incoming flow intake rates, thusly, directly impacts Oxy's ability to send gas to them. When Mark West has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, this in turn, forces OXY's gas to route to the flare. OXY makes every effort to control and minimize emissions as much as possible when this circumstance occurs. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with third-party pipeline operator, Mark West, and its personnel during these types of situations.

District I
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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

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 150171

#### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	150171
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

#### **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 150171

## **QUESTIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294 Houston, TX 772104294	Action Number: 150171
	Action Type:  [C-129] Amend Venting and/or Flaring (C-129A)

### 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 Operator	[16696] OXY USA INC	
Incident Type	Flare	
Incident Status	Closure Not Approved	
Incident Well	[30-025-46474] LOST TANK 30 19 FEDERAL COM #001H	
Incident Facility	Not answered.	
Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application.		

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, major 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 <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 > Third party operated downstream facility > Mark West > Facility issues > Liquid Issues and Pig Running > Miscommunication	

Representative Compositional Analysis of Vented or Flared Natural Gas		
Please provide the mole percent for the percentage questions in this group.		
Methane (CH4) percentage	72	
Nitrogen (N2) percentage, if greater than one percent	4	
Hydrogen Sulfide (H2S) PPM, rounded up	0	
Carbon Dioxide (C02) percentage, if greater than one percent	4	
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, Page 2

Action 150171

QUESTIONS (c	ontinued)
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P.O. Box 4294	Action Number:
Houston, TX 772104294	150171
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)
•	

## QUESTIONS

Date(s) and Time(s)		
Date vent or flare was discovered or commenced	09/14/2022	
Time vent or flare was discovered or commenced	12:00 AM	
Time vent or flare was terminated	01:10 AM	
Cumulative hours during this event	1	

leasured 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: 847 Mcf   Recovered: 0 Mcf   Lost: 847 Mcf	
Other Released Details	Not answered.	
Additional details for Measured or Estimated Volume(s). Please specify	Gas Flare Meter	
Is this a gas only submission (i.e. only significant Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.	

Venting or Flaring Resulting from Downstream Activity		
Was this vent or flare a result of downstream activity	Yes	
Was notification of downstream activity received by this operator	Yes	
Downstream OGRID that should have notified this operator	[329252] MarkWest Energy West Texas Gas Company, L.L.C	
Date notified of downstream activity requiring this vent or flare	09/13/2022	
Time notified of downstream activity requiring this vent or flare	11:10 AM	

Steps and Actions to Prevent Waste				
For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control	True			
Please explain reason for why this event was beyond this operator's control	In this case, this event lasted within a two-day period beginning on September 13, 2022, approximately around 11:20 AM, during DCP's scheduled maintenance downtime, in which Oxy coordinated and engaged its secondary offloading plans by routing its gas to third party downstream pipeline operator, Mark West. Unfortunately, Mark West's downstream plant, had issues which affected the Lost Tank 18 CPF's operations and equipment, from September 13, 2022, to September 14, 2022, during DCP's scheduled maintenance downtime. Mark West's plant facility began to encounter liquid issues on September 13, 2022, and requested Oxy personnel for rate cuts in the gas volume being sent to them, while they were also making remote automated adjustments with very little notice to Oxy to adjust their flow rates, before they completely shut in their service pipeline system to Oxy, with no advance notice of this action. In addition, Mark West's plant also began running pigs to identify and resolve additional issues they were having with their service pipeline system, which carried over to September 14, 2022. Regrettably, Mark West personnel continually provided ambiguous information on both days as to when they would resume full and normal operations, which caused Oxy personnel to consistently shut and open wells in anticipation of sending gas, which in turn, then wouldn't occur, which then caused large amounts of gas to flare until wells could be shut in again. This event could not have been avoided or prevented from happening as third party owned and operated Mark West's downstream facility unexpectedly had issues which they needed to resolve and unexpectedly shut in their pipeline to Oxy. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.			
Steps taken to limit the duration and magnitude of vent or flare	In this case, this event lasted within a two-day period beginning on September 13, 2022, approximately around 11:20 AM, during DCP's scheduled maintenance downtime, in which Oxy coordinated and engaged its secondary offloading plans by routing its gas to third party downstream pipeline operator, Mark West. Unfortunately, Mark West's downstream plant, had issues which affected the Lost Tank 18 CPF's operations and equipment, from September 13, 2022, to September 14, 2022, during DCP's scheduled maintenance downtime. Mark West's plant facility began to encounter liquid issues on September 13, 2022 and requested Oxy personnel for rate cuts in the gas volume being sent to them, while they were also making remote automated adjustments with very little notice to Oxy to adjust their flow rates, before they completely shut in their service pipeline system to Oxy, with no advance notice of this action. In addition, Mark West's plant also began running pigs to identify and resolve additional issues they were having with their service pipeline system, which carried over to September 14, 2022. Regrettably, Mark West personnel continually provided ambiguous information on both days as to when they would resume full and normal operations, which caused Oxy personnel to consistently shut and open wells in anticipation of sending gas, which in turn, then wouldn't occur, which then caused large amounts of gas to flare until wells could be shut in again. This event could not have been avoided or prevented from happening as third party owned and operated Mark West's downstream facility unexpectedly had issues which they needed to resolve and unexpectedly shut in their pipeline to Oxy. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible.			
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ACKNOWLEDGMENTS

Action 150171

### **ACKNOWLEDGMENTS**

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	[	Action Type:
		[C-129] Amend Venting and/or Flaring (C-129A)

#### **ACKNOWLEDGMENTS**

$\checkmark$	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
V	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
V	I hereby certify the statements in this amending 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.
V.	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.
V	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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#### CONDITIONS

Created By	Condition	Condition Date
marialuna	If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	10/11/2022