

EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** North Hobbs Plant**Start Date:** 09/22/2021 @ 01:41 PM**End Date:** 09/22/2021 @ 02:02 PM**Cause:** THE NORTH PLANT FLARED WHEN ALL TRAINS SHUT DOWN DUE TO HIGH/HIGH 1ST STAGE SUCTION PRESSURE.**Duration of event:** 0:21 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 compressor malfunction of all compressor units. Oxy operators were alerted to a malfunction of the compressor unit when an alarm started going off indicating a high/high alarm in the 1st stage suction pressure and a malfunction of the units. An Oxy operator quickly arrived at the facility and began to immediately inspect the unit and reading the shutdown alarms. Oxy operator determined that the compressor unit would need to be shut down so that he could perform a thorough inspection of the unit to determine exact cause involving the high/high alarm in the 1st stage suction pressure. OXY operators assisted with shutting down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. After thoroughly inspecting the compressor unit, the Oxy operator 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 compression equipment malfunction alarms by quickly contacting the operator that the compressor unit was rising, and a malfunction alarm was occurring. An Oxy operator quickly arrived at the facility and began to immediately inspect the unit and reading the shutdown alarms. Oxy operator determined that the compressor unit would need to be shut down so that he could perform a thorough inspection of the unit to determine exact cause involving the alarms. OXY operators assisted with shutting down the unit, and this shut down of the malfunctioning compressor unit triggered a flaring event. In addition to shutting all compressor units 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. After thoroughly inspecting the malfunctioning compressor unit for any other possible reasons the compressor unit might be getting shutdown alarms. After inspecting and troubleshooting the compressor unit, the operator 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 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. All trains were working as designed and operated normally prior to the sudden and without warning malfunction 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 the malfunction occurred due to a high/high alarm in the 1st stage suction pressure. 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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 53154

QUESTIONS

Operator: OCCIDENTAL PERMIAN LTD P.O. Box 4294 Houston, TX 772104294	OGRID: 157984
	Action Number: 53154
	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	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 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	09/22/2021
Time venting and/or flaring was discovered or commenced	01:41 PM
Time venting and/or flaring was terminated	02:02 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: Equipment Failure Other (Specify) Natural Gas Flared Released: 850 Mcf Recovered: 0 Mcf Lost: 850 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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	Action Type: [C-129] Venting and/or Flaring (C-129)

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.	9/30/2021