

#### Volumetrics Inc.

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

Company: OXY USA INC Field/Location: NMSW

Station Name: DIMENSIONS CTB TRAIN 1 CHECK

 Station Number :
 18521C

 Sample Date:
 4/6/22 11:00 AM

 Analysis Date:
 4/13/22 1:25 PM

 Instrument:
 VARIAN- CP 4900 GC

Calibration/Verification Date: 4/12/2022 Heat Trace used: YES 
 Work Order:
 4000551929

 Sampled by:
 OXY/JE

Sample Type: OXY/JE
Spot-Cylinder

Sample Temperature (F):81Sample Pressure (PSIG):76Flow rate (MCF/Day):19759.9Ambient Temperature (F):53

Sampling method: FILL & EMPTY

Cylinder Number: 27746

NATURAL GAS ANALYSIS: GPA 2261

	<b>Un-Normalized</b>	Normalized	GPM	GPM	GPM
Components	Mol%	Mol%	14.650	14.730	15.025
Hydrogen Sulfide	0.0000	0.0000			
Nitrogen	1.6778	1.7092			
Methane	74.5445	75.9409			
Carbon Dioxide	1.7368	1.7693			
Ethane	10.9843	11.1901	2.987	3.003	3.063
Propane	5.3008	5.4001	1.485	1.493	1.523
Isobutane	0.6800	0.6927	0.226	0.227	0.232
N-butane	1.6650	1.6962	0.534	0.537	0.547
Isopentane	0.3972	0.4046	0.148	0.148	0.151
N-Pentane	0.4579	0.4665	0.169	0.170	0.173
Hexanes(C6's)	0.3123	0.3182	0.131	0.131	0.134
Heptanes (C7's)	0.2557	0.2605	0.120	0.121	0.123
Octanes (C8's)	0.1124	0.1145	0.059	0.059	0.060
Nonanes Plus (C9+)	0.0365	0.0372	0.021	0.021	0.021
Total	09 1612	100 0000			

Total 98.1612 100.0000

Physical Properties (Calculated)	14.650 psia	14.730 psia	45 005 maia
Physical Properties (Calculated)	14.000 psia	14.730 psia	15.025 psia
Total GPM Ethane+	5.879	5.910	6.027
Total GPM Iso-Pentane+	0.647	0.650	0.662
Compressibility (Z)	0.9962	0.9962	0.9961
Specific Gravity ( Air=1) @ 60 °F	0.7593	0.7593	0.7594
Molecular Weight	21.917	21.917	21.917
Gross Heating Value	14.650 psia	14.730 psia	15.025 psia
Dry, Real (BTU/Ft <sup>3</sup> )	1253.7	1260.6	1285.9
Wet, Real (BTU/Ft <sup>3</sup> )	1231.8	1238.5	1263.4
Dry, Ideal (BTU/Ft <sup>3</sup> )	1249.0	1255.8	1280.9
Wet, Ideal (BTU/Ft <sup>3</sup> )	1227.1	1233.8	1258.5

Temperature base 60 °F

Comment: FIELD H2S =0 PPM

Verified by

Mostaq Ahammad Petroleum Chemist Approved by

Deann Friend

Deann Friend Laboratory Manager

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

Facility: Dimension 6 CTB Flare Date: 02/7/2023

**Duration of event:** 50 Minutes **MCF Flared:** 160

Start Time: 01:30 PM End Time: 02:20 PM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise > Emergency Shutdown

Method of Flared Gas Measurement: Gas Flare Meter

**Comments:** 

## 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 compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction o=complete shut-in of the gas pipeline by a third-party pipeline compression station 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.

### 2. 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. As soon as flaring was triggered, the facility's mitigation optimizer cut its injection rates to wells in the field to decrease injection and sales gas to reduce field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. 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 unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shutin, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise 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 Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

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

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 189986

#### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	189986
	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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1220 S. St Francis Dr., Santa Fe, NM 87505

# **State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 189986

Phone: (505) 476-3470 Fax: (505) 476-3462		
C	QUESTIONS	
Operator:		OGRID:
OXY USA INC P.O. Box 4294		16696
Houston, TX 772104294		Action Number: 189986
		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 w	ith the rest of the questions.
Incident Well	Unavailable.	
Incident Facility	[fAPP2126637631] DIMEN	ISION 6 CTB
Determination of Reporting Requirements		
Answer all questions that apply. The Reason(s) statements are calculated based on your answers a	and may provide addional guidanc	e.
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/o	r 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		
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 R	Party Downstream Activity > Enterprise > Emergency Shutdown
Description Comments of March 1 of March 1 of The 1 Natural Com		
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  Nitrogen (N2) percentage, if greater than one percent	2	
Hydrogen Sulfide (H2S) PPM, rounded up		
	0	
Carbon Dioxide (C02) percentage, if greater than one percent	2	
Oxygen (02) percentage, if greater than one percent	0	
If you are venting and/or flaring because of Pipeline Specification, please provide the required spe	cifications 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.	

QUESTIONS, Page 2

Action 189986

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Phone: (375) 393-6161 Fax: (375) 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 Fa. NM 87505

# **State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. Santa Fe. NM 87505

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462	Fe, MIVI 07505
QUESTI	ONS (continued)
Operator: OXY USA INC	OGRID: 16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	189986 Action Type:
	[C-129] Venting and/or Flaring (C-129)
QUESTIONS	
Date(s) and Time(s)	
Date vent or flare was discovered or commenced	02/07/2023
Time vent or flare was discovered or commenced	01:30 PM
Time vent or flare was terminated	02:20 PM
Cumulative hours during this event	1
Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Flared   Released: 160 Mcf   Recovered: 0 Mcf   Lost: 160 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.
Manting of Floring Resulting from Re	
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  Downstream OGRID that should have notified this operator	No I7427241 Enterprise Crude Bineline LLC
Date notified of downstream activity requiring this vent or flare	[713731] Enterprise Crude Pipeline LLC  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	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 compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction o=complete shut-in of the gas pipeline by a third-party pipeline compression station 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 beer avoided by good design, operation, and preventative maintenance practices. In this case, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could no have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.
Steps taken to limit the duration and magnitude of vent or flare	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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. As soon as flaring was triggered, the facility's mitigation optimizer cut its injection rates to wells in the field to decrease injection and sales gas to reduce field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shut-in, as this control issue is downstream of Oxy' custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enterprise 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 Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

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ACKNOWLEDGMENTS

Action 189986

### **ACKNOWLEDGMENTS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	189986
	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 189986

### **CONDITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	189986
	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.	2/23/2023