Monthly Meter Analysis

December, 2021

Meter #: 13135072
Name: COVINGTON REC POGO

Sample
Date: 07/28/2021
Type: Spot

Pressure:	71.0	H2O:	lbs/mm
Temperature:	88.0	H2S:	ppm

Component	Mole %	Liquid Content	Mass %
Carbon Dioxide, CO2	4.5919		8.4970
Nitrogen, N2	4.0256		4.7416
Methane, C1	68.4806		46.1923
Ethane, C2	10.7997	2.8993	13.6541
Propane, C3	7.3713	2.0385	13.6669
Isobutane, iC4	0.8613	0.2829	2.1049
n-Butane, nC4	2.0964	0.6634	5.1231
Isopentane, iC5	0.5334	0.1958	1.6183
n-Pentane, nC5	0.5196	0.1891	1.5763
Hexanes Plus, C6+	0.7202	0.3039	2.8255
Water, H2O			
Hydrogen Sulfide, H2S			
Oxygen, O2			
Carbon Monoxide, CO			
Hydrogen, H2			
Helium, He			
Argon, Ar			
Totals	100.0000	6.5729	100.0000

Property	Total Sample
Pressure Base	14.730
Temperature Base	60.00
Relative Density	0.8242
HV, Dry @ Base P,T	1251.09
HV, Sat @ Base P, T	1229.20
HV, Sat @ Sample P, T	
Fws Factor	
Cricondentherm	
HCDP @ Sample Pressure	
Free Water GPM	
Stock Tank Condensate Brls/mm	
26 # RVP Gasoline	1.032
Testcar Permian	0.942
Testcar Panhandle	0.802
Testcar Midcon	0.703

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Covington CPD Battery **Flare Date:** 09/13/2022

Duration of event: 7 Hours **MCF Flared:** 104

Start Time: 11:00 AM **End Time:** 6:00 PM

Cause: Downstream Activity Issue > DCP > Mark West > Facility Equipment Issues

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This upset event was not caused by any wells associated with the facility.

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

This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable 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 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 was a sudden and reasonably unforeseeable incident outside of OXY's control, but that impacted OXY's upstream facility. DCP has been down due to scheduled plant maintenance so therefore OXY engaged in its alternative offload plans by sending its gas to Mark West instead. Unfortunately, third-party pipeline operator, Mark West, who owns and operates their sales gas service system pipeline, did not provide advance notice of the disruption to their sales gas service system pipeline due to unforeseen issues on their end.

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 line 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, the production technician contacted the well analyst to remotely shut down several wells to minimize flaring as soon as it was known that Mark West was unable to take gas until they could resolve their equipment issues and get their compressors online. All OXY operations and facility equipment were running at maximized optimization prior to the shutdown of Mark West's downstream facility and their inability to take Oxy's volume of gas due to unforeseen issues. This incident was completely out of Oxy's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event.

The Covington CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's defined Covington area. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operational safety and start up procedures to allow some production to occur at the nearest facility, as it was necessary to maintain a minimal amount of gas flow to restart several facility's compression equipment, across the its area, when Mark West, third party downstream pipeline operator, was ready and able to start taking Oxy's gas once again. The minimal amount of gas flow allowed to be produced and flare was done out of necessity to protect personnel and equipment as a safeguard against potential issues that could occur when restarting production across the Covington area.

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 potential reoccurrence of a third party downstream pipeline operator's gas flow restriction or 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 DCP, will and its downstream facilities, may have issues, which will reoccur from time to time, such as a sudden and without warning complete shut-in and/or high line pressure spikes, which in turn, directly impacts Oxy's ability to send gas to them. When third-party downstream pipeline owners and operators has equipment issues or greatly struggles to handle the volume of gas being sent to them by Oxy, they then restrict Oxy's ability to send gas to them, which then prompts Oxy to route its stranded gas not pushed into their sales gas service system gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to continually communicate with third-party downstream pipeline service personnel during these types of situations.

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State of New Mexico
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Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 150033
	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 150033

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 150033
	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	**[fAPP2127060337] COVINGTON GATHERING**

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 > Downstream Activity Issue > DCP > Mark West > Facility Equipment Issues

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	68
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	5
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 INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 150033
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	09/13/2022
Time vent or flare was discovered or commenced	11:00 AM
Time vent or flare was terminated	06:00 PM
Cumulative hours during this event	7

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: 104 Mcf | Recovered: 0 Mcf | Lost: 104 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	No
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	*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 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 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 was a sudden and reasonably unforeseeable incident outside of OXY's control, but that impacted OXY's upstream facility. DCP has been down due to scheduled plant maintenance so therefore OXY engaged in its alternative offload plans by sending its gas to Mark West instead. Unfortunately, third-party pipeline operator, Mark West, who owns and operates their sales gas service system pipeline, did not provide advance notice of the disruption to their sales gas service system pipeline due to unforeseen issues on their end.
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 line 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, the production technician contacted the well analyst to remotely shut down several wells to minimize flaring as soon as it was known that Mark West was unable to take gas until they could resolve their equipment issues and get their compressors online. All OXY operations and facility equipment were running at maximized optimization prior to the shutdown of Mark West's downstream facility and their inability to take Oxy's volume of gas due to unforeseen issues. This incident was completely out of Oxy's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event. The Covington CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's defined Covington area. Oxy made every effort to shut in as much of production/wells as possible, yet it was absolutely critical to Oxy's operational safety & start up procedures to allow some production to occur at the nearest facility, as it was necessary to maintain a minimal amount of gas flow to restart several facility's compression equipment, across the its area, when Mark West, third party downstream.
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 potential reoccurrence of a third party downstream pipeline operator's gas flow restriction or 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 DCP, will and its downstream facilities, may have issues, which will reoccur from time to time, such as a sudden and without warning complete shut-in and/or high line pressure spikes, which in turn, directly impacts Oxy's ability to send gas to them. When third-party downstream pipeline owners and operators has equipment issues or greatly struggles to handle the volume of gas being sent to them by Oxy, they then restrict Oxy's ability to send gas to them, which then prompts Oxy to route its stranded gas not pushed into their sales gas service system gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to continually communicate with third-party downstream pipeline service personnel during these types of situations.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 150033
	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 150033

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 150033
	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.	10/11/2022