Volumetrics Inc.
3710 East Rio Grande St, Victoria, TX-77901
Phone: 361-827-4024

Company:	OXY USA INC	**Work Order:**	4000414876
Field/Location :	NMSW	**Sampled by:**	VOLUMETRICS/RA
Station Name :	SALT FLAT CTB TRAIN 4 CHECK (FMP)	**Sample Type :**	SPOT-CYLINDER
Station Number :	18724C	**Sample Temperature (F):**	85.1
Sample Date:	12/3/21 11:05 AM	**Sample Pressure (PSIG):**	100.13
Analysis Date:	12/9/21 7:00 AM	**Flow rate (MCF/Day):**	17724.11
Instrument:	INFICON	**Ambient Temperature (F):**	70
Calibration/Verification Date:	12/9/2021	**Sampling method:**	FILL & EMPTY
Heat Trace used:	YES	**Cylinder Number:**	5029

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	1.4677	1.4784			
Methane	73.8072	74.3466			
Carbon Dioxide	0.1436	0.1447			
Ethane	12.6389	12.7313	3.399	3.418	3.486
Propane	6.4708	6.5181	1.793	1.803	1.839
Isobutane	0.8652	0.8715	0.285	0.286	0.292
N-butane	2.0848	2.1000	0.661	0.665	0.678
Isopentane	0.4715	0.4750	0.173	0.174	0.178
N-Pentane	0.5141	0.5178	0.187	0.188	0.192
Hexanes(C6's)	0.3317	0.3341	0.137	0.138	0.141
Heptanes (C7's)	0.3063	0.3086	0.142	0.143	0.146
Octanes (C8's)	0.1389	0.1399	0.072	0.072	0.073
Nonanes Plus (C9+)	0.0337	0.0340	0.019	0.019	0.020
Total	**99.2746**	**100.0000**			

Physical Properties (Calculated)	**14.650 psia**	**14.730 psia**	**15.025 psia**
Total GPM Ethane+	6.868	6.906	7.044
Total GPM Iso-Pentane+	0.730	0.734	0.749
Compressibility (Z)	0.9959	0.9959	0.9958
Specific Gravity (Air=1) @ 60 °F	0.7746	0.7746	0.7747
Molecular Weight	22.351	22.351	22.351

Gross Heating Value	**14.650 psia**	**14.730 psia**	**15.025 psia**
Dry, Real (BTU/Ft^3)	1322.1	1329.3	1356.1
Wet, Real (BTU/Ft^3)	1299.0	1306.1	1332.3
Dry, Ideal (BTU/Ft^3)	1316.7	1323.9	1350.4
Wet, Ideal (BTU/Ft^3)	1293.6	1300.7	1326.7

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: Salt Flat CTB **Flare Date:** 12/26/2023

Duration of Event: 2 Hours 25 Minutes **MCF Flared:** 348

Start Time: 07:45 AM **End Time:** 10:10 AM

Cause: Emergency Flare > Compression Equipment Malfunctions > Salt Flat CS > Freeze Discharge Line

Method of Flared Gas Measurement: Gas Flare Meter

1. Reason why this event was beyond Operator's control:

This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, the compression equipment at Oxy's Salt Flats compression station, had several gas compressors shut down on their end due to a freeze in their discharge line, which caused ice plugs to form several times, due to extreme weather conditions, which then prompted sudden and unexpected high field pressure to occur, which in turn, prompted Oxy's Salt Flats CTB to pressure up automatically and trigger intermittent flaring events to occur, within a 24-hour period. 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 that the Salt Flat compression station would have ice plugs forming in their discharge line as OXY takes every precaution to winterize, trace and insulate their facility equipment to prevent freezing in sections of equipment where liquid flows. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.

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, the compression equipment at Oxy's Salt Flats compression station, had several gas compressors shut down on their end due to a freeze in their discharge line, which caused ice plugs to form several times, due to extreme weather conditions, which then prompted sudden and unexpected high field pressure to occur, which in turn, prompted Oxy's Salt Flats CTB to pressure up automatically and trigger a flaring event to occur. As soon as flaring occurred, the facility's well optimizer adjusted injection rates and field personnel manually shut-in wells so that field pressure would stay below the flare trigger setpoints of the facility to cease flaring. 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 that the Salt Flat compression station would have ice plugs forming in their discharge line as OXY takes every precaution to winterize, trace and insulate their facility equipment to prevent freezing in sections of equipment where liquid flows. This event is out of OXY's control. 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 limited in the corrective actions to eliminate this type of cause and potential reoccurrence of flaring as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate all its facility locations equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. This flaring event was unforeseeable and unanticipated as this was an extreme cold/freezing weather related incident causing ice plugs to form in the discharge line at the Salt Flats compression station, which in turn, increased field pressure, triggering flaring to occur. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to continue with its compression equipment preventative maintenance program for all its facilities and continually work with its compression rental owners to resolve those issues in a timely manner, should they continue to occur suddenly and without warning.

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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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 302384
	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 302384

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 302384
	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	**[fAPP2126563666] SALT FLAT CTB**

Determination of Reporting Requirements	
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional 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 > Compression Equipment Malfunctions > Salt Flat CS > Freeze Discharge Line

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	74
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	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 (02) percentage quality requirement	*Not answered.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 302384
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/26/2023
Time vent or flare was discovered or commenced	07:45 AM
Time vent or flare was terminated	10:10 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: 348 Mcf | Recovered: 0 Mcf | Lost: 348 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	No
Was notification of downstream activity received by this operator	*Not answered.*
Downstream OGRID that should have notified this operator	*Not answered.*
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	This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, the compression equipment at Oxy's Salt Flats compression station, had several gas compressors shut down on their end due to a freeze in their discharge line, which caused ice plugs to form several times, due to extreme weather conditions, which then prompted sudden and unexpected high field pressure to occur, which in turn, prompted Oxy's Salt Flats CTB to pressure up automatically and trigger intermittent flaring events to occur, within a 24-hour period. 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 that the Salt Flat compression station would have ice plugs forming in their discharge line as OXY takes every precaution to winterize, trace and insulate their facility equipment to prevent freezing in sections of equipment where liquid flows. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible.
	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

Steps taken to limit the duration and magnitude of vent or flare	and magnitude of flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. In this case, the compression equipment at Oxy's Salt Flats compression station, had several gas compressors shut down on their end due to a freeze in their discharge line, which caused ice plugs to form several times, due to extreme weather conditions, which then prompted sudden and unexpected high field pressure to occur, which in turn, prompted Oxy's Salt Flats CTB to pressure up automatically and trigger a flaring event to occur. As soon as flaring occurred, the facility's well optimizer adjusted injection rates and field personnel manually shut-in wells so that field pressure would stay below the flare trigger setpoints of the facility to cease flaring. 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 that the Salt Flat compression station would have ice plugs forming in their discharge line as OXY takes every precaution to winterize, trace and insulate their facility equipment to prevent freezing in sections of equipment where liquid flows. This event is out of OXY's control. 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 limited in the corrective actions to eliminate this type of cause and potential reoccurrence of flaring as notwithstanding proper gas compressor design and operation, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause compressor unit malfunctions to occur without warning or advance notice. Oxy continually strives to maintain and operate all its facility locations equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. This flaring event was unforeseeable and unanticipated as this was an extreme cold/freezing weather related incident causing ice plugs to form in the discharge line at the Salt Flats compression station, which in turn, increased field pressure, triggering flaring to occur. Oxy has a strong and positive compression equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to continue with its compression equipment preventative maintenance program for all its facilities and continually work with its compression rental owners to resolve those issues in a timely manner, should they continue to occur suddenly and without warning.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 302384
	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 302384

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 302384
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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.	1/10/2024