

## **Volumetrics Inc.**

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

**Work Order** Company: OXY USA INC 4000501489 Field/Location: **NMSW** Sampled by: OXY/JE SPOT-CYLINDER

Station Name: CORRAL COMPRESSOR STA 2 SOUTH FUEL SKID OUTLE Sample Type:

Sample Temperature (F): Station Number: NA Sample Pressure (PSIG): Sample Date: 2/23/22 1:30 PM 125 **Analysis Date:** 3/7/22 11:00 AM Flow rate (MCF/Day): NA Instrument: INFICON Ambient Temperature (F): 23

Sampling method: Calibration/Verification Date: 3/7/2022 FILL & EMPTY

Cylinder Number: Heat Trace used: YES 27784

## **NATURAL GAS ANALYSIS: GPA 2261**

Components	Un-Normalized Mol%	Normalized Mol%	GPM 14.650	GPM 14.730	GPM 15.025
Hydrogen Sulfide	0.0000	0.0000			
Nitrogen	1.3240	1.3598			
Methane	75.6525	77.7008			
Carbon Dioxide	0.1877	0.1928			
Ethane	11.5036	11.8151	3.153	3.170	3.234
Propane	5.8586	6.0172	1.654	1.663	1.696
Isobutane	0.7572	0.7777	0.254	0.255	0.260
N-butane	1.6243	1.6683	0.525	0.528	0.538
Isopentane	0.2101	0.2158	0.079	0.079	0.081
N-Pentane	0.1809	0.1858	0.067	0.068	0.069
Hexanes Plus	0.0650	0.0667	0.029	0.029	0.030
Total	97.3638	100.0000			

Hexanes plus split (60%-30%-10%)

Physical Properties (Calculated)	14.650 psia	14.730 psia	15.025 psia
Total GPM Ethane+	5.761	5.792	5.908
Total GPM Iso-Pentane+	0.175	0.176	0.179
Compressibility (Z)	0.9965	0.9965	0.9964
Specific Gravity ( Air=1) @ 60 °F	0.7242	0.7242	0.7243
Molecular Weight	20.911	20.911	20.911
Gross Heating Value	14.650 psia	14.730 psia	15.025 psia
Dry, Real (BTU/Ft <sup>3</sup> )	1244.9	1251.8	1276.9
Wet, Real (BTU/Ft <sup>3</sup> )	1223.3	1230.0	1270.9
			_
Dry, Ideal (BTU/Ft <sup>3</sup> )	1240.6	1247.4	1272.3
Wet, Ideal (BTU/Ft <sup>3</sup> )	1219.0	1225.7	1250.2

Temperature base 60 °F

Comment: FIELD H2S = 0 PPM

Verified by

Mostaq Ahammad Petroleum Chemist Approved by

Deann Friend Laboratory Manager

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

Facility: Corral 2S Flare Date: 12/17/2023

**Duration of Event:** 5 Hours 5 Minutes **MCF Flared:** 1281

Start Time: 12:45 AM End Time: 05:50 AM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise > ESD Valve and Equipment Issues

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 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 operated downstream pipeline operator, had continuing ESD valve issues which kept continuously opening and closing, along with other equipment issues, which in turn caused multiple sudden and unexpected shut ins and/or reductions of gas intake, within a 24-hr period, which then prompted high line pressure to occur in every instance, which then triggered intermittent flaring events to occur. Oxy makes every attempt to communicate with Enterprise personnel and on this day, there was little to no communication regarding their issues, which heavily affected Oxy's ability to prevent flaring. Oxy is unable to predict or anticipate when Enterprise will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done. This event could not have been foreseen, avoided or prevented from happening as it occurred with 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 operated downstream pipeline operator, had continuing ESD valve issues which kept continuously opening and closing, along with other equipment issues, which in turn caused multiple sudden and unexpected shut ins and/or reductions of gas intake, within a 24-hr period, which then prompted high line pressure to occur in every instance, which then triggered intermittent flaring events to occur. Oxy makes every attempt to communicate with Enterprise personnel and on this day, there was little to no communication regarding their issues, which heavily affected Oxy's ability to prevent flaring. Oxy is unable to predict or anticipate when Enterprise will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done during each occurrence. As soon as flaring was triggered, several wells were manually shut in and field area's mitigation optimizers cut injection rates to wells to reduce injection and sales gas across the area so that field pressure would stay below the flare trigger setpoints of the facility to cease

flaring, during each instance of Enterprise's continuing operational and equipment issues. 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 equipment or operational 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, which then prompts Oxy to route all its stranded gas not pushed into Enterprise 's gas pipeline, to flare. The only actions that Oxy can take and handle that is within its control, is to continually attempt to communicate with Enterprise personnel, who operate the sales gas pipeline, when possible, during these types of circumstances.

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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

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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 298646

### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	298646
	Action Type:
	[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:

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

QUESTIONS

Action 298646

Q	UESTIONS		
Operator:		OGRID:	
OXY USA INC P.O. Box 4294		16696 Action Number:	
Houston, TX 772104294		298646	
		Action Type: [C-129] Amend Venting and/or Flaring (C-129A)	
QUESTIONS			
Prerequisites			
Any messages presented in this section, will prevent submission of this application. Please resolve	these issues before conti	nuing with the rest of the questions.	
Incident ID (n#)	Unavailable.		
Incident Name	Unavailable.		
Incident Type	Flare		
Incident Status	Unavailable.		
Incident Facility	[fAPP2126640958]	CORRAL #2 SOUTH COMP STATION	
Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section	I on) that are assigned to y	our current operator can be amended with this C-129A application.	
Determination of Reporting Requirements			
Answer all questions that apply. The Reason(s) statements are calculated based on your answers at Was this vent or flare caused by an emergency or malfunction	Yes	guidance.	
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 v	enting 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	No		
watercourse, or otherwise, with reasonable probability, endanger public health, the environment or fresh water			
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 > Issues	Third Party Downstream Activity > Enterprise > ESD Valve and Equipment	
Representative Compositional Analysis of Vented or Flared Natural Gas			
Please provide the mole percent for the percentage questions in this group.	T 70		
Methane (CH4) percentage 78			
Nitrogen (N2) percentage, if greater than one percent	1		
Hydrogen Sulfide (H2S) PPM, rounded up	0		
Carbon Dioxide (C02) percentage, if greater than one percent	0		
Oxygen (02) percentage, if greater than one percent	en (02) percentage, if greater than one percent 0		
If you are venting and/or flaring because of Pipeline Specification, please provide the required spec	ifications for each gas.		
Methane (CH4) percentage quality requirement	Not answered.		
Nitrogen (N2) percentage quality requirement	Not answered.		
Hydrogen Sufide (H2S) PPM quality requirement Not answer		Not answered.	
Carbon Dioxide (C02) percentage quality requirement  Not answ			

Not answered.

Oxygen (02) percentage quality requirement

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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**

QUESTIONS, Page 2

Action 298646

QUESTIONS (continued)	

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	298646
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

#### QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/17/2023
Time vent or flare was discovered or commenced	12:45 AM
Time vent or flare was terminated	05:50 AM
Cumulative hours during this event	5

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: 1,281 Mcf   Recovered: 0 Mcf   Lost: 1,281 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	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 operated downstream pipeline operator, had continuing ESD valve issues which kept continuously opening and closing, along with other equipment issues, which in turn caused multiple sudden and unexpected shut ins and/or reductions of gas intake, within a 24-hr period, which then prompted high line pressure to occur in every instance, which then triggered intermittent flaring events to occur. Oxy makes every attempt to communicate with Enterprise personnel and on this day, there was little to no communication regarding their issues, which heavily affected Oxy's ability to prevent flaring. Oxy is unable to predict or anticipate when Enterprise will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done. This event could not have been foreseen, avoided or prevented from happening as it occurred with no advance notice or warning.
	It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable

Steps taken to limit the duration and magnitude of vent or flare	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 operated downstream pipeline operator, had continuing ESD valve issues which kept continuously opening and closing, along with other equipment issues, which in turn caused multiple sudden and unexpected shut ins and/or reductions of gas intake, within a 24-hr period, which then prompted high line pressure to occur in every instance, which then triggered intermittent flaring events to occur. Oxy makes every attempt to communicate with Enterprise personnel and on this day, there was little to no communication regarding their issues, which heavily affected Oxy's ability to prevent flaring. Oxy is unable to predict or anticipate when Enterprise will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done during each occurrence. As soon as flaring was triggered, several wells were manually shut in and field area's mitigation optimizers cut injection rates to wells to reduce injection and sales gas across the area so that field pressure would stay below the flare trigger setpoints of the facility to cease flaring, during each instance of Enterprise's continuing operational and equipment issues. 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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Houston, TX 772104294	298646
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

## **ACKNOWLEDGMENTS**

V	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.
V	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.
V	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.
V	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.
V	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 298646

## **CONDITIONS**

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	[C-129] Amend Venting and/or Flaring (C-129A)

## 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.	1/1/2024