



## Certificate of Analysis

Number: 6030-23030240-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Mar. 24, 2023

Field: PERMIAN\_RESOURCES  
Station Name: Silver CTB Train 2 Check (FMP)  
Station Number: 17322C  
Station Location: OP-L0906-BT001  
Sample Point: Meter  
Formation: NEW\_MEXICO  
County:  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge  
Sampling Company: : SPL

Sampled By: Raul Salazar  
Sample Of: Gas Spot  
Sample Date: 03/15/2023  
Sample Conditions: 90 psig, @ 81.7 °F Ambient: 82 °F  
Effective Date: 03/15/2023  
Method: GPA-2261M  
Cylinder No: 1111-002257  
Instrument: 70104251 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 03/20/2023 0:00 AM  
Analyzed: 03/22/2023 07:36:53 by EBH

## Analytical Data

| Components     | Un-normalized<br>Mol % | Mol. %    | Wt. %   | GPM at<br>14.65 psia |
|----------------|------------------------|-----------|---------|----------------------|
| Nitrogen       | 1.380                  | 1.40774   | 1.484   |                      |
| Carbon Dioxide | 2.772                  | 2.82680   | 4.680   |                      |
| Methane        | 68.132                 | 69.48661  | 41.939  |                      |
| Ethane         | 10.722                 | 10.93485  | 12.370  | 2.926                |
| Propane        | 5.686                  | 5.79914   | 9.621   | 1.598                |
| Iso-Butane     | 0.784                  | 0.79928   | 1.748   | 0.262                |
| n-Butane       | 1.904                  | 1.94165   | 4.246   | 0.612                |
| Iso-Pentane    | 0.535                  | 0.54564   | 1.481   | 0.200                |
| n-Pentane      | 0.730                  | 0.74431   | 2.020   | 0.270                |
| Hexanes        | 1.775                  | 1.80978   | 5.868   | 0.745                |
| Heptanes       | 2.627                  | 2.67953   | 10.101  | 1.237                |
| Octanes        | 0.933                  | 0.95185   | 4.091   | 0.488                |
| Nonanes Plus   | 0.071                  | 0.07282   | 0.351   | 0.041                |
|                | 98.051                 | 100.00000 | 100.000 | 8.379                |

## Calculated Physical Properties

|                             | Total  | C9+    |
|-----------------------------|--------|--------|
| Calculated Molecular Weight | 26.58  | 128.26 |
| Compressibility Factor      | 0.9939 |        |
| Relative Density Real Gas   | 0.9230 | 4.4283 |

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

|                                     |        |        |
|-------------------------------------|--------|--------|
| Real Gas Dry BTU                    | 1484.8 | 6974.4 |
| Water Sat. Gas Base BTU             | 1459.5 | 6852.4 |
| Ideal, Gross HV - Dry at 14.65 psia | 1475.7 | 6974.4 |
| Ideal, Gross HV - Wet               | 1449.9 | 6852.4 |

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:** Silver 33 CTB**Flare Date:** 07/17/2023**Duration of event:** 3 Hours 9 Minutes**MCF Flared:** 624**Start Time:** 09:27 AM**End Time:** 12:36 PM**Cause:** Emergency Flare > Third Party Downstream Activity > Enterprise > Mentone Plant & Central Station > Emergency Shutdowns**Method of Flared Gas Measurement:** Gas Flare Meter

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**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 or 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 downstream operator, had several events within a 24-hour period, which caused unplanned emergency shutdowns and resulted in their inability to take gas, which in turn caused high line pressure to occur, which then prompted the field to pressure up automatically and trigger three (3) flaring events to occur. First flaring event occurred due to Enterprise's primary plant in Mentone losing power suddenly, second flaring event occurred due to Enterprise's Central Station had a small fire and the third flaring event occurred due to Enterprise having had equipment issues. All three flaring instances were unplanned and caused by a third-party downstream operator. This event could not have been foreseen, avoided or prevented from happening as this event occurred with little to no advance notice or warning.

**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 downstream operator, had several events within a 24-hour period, which caused unplanned emergency shutdowns and resulted in their inability to take gas, which in turn caused high line pressure to occur, which then prompted the field to pressure up automatically and trigger three (3) flaring events to occur. First flaring event occurred due to Enterprise's primary plant in Mentone losing power suddenly, second flaring event occurred due to Enterprise's Central Station had a small fire and the third flaring event occurred due to Enterprise having had equipment issues. All three flaring instances were unplanned and caused by a third-party downstream operator. This event could not have been foreseen, avoided or prevented from happening as this event occurred with little to no advance notice or warning. As soon as flaring was triggered, during each

instance of reported flaring, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with ensuring field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area. In addition, several high GOR wells, across the Sand Dunes and Platinum routes, were shut-in to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the Platinum CTB, which took some time to do. 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 gas plants and/or associated downstream facility issues, as this is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise will have issues which may reoccur from time to time and may trigger a spike in the gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise's facilities and/or gas plants has equipment 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 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**  
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**District II**  
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**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 246888

DEFINITIONS

|  |   |
|--|---|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696   |
|  | Action Number:<br>246888                                      |
|  | Action Type:<br>[C-129] Amend Venting and/or Flaring (C-129A) |

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"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul> |
|--|

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QUESTIONS

Action 246888

**QUESTIONS**

|  |   |
|--|---|
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|  | Action Number:<br>246888                                      |
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**QUESTIONS**

|   |                             |
|---|-----------------------------|
| <b>Prerequisites</b>  |                             |
| 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 Operator   | [16696] OXY USA INC         |
| Incident Type   | Flare                       |
| Incident Status   | Closure Not Approved        |
| Incident Well   | Unavailable.                |
| Incident Facility   | [fAPP2126654549] SILVER CTB |
| Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application. |                             |

|  |   |
|--|---|
| <b>Determination of Reporting Requirements</b>   |   |
| 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, major 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 <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 within 300 feet from an occupied permanent residence, school, hospital, institution or church in existence  | No  |

|   |  |
|---|--|
| <b>Equipment Involved</b>                                 |  |
| Primary Equipment Involved                                | Other (Specify)  |
| Additional details for Equipment Involved. Please specify | Emergency Flare > Third Party Downstream Activity > Enterprise > Mentone Plant & Central Station > Emergency Shutdowns |

|   |               |
|---|---------------|
| <b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>  |               |
| Please provide the mole percent for the percentage questions in this group.   |               |
| Methane (CH4) percentage  | 69            |
| 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

Action 246888

**QUESTIONS (continued)**

|  |   |
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|  | Action Number:<br>246888                                      |
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**QUESTIONS**

| Date(s) and Time(s)                            |            |
|--|------------|
| Date vent or flare was discovered or commenced | 07/17/2023 |
| Time vent or flare was discovered or commenced | 09:27 AM   |
| Time vent or flare was terminated              | 12:36 PM   |
| Cumulative hours during this event             | 3          |

| 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: 624 Mcf   Recovered: 0 Mcf   Lost: 624 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 |  |
| 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   | <p>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 or complete shut-in of the gas pipeline by a third-party pipeline compressor 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 downstream operator, had several events within a 24-hour period, which caused unplanned emergency shutdowns and resulted in their inability to take gas, which in turn caused high line pressure to occur, which then prompted the field to pressure up automatically and trigger three (3) flaring events to occur. First flaring event occurred due to Enterprise's primary plant in Mentone losing power suddenly, second flaring event occurred due to Enterprise's Central Station had a small fire and the third flaring event occurred due to Enterprise having had equipment issues. All three flaring instances were unplanned and caused by a third-party downstream operator. This event could not have been foreseen, avoided or prevented from happening as this event occurred with little to no advance notice or warning.</p> <p>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</p> |

|   |  |
|---|--|
| Steps taken to limit the duration and magnitude of vent or flare                  | 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 downstream operator, had several events within a 24-hour period, which caused unplanned emergency shutdowns and resulted in their inability to take gas, which in turn caused high line pressure to occur, which then prompted the field to pressure up automatically and trigger three (3) flaring events to occur. First flaring event occurred due to Enterprise's primary plant in Mentone losing power suddenly, second flaring event occurred due to Enterprise's Central Station had a small fire and the third flaring event occurred due to Enterprise having had equipment issues. All three flaring instances were unplanned and caused by a third-party downstream operator. This event could not have been foreseen, avoided or prevented from happening as this event occurred with little to no advance notice or warning. As soon as flaring was triggered, during each instance of reported flaring, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with ensuring field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area. In addition, several high GOR wells, across the Sand Dunes and Platinum routes, were shut-in to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the Platinum CTB, which took some time to do. 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 gas plants and/or associated downstream facility issues, as this is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise will have issues which may reoccur from time to time and may trigger a spike in the gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise's facilities and/or gas plants has equipment 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 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

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.  |
| <input checked="" type="checkbox"/> | I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.   |
| <input checked="" type="checkbox"/> | I hereby certify the statements in this amending 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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CONDITIONS

| Created By | Condition  | Condition Date |
|------------|--|----------------|
| marialuna2 | If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event. | 8/1/2023       |