

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Corral 2S CS**Flare Date:** 08/11/2024**Duration of Event:** 4 Hours 50 Minutes**MCF Flared:** 452**Start Time:** 08:00 AM**End Time:** 12:50 PM**Cause:** Emergency Flare > Downstream Activity > Enterprise > Process Intake Capacity Malfunctions**Method of Flared Gas Measurement:** Gas Flare Meter

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**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, there were continuing third party issues which were affecting Oxy's ability to push forward its gas, which resulted in a brief flaring event to occur. One of the third-party companies responsible for transporting our gas products is experiencing persistent significant logistical challenges. This has resulted in delays and bottlenecks, preventing the timely movement of our products to their intended destinations. The second third-party company, which manages storage facilities, is currently facing capacity constraints. Their inability to accommodate additional volumes of gas has created a backlog, further complicating the situation. These disruptions have led to an accumulation of excess gas at our facility. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring. This process allows us to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not our preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. We are actively working with the affected third-party companies to resolve these issues as quickly as possible and to minimize the environmental impact of flaring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively. The duration and volume of this flaring event is a combination of multiple intermittent flaring instances within a 24-hour period.

**2. Steps Taken to limit duration and magnitude of venting or flaring:**

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route its 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. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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, there were continuing third party issues which were affecting Oxy's ability to push forward

its gas, which resulted in a brief flaring event to occur. One of the third-party companies responsible for transporting our gas products is experiencing persistent significant logistical challenges. This has resulted in delays and bottlenecks, preventing the timely movement of our products to their intended destinations. The second third-party company, which manages storage facilities, is currently facing capacity constraints. Their inability to accommodate additional volumes of gas has created a backlog, further complicating the situation. These disruptions have led to an accumulation of excess gas at our facility. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring. This process allows us to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not Oxy's preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. As soon as flaring began, the well optimizer adjusted injection rates and shut in a couple of wells to minimize emissions and cease flaring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.

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

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise 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. Enterprise downstream facilities and associated facilities and/or secondary pipeline operators, such as ETC., may have operational 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 Enterprise or ETC has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise and/or ETC then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into their gas pipelines, 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 Enterprise and/or ETC personnel during these types of situations.


**AKM MEASUREMENT SERVICES,LLC. Natural Gas Analysis Report**  
 GPA 2172-09/API 14.5 Report with GPA 2145-16 Physical Properties

	Sample Information
Sample Name	CORRAL 2 SOUTH STATION INLET
Technician	ANTHONY DOMINGUEZ
Analyzer Make & Model	INFICON MICRO GC
Last Calibration/Validation Date	11-03-2023
Meter Number	NA
Air temperature	63
Flow Rate (MCF/Day)	
Heat Tracing	HEATED HOSE & GASIFIER
Sample description/mtr name	CORRAL 2 SOUTH STATION INLET
Sampling Method	FILL & EMPTY
Operator	OCCIDENTAL PETROLEUM, OXY USA INC
State	NEW MEXICO
Region Name	PERMIAN_RESOURCES
Asset	NEW MEXICO
System	RANCH
FLOC	OP-L2100-CS005
Sample Sub Type	COMP STATION
Sample Name Type	METER
Vendor	AKM MEASUREMENT
Cylinder #	38905
Sampled by	CHANDLER MONTGOMERY
Sample date	11-1-2023
Analyzed date	11-03-2023
Method Name	C9
Injection Date	2023-11-03 11:59:19
Report Date	2023-11-03 12:01:14
EZReporter Configuration File	1-16-2023 OXY GPA C9+ H2S #2.cfgx
Source Data File	661cfdda-b53d-4ae9-a028-b52f2b3db2d4
NGA Phys. Property Data Source	GPA Standard 2145-16 (FPS)
Data Source	INFICON Fusion Connector

**Component Results**

Component Name	Peak Area	Raw Amount	Response Factor	Norm Mole%	Gross HV (Dry) (BTU / Ideal cu.ft.)	Relative Gas Density (Dry)	GPM (Dry) (Gal. / 1000 cu.ft.)	
Nitrogen	16421.8	0.9478	0.00005772	0.9428	0.0	0.00912	0.104	
Methane	975051.0	71.3657	0.00007319	70.9859	718.6	0.39319	12.090	
CO2	2427.5	0.1159	0.00004774	0.1153	0.0	0.00175	0.020	
Ethane	291974.2	13.4774	0.00004616	13.4057	237.8	0.13918	3.602	
H2S	0.0	0.0000	0.00000000	0.0000	0.0	0.00000	0.000	
Propane	229342.5	7.5131	0.00003276	7.4731	188.5	0.11378	2.068	
iso-butane	104612.2	1.1718	0.00001120	1.1656	38.0	0.02339	0.383	
n-Butane	254085.4	2.8254	0.00001112	2.8104	91.9	0.05640	0.890	
iso-pentane	73025.7	0.7231	0.00000990	0.7193	28.8	0.01792	0.264	
n-Pentane	95662.5	0.9104	0.00000952	0.9055	36.4	0.02256	0.330	
hexanes	87528.0	0.8740	0.00000999	0.8693	41.4	0.02587	0.359	
heptanes	71956.0	0.4426	0.00000615	0.4403	24.3	0.01523	0.204	
octanes	28646.0	0.1573	0.00000549	0.1565	9.8	0.00617	0.081	
nonanes+	3123.0	0.0104	0.00000332	0.0103	0.7	0.00046	0.006	
Total:		100.5349		100.0000	1416.2	0.82501	20.401	

**Results Summary**

Result	Dry	Sat.	
Total Un-Normalized Mole%	100.5349		
Pressure Base (psia)	14.730		
Temperature Base (Deg. F)	60.00		
Flow to Impinger (scf)	0.0		

Result	Dry	Sat.	
Flowing Pressure (psia)	49.3		
Gross Heating Value (BTU / Ideal cu.ft.)	1416.2	1391.6	
Gross Heating Value (BTU / Real cu.ft.)	1423.2	1399.0	
Relative Density (G), Real	0.8287	0.8255	

Monitored Parameter Report

Parameter	Value	Lower Limit	Upper Limit	Status	
Total un-normalized amount	100.5349	97.0000	103.0000	Pass	

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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

DEFINITIONS

Action 386003

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 386003
	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: <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 386003

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 386003
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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 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) 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, 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

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Downstream Activity > Enterprise > Process Intake Capacity Malfunctions

<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	71
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	0
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	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sulfide (H2S) PPM quality requirement	0
Carbon Dioxide (CO2) percentage quality requirement	0
Oxygen (O2) percentage quality requirement	0



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QUESTIONS, Page 2

Action 386003

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:
	16696
	Action Number:
	386003
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	08/11/2024
Time vent or flare was discovered or commenced	08:00 AM
Time vent or flare was terminated	12:50 PM
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: 452 MCF   Recovered: 0 MCF   Lost: 452 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	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, there were continuing third party issues which were affecting Oxy's ability to push forward its gas, which resulted in a brief flaring event to occur. One of the third-party companies responsible for transporting our gas products is experiencing persistent significant logistical challenges. This has resulted in delays and bottlenecks, preventing the timely movement of our products to their intended destinations. The second third-party company, which manages storage facilities, is currently facing capacity constraints. Their inability to accommodate additional volumes of gas has created a backlog, further complicating the situation. These disruptions have led to an accumulation of excess gas at our facility. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring. This process allows us to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not our preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. We are actively working with the affected third-party companies to resolve these issues as quickly as possible and to



	minimize the environmental impact of flaring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively. The duratio
Steps taken to limit the duration and magnitude of vent or flare	<p>This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walkthroughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route its 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. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible 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, there were continuing third party issues which were affecting Oxy's ability to push forward its gas, which resulted in a brief flaring event to occur. One of the third-party companies responsible for transporting our gas products is experiencing persistent significant logistical challenges. This has resulted in delays and bottlenecks, preventing the timely movement of our products to their intended destinations. The second third-party company, which manages storage facilities, is currently facing capacity constraints. Their inability to accommodate additional volumes of gas has created a backlog, further complicating the situation. These disruptions have led to an accumulation of excess gas at our facility. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring</p>
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	<p>Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise 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. Enterprise downstream facilities and associated facilities and/or secondary pipeline operators, such as ETC., may have operational 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 Enterprise or ETC has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise and/or ETC then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas not pushed into their gas pipelines, 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 Enterprise and/or ETC personnel during these types of situations.</p>

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Action 386003

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

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  
  
Action 386003

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

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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.	9/23/2024