

UPSET FLARE EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Mesa Verde 18 CTB**Flare Date:** 06/24/2023**Duration of event:** 21 Minutes**MCF Flared:** 90**Start Time:** 01:38 PM**End Time:** 01:59 PM**Cause:** Emergency Flare > Downstream Activity > Enlink > Rico Station> Equipment Issues > Emergency Shutdown**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, this was a sudden and reasonably unforeseeable incident outside of OXY's control, but which impacted OXY's upstream facility. Third-party pipeline operator, Enlink, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Rico station facility having equipment issues, which instigated a sudden and unexpected shutdown, which in turn prompted high sales line pressure to occur and triggered a flaring event to occur at the Mesa Verde 18 CTB. This flaring event occurred because of Enlink's inability to take Oxy's volume of gas and with no gas takeaway occurring, field psi increased until set psi levels were reached which triggered flaring at Oxy's facility, as a safety measure for operations, facility equipment, and personnel.

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. This facility is a manned site. 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 in order 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, this was a sudden and reasonably unforeseeable incident outside of OXY's control, but which impacted OXY's upstream facility. Third-party pipeline operator, Enlink, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Rico station facility having equipment issues, which instigated a sudden and unexpected shutdown, which in turn prompted high sales line pressure to occur and triggered a flaring event to occur at the Mesa Verde 18 CTB. This flaring event occurred because of Enlink's inability to take Oxy's volume of gas and with no gas takeaway occurring, field psi increased until set psi levels were reached which triggered flaring at Oxy's facility, as a safety measure for

operations, facility equipment, and personnel. The facility was manned by Oxy production techs, who immediately upon noticing flaring occurring, 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 Enlink 's downstream 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 the corrective actions to eliminate the cause and potential reoccurrence of an Enlink gas flow pipeline 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. Enlink '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 Enlink has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enlink then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into the Enlink 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 keep continually communicate with Enlink personnel regarding these types of situations and when possible, engage in emergency alternative compression reaction strategies.

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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Santa Fe, NM 87505

DEFINITIONS

Action 237682

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 237682
	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 237682

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 237682
	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	[fAPP2126659618] MESA VERDE 18 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	Emergency Flare > Downstream Activity > Enlink > Rico Station> Equipment Issues > Emergency Shutdown

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	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	3
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
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QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	06/24/2023
Time vent or flare was discovered or commenced	01:38 PM
Time vent or flare was terminated	01:59 PM
Cumulative hours during this event	0

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: 90 Mcf Recovered: 0 Mcf Lost: 90 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	[320009] ENLINK MIDSTREAM OPERATING, LP
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, this was a sudden and reasonably unforeseeable incident outside of OXY's control, but which impacted OXY's upstream facility. Third-party pipeline operator, Enlink, who owns and operates the gas pipeline, did not provide advance notice of the disruption to their gas pipeline operations due to their downstream Rico station facility having equipment issues, which instigated a sudden and unexpected shutdown, which in turn prompted high sales line pressure to occur and triggered a flaring event to occur at the Mesa Verde 18 CTB. This flaring event occurred because of Enlink's inability to take Oxy's volume of gas and with with no gas takeaway occurring, field psi increased until set psi levels were reached which triggered flaring at Oxy's facility, as a safety measure for operations, facility equipment, and personnel.
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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

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	Action Number: 237682
	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.	7/9/2023