Atchafalaya Measurement Inc 416 East Main Street, Artesia NM 88210 575-746-3481

Sample Information

	Sample Information
Sample Name	OXY_Cedar Canyon CDP Check 4GC1-102119-23
Station Number	14970C
Lease Name	Cedar Canyon CDP Check 4
Analysis For	OXY USA
Producer	OXY USA
Field Name	Cedar Canyon
County/State	Eddy,NM
Frequency/Spot Sample	Monthly
Sampling Method	Fill EMpty
Sample Deg F	107
Atmos Deg F	68
Flow Rate	6084.144
Line PSIG	828
Date Sampled/Time Sampled	10-15-19
Cylinder Number	N/A
Cylinder Clean Date	N/A
Sampled By	Cameron Rivera
Analysis By	Pat Silvas
Verified/Calibrated Date	10-21-19
Report Date	2019-10-21 13:24:07

Component Results

Component Name	Ret. Time	Peak Area	Norm%	GPM (Dry) (Gal. / 1000 cu.ft.)
Nitrogen	22.920	12008.6	2.3046	0.000
H2S	46.000	0.0	0.0000	0.000
Methane	23.720	314345.6	77.4265	0.000
Carbon Dioxide	28.000	6671.3	1.0746	0.000
Ethane	37.440	78209.3	11.5237	3.075
Propane	78.980	47907.2	5.2440	1.441
i-Butane	29.940	42089.3	0.6030	0.197
n-Butane	32.320	96517.2	1.3238	0.416
i-Pentane	39.000	0.0	0.0000	0.000
n-Pentane	43.200	21055.0	0.2394	0.087
C6's	52.000	5380.0	0.0549	0.023
C7's	67.000	8272.0	0.1264	0.058
C8's	84.000	4555.0	0.0594	0.030
C9's	102.000	1495.0	0.0151	0.008
C10 Plus	146.000	1187.0	0.0046	0.003
Total:			100.0000	5.338

Results Summary

Result	Dry	Sat. (Base)
Total Raw Mole% (Dry)	102.5235	
Pressure Base (psia)	14.650	
Temperature Base	60.00	
Gross Heating Value (BTU / Ideal cu.ft.)	1201.2	1180.2
Gross Heating Value (BTU / Real cu.ft.)	1205.2	1184.6
Relative Density (G), Ideal	0.7208	0.7191
Relative Density (G), Real	0.7230	0.7215
Compressibility (Z) Factor	0.9966	0.9962

UPSET EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Cedar Canyon CDP CTB Date: 08/18/2021

Duration of event: 5 Hours 10 minutes **MCF Flared:** 334

1st Event Start Time: 05:20 AM End Time: 06:40 AM

2nd Event Start Time: 07:20 AM End Time: 10:20 AM

Cause: Downstream Activity > Enterprise > ORLA plant

Method of Flared Gas Measurement: Gas Flare Meter

Well API Associated with Facility: 30-015-41024 Cedar Canyon 16 State 002H

Comments: This upset event was not caused by any wells associated with the facility. This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable issue 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.

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

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility 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.

There were two flaring events that were both sudden and reasonably unforeseeable incidents outside of OXY's control, but that impacted OXY's upstream facility. In both instances, the problems occurred downstream of OXY's custody transfer point and out of OXY's control. The first instance of flaring occurred from 05:20 AM to 06:40 AM and was due a high line pressure spike on Enterprises gas sales system. The second instance of flaring occurred from 07:20 AM to 10:20 AM and was caused by third party pipeline operator, Enterprise, who owns and operates the gas pipeline, and who did not provide advance notice of the complete shut-in of their gas pipeline caused by the shutdown of their compressor station due to their associating facility, the ORLA plant, having high dewpoint gas in the residue gas stream. In both cases, Oxy production techs, upon noticing flaring occurring and receiving high line pressure alarms notifying them of an issue with the sales gas system, quickly inspected its facility compression equipment to determine cause and finding none, then contacted Enterprise regarding their downstream activity which was affecting Oxy's upstream facility. OXY was in communication with Enterprise throughout the outages in both flaring incidents and continually monitored the line pressure as well. OXY routed all routed its stranded gas to a flare in order to minimize emissions as much as possible.

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

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility 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 steps taken to limit duration and magnitude of flaring in the first event, occurring from 05:20 AM to 06:40 AM, was for Oxy production techs, upon noticing flaring occurring and receiving high line pressure alarms notifying them of an issue with the sales gas system, quickly inspected its facility compression equipment to determine cause and finding none, then contacted Enterprise regarding their downstream activity which was affecting Oxy's upstream facility. Oxy production techs immediately initiated emergency offloading alternative reactive plans, by sending some of its gas to San Mateo to reduce flaring, and then began procedures to switch two production wells to gas storage injection wells to stop flaring. Oxy productions techs worked with Enterprise personnel to monitor the line pressure and adjust its compression equipment when warranted. The steps taken to limit duration and magnitude of flaring during the second event, which occurred from 07:20 AM to 10:20 AM, was to again engage in emergency alternative reactive plans by rerouting its gas from Enterprise to San Mateo, and then began to shut in a number of wells to stop flaring, while Enterprise's gas pipeline was shut in to Oxy as a result of the ORLA plant having issues with high dewpoint gas in the residue stream. Until both third-party pipeline operators were able to resolve their downstream activity issues, OXY continued to keep its production wells shut-in pending such time Enterprise was able to resume normal working operations. Prior to both flaring incidents occurring, which were beyond Oxy's control to avoid or prevent from happening, Oxy's compression equipment was running and operating at maximized optimization. These incidents were completely out of Oxy's control to prevent from happening. 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:

Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, is out of Oxy's control to avoid or prevent from happening yet directly impacts Oxy's ability to send gas to them and causes Oxy's upstream facility to flare. When Enterprise's downstream facility shuts down and/or has facility equipment issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enterprise personnel during these types of situations. 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.

<u>District I</u> 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

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 46296

QUESTIONS

Operator:	OGRID:
OXY USA INC	16696
	Action Number:
Houston, TX 772104294	46296
	Action Type:
	[C-129] Venting and/or Flaring (C-129)
OLIESTIONS	

QUESTIONS

Prerequisites		
Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.		
Incident Well	[30-015-41024] CEDAR CANYON 16 STATE #002H	
Incident Facility	Not answered.	

Determination of Reporting Requirements			
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional guidance.			
Was or is this venting and/or flaring caused by an emergency or malfunction	Yes		
Did or will this venting and/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 and/or flaring	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 venting and/or flaring that is or may be a major or minor release under 19.15.29.7 NMAC.			
Was there or will there be at least 50 MCF of natural gas vented and/or flared during this event	Yes		
Did this venting and/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		
Was the venting and/or flaring within an incorporated municipal boundary or withing 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 > Downstream Activity > Enterprise > ORLA plant

Representative Compositional Analysis of Vented or Flared Natural Gas		
Please provide the mole percent for the percentage questions in this group.		
Methane (CH4) percentage	77	
Nitrogen (N2) percentage, if greater than one percent	2	
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	
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 Sufide (H2S) PPM quality requirement	Not answered.	
Carbon Dioxide (C02) percentage quality requirement	Not answered.	
Oxygen (02) percentage quality requirement	Not answered.	

Date(s) and Time(s)		
Date venting and/or flaring was discovered or commenced	08/18/2021	
Time venting and/or flaring was discovered or commenced	05:20 AM	
Time venting and/or flaring was terminated	10:20 AM	
Cumulative hours during this event	5	

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 Released: 334 Mcf Recovered: 0 Mcf Lost: 334 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		
Was or is this venting and/or flaring a result of downstream activity	Yes	
Date notified of downstream activity requiring this venting and/or flaring	08/18/2021	
Time notified of downstream activity requiring this venting and/or flaring 05:35 AM		

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 > The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility 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.
Steps taken to limit the duration and magnitude of venting and/or flaring	See Justification Form > The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline operator, which impacted Oxy's ability to send gas to a third-party gas pipeline. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline operator is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices.
Corrective actions taken to eliminate the cause and reoccurrence of venting and/or flaring	See Justification Form > Oxy cannot take any corrective actions to eliminate the cause and potential reoccurrence of an Enterprise gas flow pipeline restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to avoid or prevent from happening or reoccurring. Enterprise's downstream facility issues will re-occur from time to time and may trigger a spike in their gas line pressure, which in turn, is out of Oxy's control to avoid or prevent from happening yet directly impacts Oxy's ability to send gas to them and causes Oxy's upstream facility to flare. When Enterprise's downstream facility shuts down and/or has facility equipment issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of its stranded gas to flare. OXY makes every effort to control and minimize emissions as much as possible. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enterprise personnel during these types of situations. 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.

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

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**

CONDITIONS

Action 46296

CONDITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	46296
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
marialuna	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.	9/2/2021