

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Salt Flats CTB**Flare Date:** 10/17/2023**Duration of Event:** 3 Hours**MCF Flared:** 76**Start Time:** 08:45 AM**End Time:** 11:45 AM**Cause:** Emergency Flare > Third Party Downstream Activity > San Mateo > 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, San Mateo, third party operated downstream pipeline operator, unexpectedly restricted their intake gas volume from Oxy due to equipment issues on their end, which in turn caused high line pressure to occur, several times within a 24-hr period, which then triggered brief intermittent flaring events to occur. These brief intermittent flaring instances could not have been foreseen, avoided or prevented from happening as they occurred with no advance notice or warning. The duration and volume of this event is a collective of all flaring instances within a 24-period.

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, San Mateo, third party operated downstream pipeline operator, unexpectedly restricted their intake gas volume from Oxy due to equipment issues on their end, which in turn caused high line pressure to occur, several times within a 24-hr period, which then triggered brief intermittent flaring events to occur. These brief intermittent flaring instances could not have been foreseen, avoided or prevented from happening as they occurred with no advance notice or warning. As soon as flaring was triggered, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and ensured field area's mitigation optimizers cut injection rates to wells in the field 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. 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 plant's 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. San Mateo 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 San Mateo has equipment issues or greatly struggles to handle the volume of gas being sent to them by Oxy, San Mateo then restricts Oxy's ability to send gas, which then prompts Oxy to route all its stranded gas not pushed into San Mateo's 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 San Mateo personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Salt Flat CTB**Flare Date:** 10/30/2024**Duration of Event:** 1 Hour 10 Minutes**MCF Flared:** 63**Start Time:** 08:20 PM**End Time:** 09:30 PM**Cause:** Emergency Flare > Third Party Downstream Activity > San Mateo> Plant 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 instance, San Mateo, a third-party operated downstream pipeline operator, unexpectedly restricted their gas flow intake from Oxy due to operational issues at their plant. This restriction resulted in elevated line pressure, which subsequently triggered a flaring event. This event could not have been foreseen, avoided, or prevented from happening as this event 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. In this instance, San Mateo Midstream, a third-party operated downstream pipeline operator, unexpectedly restricted their gas flow intake from Oxy due to operational issues at their plant. This restriction resulted in elevated line pressure, which subsequently triggered a flaring event. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning. As soon as flaring was triggered, 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 immediately to reduce injection and sales gas across the area. Flaring ceased once field pressure stayed below the flare trigger setpoints for the facility. 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 plant's 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. San Mateo Midstream 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. 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 operate the sales gas pipeline, when possible, during these types of circumstances.

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1220 S. St Francis Dr.
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DEFINITIONS

Action 401424

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 401424
	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 401424

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 401424
	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 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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

Equipment Involved	
Primary Equipment Involved	Not answered.
Additional details for Equipment Involved. Please specify	Emergency Flare > Third Party Downstream Activity > San Mateo> Plant Issues

Representative Compositional Analysis of Vented or Flared Natural Gas Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	75
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (C02) 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 Sufide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (C02) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

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QUESTIONS, Page 2

Action 401424

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	10/30/2024
Time vent or flare was discovered or commenced	08:20 PM
Time vent or flare was terminated	09:30 PM
Cumulative hours during this event	1

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: 63 Mcf Recovered: 0 Mcf Lost: 63 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	[329461] San Mateo Black River Oil Pipeline, LLC
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 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 instance, San Mateo, a third-party operated downstream pipeline operator, unexpectedly restricted their gas flow intake from Oxy due to operational issues at their plant. This restriction resulted in elevated line pressure, which subsequently triggered a flaring event. This event could not have been foreseen, avoided, or prevented from happening as this event 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 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. In this instance, San Mateo Midstream, a third-party operated downstream pipeline operator, unexpectedly restricted their gas flow intake from Oxy due to operational issues at their plant. This restriction resulted in elevated line pressure, which

Steps taken to limit the duration and magnitude of vent or flare	subsequently triggered a flaring event. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning. As soon as flaring was triggered, 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 immediately to reduce injection and sales gas across the area. Flaring ceased once field pressure stayed below the flare trigger setpoints for the facility. 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 plant's 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. San Mateo Midstream 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. 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 operate the sales gas pipeline, when possible, during these types of circumstances.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	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.
☒	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 401424

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	Action Number: 401424
	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.	11/11/2024