

## Certificate of Analysis

Number: 6030-25010237-001A

Artesia Laboratory 200 E Main St. Artesia, NM 88210 Phone 575-746-3481

Chandler Montgomery Occidental Petroleum 1502 W Commerce Dr. Carlsbad, NM 88220

Field: PERMIAN\_RESOURCES
Station Name: Sand Dunes CTB Check

Station Number: 17000C

Station Location: OP-L0901-BT002

Sample Point: Meter

Property ID: FMP/LSE NM40659 Formation: NEW\_MEXICO

County:

Well Name: CTB

Type of Sample: : Spot-Cylinder Sampling Company: :SPL - OXY

Heat Trace Used: N/A

Last Inst. Cal.: 01/13/2025 08:04:58

Analyzed: 01/15/2025 11:37:09 by CDW

Report Date: 01/19/2025

Sampled By: CG
Sample Of: Gas
Sample Type: Spot

Sample Conditions: 125 psig, @ 62 °F Ambient: 43 °F

Sample Date: 01/13/2025 01:45
Received Date: 01/14/2025
Login Date: 01/14/2025

Effective Date: 01/01/2025
Flow Rate: 34819 MSCFD
Sampling Method: Purge/Fill Vacuum

Heating Method:

Method: GPA-2261M Cylinder No: 9999-005126

Instrument: 70142339 (Inficon GC-MicroFusion)

## **Analytical Data**

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide Nitrogen Methane Carbon Dioxide Ethane Propane Iso-butane n-Butane Iso-pentane n-Pentane Hexanes Plus	0.0000 1.2226 75.4281 0.6516 12.3989 6.3610 0.9604 2.2123 0.5013 0.5305 0.6584	0.0000 1.2114 74.7368 0.6456 12.2852 6.3027 0.9516 2.1920 0.4967 0.5256 0.6524	0.0000 1.5246 53.8641 1.2764 16.5957 12.4858 2.4848 5.7237 1.6100 1.7036 2.7313	3.280 1.733 0.311 0.690 0.181 0.190 0.284 6.669	GPM TOTAL C2+ GPM TOTAL C3+ GPM TOTAL iC5+	6.669 3.389 0.655
Calculated Physical Relative Density Real Calculated Molecular Compressibility Facto GPA 2172 Calculatio Calculated Gross B1 Real Gas Dry BTU Water Sat. Gas Base Ideal, Gross HV - Dry Ideal, Gross HV - Wet Net BTU Dry Gas - re Net BTU Wet Gas - re Comments: H2S Fie	Properties Gas Weight r on: TU per ft³ @ 14.65 p BTU at 14.65 psia t al gas eal gas	To 0.7' 22 0.99 sia & 60°F 13 130 128	otal 714 2.26 960 309 287 3.6	5113 5024 5113.2 5023.7		

Mostag Shamana

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.



## **UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**

Facility Id# fAPP2127048458 Operator: OXY USA, Inc.

Facility: Sand Dunes South Corridor CTB Vent Date: 05/03/2025

**Duration of Event:** 9 Hours 30 Minutes **MCF Vented:** 161

Start Time: 07:00 AM End Time: 04:30 PM

Cause: Well Intervention > Nitrogen Kill Truck > Unloading Well > Patton MDP1 17 Federal #173H

Method of Vented Gas Measurement: Allocated Calculation

## 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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on May 17, 2025, which documented the venting event. After reviewing multiple data sources, it has been confirmed that venting occurred exclusively on May 17, 2025. On this day, a field crew performed a well intervention on the Patton MDP1 17 Federal 173H to unload the well using a nitrogen kill truck, which required considerable time to complete. The use of a nitrogen kill truck was essential in this procedure to safely unload the well and ensure the protection of Oxy's personnel, operations, and equipment. This event is out of OXY's control yet 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:

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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on May 17, 2025, which documented the venting event. After careful research and reviewing multiple data sources, it has been confirmed that venting occurred exclusively on May 17, 2025. On this day, a field crew performed a well intervention on the Patton MDP1 17 Federal 173H to unload the well using a nitrogen kill truck, which required considerable time to complete. The use of a nitrogen kill truck was essential in this procedure to safely unload the well and ensure the protection of Oxy's personnel, operations, and equipment. 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 its corrective measures to address the root cause and prevent future incidents related to the unloading of a well, as venting occurrences are an inherent part of the well unloading process.

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

General Information Phone: (505) 629-6116

Online Phone Directory <a href="https://www.emnrd.nm.gov/ocd/contact-us">https://www.emnrd.nm.gov/ocd/contact-us</a>

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

DEFINITIONS

Action 475789

### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	475789
	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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 475789

Q	UESTIONS	
Operator:		OGRID:
OXY USA INC P.O. Box 4294		16696 Action Number:
Houston, TX 772104294		475789
		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 t	these issues before continuing wit	h the rest of the questions.
Incident Well	Unavailable.	
Incident Facility	[fAPP2127048458] Sand D	unes South Corridor CTB
Determination of Reporting Requirements		
Answer all questions that apply. The Reason(s) statements are calculated based on your answers are		
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 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 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	1	
Primary Equipment Involved	Other (Specify)	
Additional details for Equipment Involved. Please specify	Well Intervention > Nitroger	n Kill Truck > Unloading Well > Patton MDP1 17 Federal #173H
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	1	
Hydrogen Sulfide (H2S) PPM, rounded up	0	
Carbon Dioxide (C02) percentage, if greater than one percent	1	
Oxygen (02) percentage, if greater than one percent	0	
exigen (e_) percentage, it greates than one percent	ľ	
If you are venting and/or flaring because of Pipeline Specification, please provide the required spec		
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.	

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 475789

Santa	Fe, NM 87505
QUEST	IONS (continued)
Operator: OXY USA INC	OGRID: 16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	475789
	Action Type:  [C-129] Venting and/or Flaring (C-129)
QUESTIONS	
Date(s) and Time(s)	
Date vent or flare was discovered or commenced	05/03/2025
Time vent or flare was discovered or commenced	07:00 AM
Time vent or flare was terminated	04:30 PM
Cumulative hours during this event	10
	<u></u>
Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Vented   Released: 161 Mcf   Recovered: 0 Mcf   Lost: 161 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Allocated Calculation
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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on May 17, 2025, which documented the venting event. After reviewing multiple data sources, it has been confirmed that venting occurred exclusively on May 17, 2025. On this day, a field crew performed a well intervention on the Patton MDP1 17 Federal 173H to unload the well using a nitrogen kill truck, which required considerable time to complete. The use of a nitrogen kill truck was essential in this procedure to safely unload the well and ensure the protection of Oxy's personnel, operations, and equipment. This event is out of OXY's control

yet OXY made every effort to control and minimize emissions as much as possible.

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 adheres to

Steps taken to limit the duration and magnitude of vent or flare	reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on May 17, 2025, which documented the venting event. After careful research and reviewing multiple data sources, it has been confirmed that venting occurred exclusively on May 17, 2025. On this day, a field crew performed a well intervention on the Patton MDP1 17 Federal 173H to unload the well using a nitrogen kill truck, which required considerable time to complete. The use of a nitrogen kill truck was essential in this procedure to safely unload the well and ensure the protection of Oxy's personnel, operations, and equipment. 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 limited in its corrective measures to address the root cause and prevent future incidents related to the unloading of a well, as venting occurrences are an inherent part of the well unloading process.

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ACKNOWLEDGMENTS

Action 475789

## **ACKNOWLEDGMENTS**

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

## ACKNOWLEDGMENTS

V	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 <b>a complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
V	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.
V	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.
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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Action 475789

### **CONDITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	475789
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

### CONDITIONS

Created By		Condition Date
marialuna2	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.	6/17/2025