

UPSET FLARING EVENT JUSTIFICATIONS FORM

Facility Id# fAPP2126640958 Operator: OXY USA, Inc.

Facility: Corral 2S CS Flare Date: 05/24/2025

Duration of Event: 9 Hours 35 Minutes **MCF Flared:** 57

Start Time: 01:45 PM End Time: 11:20 PM

Cause: Emergency Flare > Multiple Compression Equipment Issues

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, there was a sudden and simultaneous unexpected compression equipment malfunction, which in turn, then prompted high field pressure to occur, which then triggered a flaring event to occur. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible. Event duration and volume is a combined total of all flaring occurrences in a 24-hour 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, there was a sudden and simultaneous unexpected compression equipment malfunction, which in turn, then prompted high field pressure to occur, which then triggered a flaring event to occur. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. 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. Compressor engines are designed to operate in a precise manner and when malfunctions occur, it disrupts the compression unit's operating manner and robs the compression engine of power, thus, causing an automatic shutdown of the unit. 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 limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of compressor malfunctions as notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur, thereby, triggering the unit's sensors to automatically shut down the unit to avoid catastrophic damage to the internal engine components. Oxy continually strives to maintain and operate all its equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place.

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

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

DEFINITIONS

Action 471826

DEFINITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	471826
	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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QUESTIONS

Action 471826

	QUESTIONS	
Operator:		GRID:
OXY USA INC	_	16696
P.O. Box 4294 Houston, TX 772104294	A	ction Number: 471826
Houston, TX 772104204	A	ction Type:
		[C-129] Amend Venting and/or Flaring (C-129A)
QUESTIONS		
Prerequisites	a thana ingyan hafara aantinyii	as with the rest of the suppliers
Any messages presented in this section, will prevent submission of this application. Please resolve Incident ID (n#)	Unavailable.	ig with the rest of the questions.
	onavanasie.	
Incident Name	Unavailable.	
Incident Type	Flare	
Incident Status	Unavailable.	
Incident Facility	[fAPP2126640958] CO	RRAL #2 SOUTH COMP STATION
Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details sec	tion) that are assigned to your	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	and may provide addional quid	lance.
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	Yes	
Is this considered a submission for a vent or flare event	Yes, minor venting an	d/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 o	r may be a maior 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	<u> </u>
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	T	
Primary Equipment Involved	Other (Specify)	
Additional details for Equipment Involved. Please specify	Emergency Flare > Mo	ultiple Compression Equipment 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	1	
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	
Oxygen (02) percentage, it greater than one percent		
If you are venting and/or flaring because of Pipeline Specification, please provide the required specification.	ecifications for each gas.	
Methane (CH4) percentage quality requirement	0	
Nitrogen (N2) percentage quality requirement	0	
Hydrogen Sufide (H2S) PPM quality requirement	0	

0

0

Oxygen (02) percentage quality requirement

Carbon Dioxide (C02) percentage quality requirement

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QUESTIONS, Page 2

Action 471826

QUESTI	ONS (continued)	
Operator:	OGRID:	
OXY USA INC P.O. Box 4294	16696	
Houston, TX 772104294	Action Number: 471826	
1,000,001,000,000	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	05/24/2025	
Time vent or flare was discovered or commenced	01:45 PM	
Time vent or flare was terminated	11:20 PM	
Cumulative hours during this event	10	
Measured or Estimated Volume of Vented or Flared Natural Gas		
imeasured of Estimated volume of vented of Flared Natural Gas	I	
Natural Gas Vented (Mcf) Details	Not answered.	
Natural Gas Flared (Mcf) Details	Cause: Other Other (Specify) Natural Gas Flared Released: 57 MCF Recovered: 0 MCF Lost: 57 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	T	
Was this vent or flare a result of downstream activity	No	
Was notification of downstream activity received by this operator	No	
Downstream OGRID that should have notified this operator	0	
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 was a sudden and simultaneous unexpected compression equipment malfunction, which in turn, then prompted high field pressure to occur, which then triggered a flaring event to occur. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible. Event	

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ACKNOWLEDGMENTS

$\overline{\lor}$	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

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

CONDITIONS

Created By		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.	6/8/2025