



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	Report Date:	01/19/2025
Station Name:	Sand Dunes CTB Check	Sampled By:	CG
Station Number:	17000C	Sample Of:	Gas
Station Location:	OP-L0901-BT002	Sample Type:	Spot
Sample Point:	Meter	Sample Conditions:	125 psig, @ 62 °F Ambient: 43 °F
Property ID:	FMP/LSE NM40659	Sample Date:	01/13/2025 01:45
Formation:	NEW_MEXICO	Received Date:	01/14/2025
County:		Login Date:	01/14/2025
Well Name:	CTB	Effective Date:	01/01/2025
Type of Sample :	Spot-Cylinder	Flow Rate:	34819 MSCFD
Sampling Company:	SPL - OXY	Sampling Method:	Purge/Fill Vacuum
Heat Trace Used:	N/A	Heating Method:	
Last Inst. Cal.:	01/13/2025 08:04:58	Method:	GPA-2261M
Analyzed:	01/15/2025 11:37:09 by CDW	Cylinder No.:	9999-005126
		Instrument:	70142339 (Inficon GC-MicroFusion)

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	0.0000	0.0000	0.0000		GPM TOTAL C2+ 6.669
Nitrogen	1.2226	1.2114	1.5246		GPM TOTAL C3+ 3.389
Methane	75.4281	74.7368	53.8641		GPM TOTAL iC5+ 0.655
Carbon Dioxide	0.6516	0.6456	1.2764		
Ethane	12.3989	12.2852	16.5957	3.280	
Propane	6.3610	6.3027	12.4858	1.733	
Iso-butane	0.9604	0.9516	2.4848	0.311	
n-Butane	2.2123	2.1920	5.7237	0.690	
Iso-pentane	0.5013	0.4967	1.6100	0.181	
n-Pentane	0.5305	0.5256	1.7036	0.190	
Hexanes Plus	0.6584	0.6524	2.7313	0.284	
	100.9251	100.0000	100.0000	6.669	

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7714	3.2176
Calculated Molecular Weight	22.26	93.19
Compressibility Factor	0.9960	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1309	5113
Water Sat. Gas Base BTU	1287	5024
Ideal, Gross HV - Dry at 14.65 psia	1303.6	5113.2
Ideal, Gross HV - Wet	1280.8	5023.7
Net BTU Dry Gas - real gas	1189	
Net BTU Wet Gas - real gas	1169	

Comments: H2S Field Content: 0 %

Mostaq Ahamed

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 FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility Id# fAPP2127048458

Operator: OXY USA, Inc.

Facility: Sand Dunes South Corridor CTB

Flare Date: 01/12/2026

Duration of Event: 21 Minutes

MCF Flared: 533

Start Time: 06:55 AM

End Time: 07:16 AM

Cause: Emergency Flare > Weather Related > Frozen Air Supply Line > Flare Valve

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 OXY'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 employs rigorous and effective winter facility operation practices, placing significant emphasis on thorough planning and execution of equipment winterization. Critical supply and connection lines and valves are insulated, wind walls are installed as needed, and heat tracing systems are utilized to maintain required operational temperatures. Additionally, OXY Operations teams ensure that piping and valves are wrapped with insulation blankets or covers. In this case, due to extreme freezing weather conditions, the air supply line to Sand Dunes South Corridor CTB flare valve froze, which caused the flare valve to remain in the open position. When an air supply line freezes, it traps pressure behind a frozen blockage in the air supply line and keeps a flare valve open. This prevents the "close" signal from reaching the actuator of the flare valve to actually close, so it remains stuck in the open position until the frozen blockage is removed or thawed. This event could not have been foreseen, avoided, or prevented as this event occurred with no advance notice or warning. OXY made every effort to control and minimize emissions as much as possible during this event. The occurrence of this event was beyond OXY's control. 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. OXY took all possible measures to manage and reduce emissions to the greatest extent.

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 98% combustion efficiency to lessen emissions as much as possible. Internal OXY procedures ensure that upon notification of a flare triggered, production technicians are dispatched and instructed to assess the issue as soon as possible in order to take prompt corrective action to resolve the issue. OXY production technicians are required to evaluate flare activations to determine if they are attributable to equipment malfunctions or other underlying causes. In this case, due to extreme freezing weather conditions, the air supply line to Sand Dunes South Corridor CTB flare valve froze, which caused the flare valve to remain in the open position. When an air supply line freezes, it traps pressure behind a frozen blockage in the air supply line and keeps a flare valve open. This prevents the "close" signal from reaching the actuator of the flare valve to actually close, so it remains stuck in the open position until the frozen blockage is removed or thawed. Once OXY control room operator received a flare alarm at the facility, OXY production technicians were promptly dispatched to take corrective actions to minimize emissions and take every action needed to cease flaring. Upon arrival, OXY field technicians promptly identified the issue as a frozen flare valve in the open position. The OXY production technician was able to isolate the frozen flare valve and began procedures to begin thawing the supply line and the flare valve. Additional field personnel had already

begun choking back base wells to cease flaring before the ice was being thawed. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the greatest extent.

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

The corrective measures taken in this instance was for the OXY production technician to promptly isolate the frozen flare valve and begin procedures to thaw the supply line and the flare valve. Additional field personnel assisted with choking back base wells to cease flaring as part of the corrective measures to cease flaring. OXY employs rigorous and effective winter facility operation practices, placing significant emphasis on thorough planning and execution of equipment winterization. Critical supply and connection lines and valves are insulated, wind walls are installed as needed, and heat tracing systems are utilized to maintain required operational temperatures. Additionally, OXY Operations teams ensure that piping and valves are wrapped with insulation blankets or covers. Insulation is not a heating source; in extreme, sustained, or below freezing temperatures, even insulated pipes, lines and valves will eventually freeze. While proper facility equipment winterization can potentially reduce the risk of freezing issues, freezing can still occur suddenly and unexpectedly, if the air dew point exceeds the ambient temperature, causing residual moisture to condense and freeze, regardless of any efforts made prior to the weather conditions occurring.

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 554534

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 554534
	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 554534

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 554534
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Prerequisites	
<i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident Well	Unavailable.
Incident Facility	[fAPP2127048458] Sand Dunes South Corridor CTB

Determination of Reporting Requirements	
<i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
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, major venting and/or flaring of natural gas.
<i>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.</i>	
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

Equipment Involved	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Weather Related > Frozen Air Supply Line > Flare Valve

Representative Compositional Analysis of Vented or Flared Natural Gas	
<i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	75
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	1
Oxygen (O2) percentage, if greater than one percent	0
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
Methane (CH4) percentage quality requirement	Not answered.
Nitrogen (N2) percentage quality requirement	Not answered.
Hydrogen Sulfide (H2S) PPM quality requirement	Not answered.
Carbon Dioxide (CO2) percentage quality requirement	Not answered.
Oxygen (O2) percentage quality requirement	Not answered.

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QUESTIONS, Page 2

Action 554534

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 554534
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	01/12/2026
Time vent or flare was discovered or commenced	06:55 AM
Time vent or flare was terminated	07:16 AM
Cumulative hours during this event	0

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	Cause: Other Other (Specify) Natural Gas Flared Released: 533 Mcf Recovered: 0 Mcf Lost: 533 Mcf.
Other Released Details	<i>Not answered.</i>
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	<i>Not answered.</i>
Downstream OGRID that should have notified this operator	<i>Not answered.</i>
Date notified of downstream activity requiring this vent or flare	<i>Not answered.</i>
Time notified of downstream activity requiring this vent or flare	<i>Not answered.</i>

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 OXY'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 employs rigorous and effective winter facility operation practices, placing significant emphasis on thorough planning and execution of equipment winterization. Critical supply and connection lines and valves are insulated, wind walls are installed as needed, and heat tracing systems are utilized to maintain required operational temperatures. Additionally, OXY Operations teams ensure that piping and valves are wrapped with insulation blankets or covers. In this case, due to extreme freezing weather conditions, the air supply line to Sand Dunes South Corridor CTB flare valve froze, which caused the flare valve to remain in the open position. When an air supply line freezes, it traps pressure behind a frozen blockage in the air supply line and keeps a flare valve open. This prevents the "close" signal from reaching the actuator of the flare valve to actually close, so it remains stuck in the open position until the frozen blockage is removed or thawed. This event could not have been foreseen, avoided, or prevented as this event occurred with no advance notice or warning. OXY made every effort to control and minimize emissions as much as possible during this event. The occurrence of this event was beyond OXY's control. 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. OXY took all possible measures to manage and reduce emissions to the greatest extent.

<p>Steps taken to limit the duration and magnitude of vent or flare</p>	<p>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 98% combustion efficiency to lessen emissions as much as possible. Internal OXY procedures ensure that upon notification of a flare triggered, production technicians are dispatched and instructed to assess the issue as soon as possible in order to take prompt corrective action to resolve the issue. OXY production technicians are required to evaluate flare activations to determine if they are attributable to equipment malfunctions or other underlying causes. In this case, due to extreme freezing weather conditions, the air supply line to Sand Dunes South Corridor CTB flare valve froze, which caused the flare valve to remain in the open position. When an air supply line freezes, it traps pressure behind a frozen blockage in the air supply line and keeps a flare valve open. This prevents the "close" signal from reaching the actuator of the flare valve to actually close, so it remains stuck in the open position until the frozen blockage is removed or thawed. Once OXY control room operator received a flare alarm at the facility, OXY production technicians were promptly dispatched to take corrective actions to minimize emissions and take every action needed to cease flaring. Upon arrival, OXY field technicians promptly identified the issue as a frozen flare valve in the open position. The OXY production technician was able to isolate the frozen flare valve and began procedures to begin thawing the supply line and the flare valve. Additional field personnel had already begun choking back base wells to cease flaring before the ice was being thawed.</p>
<p>Corrective actions taken to eliminate the cause and reoccurrence of vent or flare</p>	<p>The corrective measures taken in this instance was for the OXY production technician to promptly isolate the frozen flare valve and begin procedures to thaw the supply line and the flare valve. Additional field personnel assisted with choking back base wells to cease flaring as part of the corrective measures to cease flaring. OXY employs rigorous and effective winter facility operation practices, placing significant emphasis on thorough planning and execution of equipment winterization. Critical supply and connection lines and valves are insulated, wind walls are installed as needed, and heat tracing systems are utilized to maintain required operational temperatures. Additionally, OXY Operations teams ensure that piping and valves are wrapped with insulation blankets or covers. Insulation is not a heating source; in extreme, sustained, or below freezing temperatures, even insulated pipes, lines and valves will eventually freeze. While proper facility equipment winterization can potentially reduce the risk of freezing issues, freezing can still occur suddenly and unexpectedly, if the air dew point exceeds the ambient temperature, causing residual moisture to condense and freeze, regardless of any efforts made prior to the weather conditions occurring.</p>

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ACKNOWLEDGMENTS

Action 554534

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	Action Number: 554534
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ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<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 554534

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 554534
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	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.	2/17/2026