



Certificate of Analysis

Number: 6030-22030084-001A

Artesia Laboratory

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

Mar. 07, 2022

Field: Platinum
Station Name: Platinum CTB Train 2
Station Number: 17422c
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: 03/03/2022 11:26
Sample Conditions: 11081 psig
Effective Date: 03/03/2022 11:26
Method: GPA-2261M
Cylinder No: 1111-003938
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 03/07/2022 0:00 AM
Analyzed: 03/07/2022 12:28:38 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	2.103	2.11939	2.618	
Carbon Dioxide	5.154	5.19486	10.083	
Methane	72.601	73.18069	51.776	
Ethane	10.387	10.46946	13.884	2.795
Propane	5.175	5.21583	10.143	1.434
Iso-Butane	0.667	0.67223	1.723	0.220
n-Butane	1.637	1.64967	4.229	0.519
Iso-Pentane	0.389	0.39201	1.247	0.143
n-Pentane	0.422	0.42557	1.354	0.154
Hexanes	0.282	0.28415	1.080	0.117
Heptanes	0.240	0.24222	1.070	0.112
Octanes	0.124	0.12509	0.630	0.064
Nonanes Plus	0.029	0.02883	0.163	0.016
	99.210	100.00000	100.000	5.574

Calculated Physical Properties

	Total	C9+
Calculated Molecular Weight	22.67	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7856	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1201.5	6974.4
Water Sat. Gas Base BTU	1181.0	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1197.0	6974.4
Ideal, Gross HV - Wet	1176.0	6852.4

Comments: H2S Field Content 0 ppm

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:** Platinum NC 34 CTB**Flare Date:** 06/11/2023**Duration of event:** 1 Hour 40 Minutes**MCF Flared:** 190**Start Time:** 03:50 AM**End Time:** 05:30 AM**Cause:** Emergency Flare > Downstream Activity Issue > Enterprise > Central Station > Gas Detection > Emergency Shut Down**Method of Flared Gas Measurement:** Gas Flare Meter

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 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, third-party pipeline operator, Enterprise, had an unplanned emergency shutdown of their downstream central station facility, due to a gas detection alarm, which then triggered an ESD alarm, prompting the immediate shutdown of their facility and their sales gas valve to close. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility and caused an unanticipated and unavoidable flaring event at Oxy's upstream facility. Until Enterprise's downstream facility was returned to normal working operations and was able to handle the volume of gas sent to them, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline or offload all its stranded gas to another downstream pipeline operator. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, or the ESD system or valve, and/or issues with their downstream facility for this event. Oxy personnel had to contact Enterprise directly when flaring started at its upstream facility to determine cause, as all Oxy's facility equipment were operating as designed prior to the flaring event occurring.

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, 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. In this case, third-party pipeline operator, Enterprise, had an unplanned emergency shutdown of their downstream central station facility, due to a gas detection alarm, which then triggered an ESD alarm, prompting the immediate shutdown of their facility and their sales gas valve to close. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility and caused an unanticipated and unavoidable flaring event at Oxy's upstream facility. Until Enterprise's downstream facility was returned to normal working operations and was able to handle the volume of gas sent to them, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline or offload all its stranded gas to another downstream pipeline operator. As soon as flaring alarms were received by field personnel, they began making adjustments to the facility's well optimizer to shut in several high GOR wells. All OXY

operations and facility equipment were running at maximized optimization prior to the shutdown of Enterprise's downstream central station facility and their inability to take Oxy's volume of gas. 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.

3. Corrective Actions taken to eliminate the cause and reoccurrence of venting or flaring:

Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline emergency shutdown, restriction or shut in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route 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 during these circumstances. The limited actions that Oxy can do in this circumstance is to shut in multiple high GOR wells and engage in secondary third-party operator offload alternative routes, when possible, to minimize flaring volumes during this third-party pipeline operator downstream activity shutdown, restriction and/or shut in.

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

DEFINITIONS

Action 233065

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 233065
	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 233065

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:	16696
	Action Number:	233065
	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	[fAPP2126657589] PLATINUM 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 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 > Enterprise > Central Station > Gas Detection > Emergency Shut Down

Representative Compositional Analysis of Vented or Flared Natural Gas Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	73
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	5
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 Sufide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (C02) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

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QUESTIONS, Page 2

Action 233065

QUESTIONS (continued)

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	Action Number: 233065
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	06/11/2023
Time vent or flare was discovered or commenced	03:50 AM
Time vent or flare was terminated	05:30 AM
Cumulative hours during this event	2

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: 190 Mcf Recovered: 0 Mcf Lost: 190 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	[713731] Enterprise Crude Pipeline LLC
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	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 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, third-party pipeline operator, Enterprise, had an unplanned emergency shutdown of their downstream central station facility, due to a gas detection alarm, which then triggered an ESD alarm, prompting the immediate shutdown of their facility and their sales gas valve to close. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility and caused an unanticipated and unavoidable flaring event at Oxy's upstream facility. Until Enterprise's downstream facility was returned to normal working operations and was able to handle the volume of gas sent to them, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline or offload all its stranded gas to another downstream pipeline operator. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, or the ESD system or valve, and/or issues with their downstream facility for this event. Oxy personnel had to contact Enterprise directly when

	flaring started at its upstream facility to determine cause, as all Oxy's facility equipment were operating as designed prior to the flaring event occurring.
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, 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. In this case, third-party pipeline operator, Enterprise, had an unplanned emergency shutdown of their downstream central station facility, due to a gas detection alarm, which then triggered an ESD alarm, prompting the immediate shutdown of their facility and their sales gas valve to close. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility and caused an unanticipated and unavoidable flaring event at Oxy's upstream facility. Until Enterprise's downstream facility was returned to normal working operations and was able to handle the volume of gas sent to them, Oxy was forced to route its stranded gas to a flare, as it was not able to push all its gas into Enterprise's gas pipeline or offload all its stranded gas to another downstream pipeline operator. As soon as flaring alarms were received by field personnel, they began making adjustments to the facility's well optimizer to shut in several high GOR wells. All OXY operations and facility equipment were running at maximized optimization prior to the shutdown of Enterprise's downstream central station facility and their inability to take Oxy's volume of gas. 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.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline emergency shutdown, restriction or shut in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise 's downstream facility issues will re-occur from time to time, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route 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 during these circumstances. The limited actions that Oxy can do in this circumstance is to shut in multiple high GOR wells and engage in secondary third-party operator offload alternative routes, when possible, to minimize flaring volumes during this third-party pipeline operator downstream activity shutdown, restriction and/or shut in.

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ACKNOWLEDGMENTS

Action 233065

ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 233065
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☒	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.
☒	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 233065

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	Action Number: 233065
	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.	6/26/2023