

EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** North Hobbs Plant**Start Date:** 09/13/2021 @ 08:57 AM**End Date:** 09/13/2021 @ 03:51 PM**Cause:** THE NORTH PLANT FLARED WHEN THE WHOLE UNIT WAS SHUT DOWN FOR TIE-INS FROM THE EXPANSION PROJECT TO THE EXISTING PLANT.**Duration of event:** 6:54 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 sudden and unforeseeable event of all the compressors of the North Plant. Oxy operators were in the process of shutting down all of the plant for tie-ins from the expansion. The North Plant was completely shut down triggered a flaring event.

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 flame is lit and meeting opacity requirements.

In this case, in addition to all trains shutting down, 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

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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.

All trains were working as designed and operated normally prior to the shutdown of the compressor units. Oxy has a strong and positive compression equipment preventative maintenance program in place. This incident was completely out of OXY's control to prevent from happening as it was determined due to an emergency shut down to make tie-ins from the existing plant to the new expansion. 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.

District I

1625 N. French Dr., Hobbs, NM 88240
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District III

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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 51736

QUESTIONS

Operator: OCCIDENTAL PERMIAN LTD P.O. Box 4294 Houston, TX 772104294	OGRID: 157984
	Action Number: 51736
	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 these issues before continuing with the rest of the questions.

Incident Well	Not answered.
Incident Facility	[fKJ1517634129] NORTH HOBBS UNIT RCF/WIB

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 and/or flaring caused by an emergency or malfunction	No
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 venting and/or flaring event	Yes, major 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	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	7,860
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 and/or flaring was discovered or commenced	09/13/2021
Time venting and/or flaring was discovered or commenced	08:57 AM
Time venting and/or flaring was terminated	03:51 PM
Cumulative hours 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: Normal Operations Other (Specify) Natural Gas Flared Released: 4,367 Mcf Recovered: 0 Mcf Lost: 4,367 Mcf
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
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	Not answered.
Was notification of downstream activity received by you or your operator	Not answered.
Downstream OGRID that should have notified you or your operator	Not answered.
Date notified of downstream activity requiring this venting and/or flaring	Not answered.
Time notified of downstream activity requiring this venting and/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	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 and/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 and/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.

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CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
ralvarado	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.	9/24/2021