



Certificate of Analysis

Number: 6030-21060103-008A

Artesia Laboratory

200 E Main St.
Artesia, NM 88210
Phone 575-746-3481Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

June 11, 2021

Field: Turkey Track
 Station Name: Turkey Track CTB Check A
 Station Number: 14670A
 Station Location: CTB
 Sample Point: Meter
 Formation: Monthly
 County: Eddy
 Type of Sample: : Spot-Cylinder
 Heat Trace Used: N/A
 Sampling Method: : Fill and Purge
 Sampling Company: : SPL

Sampled By: Javier Lazo
 Sample Of: Gas Spot
 Sample Date: 06/08/2021 02:15
 Sample Conditions: 96 psia, @ 96 °F Ambient: 98 °F
 Effective Date: 06/08/2021 02:15
 Method: GPA-2261M
 Cylinder No: 1111-001201
 Instrument: 70104124 (Inficon GC-MicroFusion)
 Last Inst. Cal.: 05/24/2021 0:00 AM
 Analyzed: 06/11/2021 08:44:07 by KNF

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	6.654
Nitrogen	1.967	2.018	2.511		GPM TOTAL C3+	3.506
Methane	72.913	74.814	53.308		GPM TOTAL iC5+	1.028
Carbon Dioxide	0.237	0.243	0.475			
Ethane	11.489	11.789	15.745	3.148		
Propane	5.823	5.975	11.702	1.644		
Iso-butane	0.716	0.735	1.897	0.240		
n-Butane	1.838	1.886	4.869	0.594		
Iso-pentane	0.509	0.522	1.673	0.191		
n-Pentane	0.556	0.570	1.827	0.206		
Hexanes Plus	1.411	1.448	5.993	0.631		
	97.459	100.000	100.000	6.654		

Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7803	3.2176
Calculated Molecular Weight	22.51	93.19
Compressibility Factor	0.9959	

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1319	5113
Water Sat. Gas Base BTU	1297	5024
Ideal, Gross HV - Dry at 14.65 psia	1313.9	5113.2
Ideal, Gross HV - Wet	1290.9	5023.7
Net BTU Dry Gas - real gas	1199	
Net BTU Wet Gas - real gas	1178	

Comments: H2S Field Content 2.5 ppm
 Mcf/day 21793

Report generated by: Eric Ramirez

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Turkey Track CTB**Start Date:** 08/10/2021 @ 09:18 AM**End Date:** 08/10/2021 @ 10:13 AM**Cause:** Compressor Malfunctions > Gas lift compressor shutdown & low suction**Duration of event:** 55 minutes**Method of Flared Gas Measurement:** 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 or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, due to malfunction and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions.

In this case, there were two events in which flaring occurred. The first event occurred due to the gas lift compressors were shut down as part of a planned project to tie in on new line from the gas lift compressor station to the facility. All other compression at the facility was maximized in an effort not to flare, but the flow of gas into the facility began overwhelming the compressor engines at the central tank battery, which led OXY to route the overflow of sales gas to a flare with a 98% combustion efficiency in order to minimize emissions as much as possible. Flaring occurred from 09:18 AM to 09:43 AM.

The second event occurred when the tie-in was complete, and the gas lift compressors were all being restarted and returned to normal operations. The sales gas compressors at the central tank battery, all simultaneously malfunctioned and automatically shut down due to a low suction malfunction alarm. Oxy production techs quickly responded to the malfunction alarms and immediately inspected the sale gas compressors, determined the suction control sensor malfunctioned which triggered a shutdown of the units due to low suction. Oxy production techs quickly worked diligently to reset the compressor panels and restart all compressor units. This flaring event was an unforeseeable, unavoidable, and unplanned malfunction as a result of the suction control sensor losing communication with the compressor panel is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible. Flaring occurred from 10:48 AM to 11:18 AM.

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

It is OXY's policy to route all stranded sales gas to a flare during a sudden, unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has 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.

In this case, the steps taken to limit duration and magnitude of flaring was for Oxy production techs to maximize operation of all other compression at the central tank battery facility but the flow of gas into the facility began overwhelming the compressor engines at the central tank battery, which led OXY to route the overflow of sales gas to a flare with a 98% combustion efficiency in order to minimize emissions as much as possible. This first incident was completely out of Oxy's control to prevent from happening as every effort was made to not flare during this tie-in. OXY made every effort to control and minimize emissions as much as possible during this event.

In the case of the second incident, the steps taken to limit duration and magnitude of flaring was for Oxy production techs to quickly respond to the malfunction alarms and immediately inspected the sales gas compressors, which was then determined that the suction control sensor malfunctioned which triggered a shutdown of the units due to low suction. Oxy production techs quickly worked diligently to reset the compressor panels and restart all compressor units. This second flaring event was an unforeseeable, unavoidable, and unplanned malfunction as a result of the suction control sensor losing communication with the compressor panel and causing a low suction alarm is out of OXY's control to avoid or prevent from happening. 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:

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 cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as 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 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. 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 facility.

District I

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

District II

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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 41800

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 41800
	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	Yes
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	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare>Compressor Malfunctions > Gas lift compressor shutdown & low suction

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	3
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	08/10/2021
Time venting or flaring was discovered or commenced	09:18 AM
Is the venting or flaring event complete	Yes
Date venting or flaring was terminated	08/10/2021
Time venting or flaring was terminated	10:13 AM
Total duration of venting or flaring in hours, if venting or flaring has terminated	1
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	Cause: Other Other (Specify) Natural Gas Flared Spilled: 250 Mcf Recovered: 0 Mcf Lost: 250 Mcf]
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Flare Meter
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	No
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

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	See Justification Form >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 or prevented by good design, operation, and preventative maintenance practices. Internal OXY procedures ensure that upon gas compressor unit and/or multiple unit shutdown, due to malfunction and/or alarms, production techs are promptly notified, and are instructed to assess the issue as soon as possible in order to take prompt corrective action and minimize emissions.
Steps taken to limit the duration and magnitude of venting or flaring	See Justification Form >It is OXY's policy to route all stranded sales gas to a flare during a sudden, unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen 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	See Justification Form >Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of compressor malfunctions as 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 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. 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 facility.

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CONDITIONS

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	Action Number: 41800
	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.	8/12/2021