

EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** South Hobbs Unit**Start Date:** 07/07/2021 @ 06:24 AM**End Date:** 07/07/2021 @ 06:32 AM**Cause:** THE SOUTH PLANT FLARED DUE TO SHUTTING DOWN "B" TRAIN FOR SCHEDULED MAINTENANCE.**Duration of event:** 0:08 hours**Method of Flared Gas Measurement:** Flare Meter

1. Reason why this event was beyond Operator's control:

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure flame is lit and meeting opacity requirements.

This event was a scheduled event that was planned ahead of time to prevent a malfunction or shutdown. The South Hobbs Plant brought down "B" Train to perform preventive maintenance work. At this time Archrock mechanics tore into the compressor to investigate the compressor, and check clearances. Roto Versal is also servicing the lubrication system. Oxy mechanics also checked all pumps associated with the compressor. OXY operators assisted with shutting down the unit, and this shut down of the compressor unit triggered a flaring event. After inspecting and troubleshooting the compressor unit, the compressor mechanic brought the unit back to normal working service. OXY personnel were in place and available at the facility location when compressor unit was returned to working service.

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. OXY made every effort to control and minimize emissions as much as possible during this event.

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements.

In this case, the steps taken to limit duration and magnitude of flaring was for Oxy operators to quickly respond to the compressor equipment by quickly contacting the field, to immediately send out production techs to shut in wells in the field triggered a flaring event. In addition to shutting in wells, OXY routed all the stranded sales gas to a flare with a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements. After thoroughly inspecting the compressor unit, the plant operators brought the unit back to normal working service.

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. OXY made every effort to control and minimize emissions as much as possible during this event.

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

The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to ensure the flame is lit and meeting opacity requirements.

Oxy continually strives to maintain and operate its facility equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive compression equipment preventative maintenance program in place. OXY made every effort to control and minimize emissions as much as possible during this event. The only actions that Oxy can take and handle that is within its control, is to keep continue with its compression equipment preventative maintenance program for this unit.

OCCIDENTAL PERMIAN LTD.

Event ID: 114758 **Reporting Employee:** RICHARD ALVARADO
Lease Name: SOUTH HOBBS UNIT RCF **Account Number:** 33207
Equipment: Plant Inlet **NSR Permit Number:** 5418-R2
EPN: RCF - FLARE - SSM **Title V Permit Number:**
EPN Name: RCF flare - SSM **Reg Lease Number:**
Flare Point: Plant Inlet

Explanation of the Cause:

THE SOUTH PLANT FLARED DUE TO SHUTTING DOWN "B" TRAIN FOR SCHEDULED MAINTENANCE.

Event Type

Scheduled Maintenance
 Scheduled Maintenance
 Scheduled Maintenance

Corrective Actions Taken to Minimize Emissions:

OPERATIONS WILL LINE THE UNIT BACK UP WHEN THE MAINTENANCE IS COMPLETED TO REDUCE FLARING FOR THIS EVENT.

Actions taken to prevent recurrence:

OPERATIONS WILL LINE THE UNIT BACK UP WHEN THE MAINTENANCE IS COMPLETED TO REDUCE FLARING FOR THIS EVENT.

Emission Start Date	Emission End Date	Duration
7/7/2021 6:24:00 AM	7/7/2021 6:32:00 AM	0:08 hh:mm

NMED

Pollutant	Duration (hh:mm)	Avging Period	Excess Emission	Number of Exceedances	Permit Limit	Average Emission Rate	Total Pounds	Tons Per Year		
								Total	Next Drop off Date	Date Permit Exceeded
CO	0:08	1	0 LBS	0	168.20	153.27 LBS/HR	20.43	0.010218	7/16/2021	
H2S	0:08	1	0 LBS	0	14.60	3.36 LBS/HR	0.44	0.000225	7/16/2021	
NOX	0:08	1	0 LBS	0	29.70	17.87 LBS/HR	2.38	0.001192	7/16/2021	
SO2	0:08	1	0 LBS	0	1372.10	310.78 LBS/HR	41.43	0.020719	7/16/2021	
VOC	0:08	1	0 LBS	0	195.10	33.87 LBS/HR	4.51	0.002259	7/16/2021	

Reporting Status: Non-Reportable

NMOCD

Flare Stream Total	Total MCF	EPN	Latitude	Longitude	Reporting Status
40 MCF	70 MCF	RCF flare - SSM	32°40'40.890	103°9'35.360	Minor release

LEPC

Total MCF	H2S %	Unit Letter	Section	Township	Range
70	0.626	E	09	19 S	39 E

Pollutant	Emission rate	Reportable Qty
SO2	41.43 LBS/DAY	500 LBS/DAY
SO2	41.43 LBS/DAY	500 LBS/DAY
SO2	41.43 LBS/DAY	500 LBS/DAY

Reporting Status: Non-reportable

Emissions Calculations:

NOx = MCF flared x NOx factor from RG-109 x BTU/scf x 1000 scf/MCF x MMBTU/1000000 BTU

CO = MCF flared x CO factor from RG-109 x BTU/scf x 1000 scf/MCF x MMBTU/1000000 BTU

Gas was flared to reduce the hydrocarbon and/or H2S emissions to the atmosphere.

NMNE NG = MCF flared x 50 lb/mole x mole/.379 MCF x mol % NMNE NG x 0.02

NMNE NG % = 100% - Methane % - Ethane % - Carbon Dioxide % - Nitrogen %

H2S = MCF flared x 34 lb/mole x mole/.379 MCF x mol % H2S/100 x 0.02

SO2 = MCF flared x 64 lb/mole x mole/.379 MCF x mol % H2S/100 x 0.98

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 36507

QUESTIONS

Operator: OCCIDENTAL PERMIAN LTD P.O. Box 4294 Houston, TX 772104294	OGRID: 157984
	Action Number: 36507
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS**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 or is this venting or flaring caused by an emergency or malfunction	No
Did or will this venting or flaring last eight hours or more cumulatively within any 24-hour period from a single event	No
Is this considered a submission for a notification of a major venting or flaring	Yes, minor venting or flaring of natural gas.
The operator shall file a form C-141 instead of a form C-129 for a release that includes liquid during venting or flaring that is or may be a major or minor release under 19.13.29 NMAC.	
Was there or will there be at least 50 MCF of natural gas vented or flared during this event	Yes
Did this venting or flaring 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

Unregistered Facility Site

Please provide the facility details, if the venting or flaring occurred or is occurring at a facility that does not have an Facility ID (##) yet.

Facility or Site Name	Not answered.
Facility Type	Not answered.

Equipment Involved

Primary Equipment Involved	Not answered.
Additional details for Equipment Involved. Please specify	Not answered.

Representative Compositional Analysis of Vented or Flared Natural Gas

Please provide the mole percent for the percentage questions in this group.

Methane (CH4) percentage	4
Nitrogen (N2) percentage, if greater than one percent	0
Hydrogen Sulfide (H2S) PPM, rounded up	1
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	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.

Date(s) and Time(s)

Date venting or flaring was discovered or commenced	07/07/2021
Time venting or flaring was discovered or commenced	06:24 AM
Is the venting or flaring event complete	Yes
Date venting or flaring was terminated	07/07/2021
Time venting or flaring was terminated	06:32 AM
Total duration of venting or flaring in hours, if venting or flaring has terminated	0
Longest duration of cumulative hours within any 24-hour period during this event	0

Measured or Estimated Volume of Vented or Flared Natural Gas

Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Repair and Maintenance Other (Specify) Natural Gas Flared Spilled: 70 Mcf Recovered: 0 Mcf Lost: 70 Mcf]
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
Is this a gas only submission (i.e. only Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.

Venting or Flaring Resulting from Downstream Activity

Was or is this venting or flaring a result of downstream activity	Not answered.
Date notified of downstream activity requiring this venting or flaring	Not answered.
Time notified of downstream activity requiring this venting or flaring	Not answered.

Steps and Actions to Prevent Waste

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For this event, the operator could not have reasonably anticipated the current event and it was beyond the operator's control.	True
Please explain reason for why this event was beyond your operator's control	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements.
Steps taken to limit the duration and magnitude of venting or flaring	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements.
Corrective actions taken to eliminate the cause and reoccurrence of venting or flaring	The 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. It is OXY's policy to route all stranded sales gas to a flare during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare is regularly monitored to the ensure the flame is lit and meeting opacity requirements.

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CONDITIONS

Action 36507

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

CONDITIONS

Created By	Condition	Condition Date
system	If the information provided in this report requires an amendment, submit a [C-129] Request to Amend Venting and/or Flaring Incident, utilizing your incident number from this event.	7/15/2021