



Certificate of Analysis

Number: 6030-21100188-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Oct. 20, 2021

Field: Sand Dunes
Station Name: South Corridor East Central GL
Station Number: N/A
Station Location: Comp Station
Sample Point: Meter
Formation: Spot
County: Eddy
Type of Sample: : Spot-Cylinder
Heat Trace Used: No
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Scott Beasley
Sample Of: Gas Spot
Sample Date: 10/12/2021 08:55
Sample Conditions: 113.9 psig, @ 60 °F Ambient: 67 °F
Effective Date: 10/12/2021 08:55
Method: GPA-2261M
Cylinder No: 1111-002638
Instrument: 6030_GC6 (Inficon GC-3000 Micro)
Last Inst. Cal.: 10/18/2021 0:00 AM
Analyzed: 10/20/2021 11:16:31 by EJ R

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	3.660
Nitrogen	1.968	2.022	2.949		GPM TOTAL C3+	0.863
Methane	80.433	82.642	69.017		GPM TOTAL iC5+	0.041
Carbon Dioxide	1.770	1.819	4.167			
Ethane	10.208	10.489	16.418	2.797		
Propane	2.465	2.533	5.814	0.696		
Iso-butane	0.169	0.174	0.526	0.057		
n-Butane	0.215	0.221	0.669	0.069		
Iso-pentane	0.020	0.021	0.079	0.008		
n-Pentane	0.019	0.020	0.075	0.007		
Hexanes Plus	0.057	0.059	0.286	0.026		
	97.324	100.000	100.000	3.660		

Calculated Physical Properties

Relative Density Real Gas	0.6648	C6+	3.2176
Calculated Molecular Weight	19.21		93.19
Compressibility Factor	0.9973		

GPA 2172 Calculation:

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

Real Gas Dry BTU	1101	5113
Water Sat. Gas Base BTU	1082	5024
Ideal, Gross HV - Dry at 14.65 psia	1098.1	5113.2
Ideal, Gross HV - Wet	1078.9	5023.7
Net BTU Dry Gas - real gas	996	
Net BTU Wet Gas - real gas	979	

Comments: H2S Field Content 0 ppm

Data reviewed by: Krystle Fitzwater, Laboratory Manager

Quality Assurance:

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

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** Sand Dunes South Corridor East CGL**Vent Date:** 11/17/2021**Duration of event:** 24 Hours**MCF Flared:** 1700**Start Time:** 00:00 AM**End Time:** 11:59 PM**Cause:** JATCO BTEX Dehy System > Equipment Malfunction**Method of Flared Gas Measurement:** Gas Flare Meter

Comments: This venting event is from November 17th thru November 18th, 2021. A separate C-129 form will be submitted for the venting on November 18, 2021. This upset 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. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program.

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

This event was a sudden and unforeseeable JATCO BTEX dehy system malfunction caused by the JATCO pot on the compressor unit was hung up and didn't close properly, which triggered unexpected venting to occur. This is an unmanned facility. In this case, the Oxy production tech, while conducting an inspection of the facility on November 18, 2021, noticed venting off the JATCO dehy system and immediately began procedures to inspect the equipment. Upon noticing the JATCO pot was hung up and wasn't closed properly, the production tech simply reset the float device. Venting ceased once the JATCO pot was functioning properly and resumed normal working operation. The production tech stayed on-site for a brief period to ensure there were no further issues with the equipment. The JATCO BTEX dehy system was working normally and operating as designed prior to the venting malfunction occurring.

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

This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, situations and/or assist other personnel on-site for maintenance purposes. The steps taken to limit duration and magnitude of venting was for the production tech to immediately begin procedures to inspect the JATCO dehy equipment when venting was noticed during his walk-thru of the facility. Upon noticing the JATCO pot was hung up and wasn't closed properly, the production tech simply reset the float device. Venting ceased once the JATCO pot was reset and the dehy system resumed normal working operations. The JATCO BTEX dehy system was working normally and operating as designed prior to the sudden and without warning venting malfunction occurring.

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

This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, situations and/or assist other personnel on-site for maintenance purposes. Oxy is limited in the correction actions it can take to eliminate the cause and reoccurrence of this type of venting as notwithstanding JATCO BTEX dehy system design and operation, the overall equipment system is inherently dynamic, and malfunctions can occur which could be sudden, reasonably unforeseeable, and unexpected. Prior to the venting event occurring, the JATCO dehy system was working as designed and operated normally prior to the sudden and without warning venting malfunction.

District I

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District III

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District IV

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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

DEFINITIONS

Action 65531

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 65531
	Action Type: [C-129] Venting and/or Flaring (C-129)

DEFINITIONS

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:

- this application's operator, hereinafter "this operator";
- venting and/or flaring, hereinafter "vent or flare";
- any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";
- the statements in (and/or attached to) this, hereinafter "the statements in this";
- and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 65531

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 65531
	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	[fAPP2127226207] SAND DUNES SC EAST CGL COMP STATION

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 this vent or flare caused by an emergency or malfunction	Yes
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	Yes
Is this considered a submission for a vent or flare 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 at least 50 MCF of natural gas vented and/or flared during this event	Yes
Did this vent or flare 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 vent or flare within an incorporated municipal boundary or within 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	Emergency Flare > JATCO BTEX Dehy System > Equipment Malfunction

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	83
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	2
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.

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QUESTIONS, Page 2

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QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	11/17/2021
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	24

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: 1,700 Mcf Recovered: 0 Mcf Lost: 1,700 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 this vent or flare a result of downstream activity	No
Was notification of downstream activity received by this operator	Not answered.
Downstream OGRID that should have notified this operator	Not answered.
Date notified of downstream activity requiring this vent or flare	Not answered.
Time notified of downstream activity requiring this vent or flare	Not answered.

Steps and Actions to Prevent Waste	
For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control.	True
Please explain reason for why this event was beyond this operator's control	This event was a sudden and unforeseeable JATCO BTEX dehy system malfunction caused by the JATCO pot on the compressor unit was hung up and didn't close properly, which triggered unexpected venting to occur. This is an unmanned facility. In this case, the Oxy production tech, while conducting an inspection of the facility on November 18, 2021, noticed venting off the JATCO dehy system and immediately began procedures to inspect the equipment. Upon noticing the JATCO pot was hung up and wasn't closed properly, the production tech simply reset the float device. Venting ceased once the JATCO pot was functioning properly and resumed normal working operation. The production tech stayed on-site for a brief period to ensure there were no further issues with the equipment. The JATCO BTEX dehy system was working normally and operating as designed prior to the venting malfunction occurring.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, situations and/or assist other personnel on-site for maintenance purposes. The steps taken to limit duration and magnitude of venting was for the production tech to immediately begin procedures to inspect the JATCO dehy equipment when venting was noticed during his walk-thru of the facility. Upon noticing the JATCO pot was hung up and wasn't closed properly, the production tech simply reset the float device. Venting ceased once the JATCO pot was reset and the dehy system resumed normal working operations. The JATCO BTEX dehy system was working normally and operating as designed prior to the sudden and without warning venting malfunction occurring.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, situations and/or assist other personnel on-site for maintenance purposes. Oxy is limited in the correction actions it can take to eliminate the cause and reoccurrence of this type of venting as notwithstanding JATCO BTEX dehy system design and operation, the overall equipment system is inherently dynamic, and malfunctions can occur which could be sudden, reasonably unforeseeable, and unexpected. Prior to the venting event occurring, the JATCO dehy system was working as designed and operated normally prior to the sudden and without warning venting malfunction.

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

☒	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be a complete C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
☒	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to this operator) to track any C-129 forms, pursuant to 19.15.27.7 and 19.15.28.8 NMAC and understand that this submission meets the notification requirements of Paragraph (1) of Subsection G and F respectively.
☒	I hereby certify the statements in this report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
☒	I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.
☒	I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.

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CONDITIONS

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	Action Number: 65531
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
marialuna2	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.	12/8/2021