



Certificate of Analysis

Number: 6030-21110261-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Dec. 01, 2021

Field: Sand Dunes
Station Name: Sand Dunes CTB Production 2
Station Number: 17012P
Station Location: CTB
Sample Point: Meter
Formation: Monthly
County: Eddy, NM
Type of Sample: : Spot-Cylinder
Heat Trace Used: No
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Scott Beasley
Sample Of: Gas Spot
Sample Date: 11/23/2021 10:21
Sample Conditions: 77.7 psig, @ 62.5 °F Ambient: 61 °F
Effective Date: 11/23/2021 10:21
Method: GPA-2261M
Cylinder No: 1111-002678
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 11/15/2021 0:00 AM
Analyzed: 12/01/2021 14:47:44 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	1.720	1.73503	2.237	
Carbon Dioxide	1.746	1.76105	3.568	
Methane	75.250	75.89815	56.047	
Ethane	11.338	11.43562	15.828	3.052
Propane	5.503	5.55083	11.267	1.526
Iso-Butane	0.699	0.70513	1.887	0.230
n-Butane	1.672	1.68661	4.512	0.531
Iso-Pentane	0.353	0.35584	1.182	0.130
n-Pentane	0.377	0.38035	1.263	0.138
Hexanes	0.214	0.21574	0.856	0.089
Heptanes	0.170	0.17177	0.792	0.079
Octanes	0.080	0.08109	0.426	0.041
Nonanes Plus	0.023	0.02279	0.135	0.013
	99.145	100.00000	100.000	5.829

Calculated Physical Properties

Calculated Molecular Weight	Total	C9+
Compressibility Factor	21.72	128.26
Relative Density Real Gas	0.9963	
	0.7526	4.4283

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1243.1	6974.4
Water Sat. Gas Base BTU	1221.9	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1238.5	6974.4
Ideal, Gross HV - Wet	1216.9	6852.4

Comments: H2S Field Content 0 ppm
Mcf/day 24561.39

Jesus Escobedo

Carly Retana

Hydrocarbon Laboratory Manager

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

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Sand Dunes South Corridor CTB**Flare Date:** 11/26/2022**Duration of event:** 1 Hour 10 Minutes**MCF Flared:** 150**Start Time:** 06:50 AM**End Time:** 08:00 AM**Cause:** Venting > Facility Emergency Shutdown > Power Outage > Recloser Switch**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 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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of the VRU's being shut off due to two (2) power outages affecting the facility, within a 24-HR period. Notwithstanding facility design and operation, emergencies and malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.

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

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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of the VRU's being shut off due to two (2) power outages affecting the facility, within a 24-HR period. Notwithstanding facility design and operation, emergencies and malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable. Once power was restored to the facility, the VRU's were reset and brought back online. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. 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 is limited in its ability to take any corrective actions to eliminate the cause and potential reoccurrence of unexpected equipment malfunctions. 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 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 equipment preventative maintenance program for this facility.

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Phone:(575) 393-6161 Fax:(575) 393-0720
District II
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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 167962

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 167962
	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: <ul style="list-style-type: none">• 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 167962

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:	16696
	Action Number:	167962
	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	Unavailable.
Incident Facility	[fAPP2127048458] Sand Dunes South Corridor 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	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 within 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	Venting > Venting > Facility Emergency Shutdown > Power Outage > Recloser Switch

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	76
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	2
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 167962

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:
	16696
	Action Number:
	167962
Action Type:	
[C-129] Venting and/or Flaring (C-129)	

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	11/26/2022
Time vent or flare was discovered or commenced	06:50 AM
Time vent or flare was terminated	08:00 AM
Cumulative hours during this event	1

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Power Failure Other (Specify) Natural Gas Vented Released: 150 Mcf Recovered: 0 Mcf Lost: 150 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Estimate Vent Calculations
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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of the VRU's being shut off due to two (2) power outages affecting the facility, within a 24-HR period. Notwithstanding facility design and operation, emergencies and malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. 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	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. It is OXY's policy to route all stranded gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions, when possible, yet, in this case, this venting event occurred as a result of the VRU's being shut off due to two (2) power outages affecting the facility, within a 24-HR period. Notwithstanding facility design and operation, emergencies and malfunctions, can occur without warning, be sudden, unforeseeable and unavoidable. Once power was restored to the facility, the VRU's were reset and brought back online. Oxy continually strives to maintain and operate in a manner consistent with good practice for minimizing emissions and reducing the number of emission events. 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

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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 complete 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 167962

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	Action Number: 167962
	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.	12/17/2022