



## Certificate of Analysis

Number: 6030-20110087-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Nov. 17, 2020

Field: NMSW  
Station Name: Corral Compressor Station 2 South  
Station Number: N/A  
Sample Point: N/A  
Meter Number:  
County: Eddy  
Type of Sample: Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: Fill and Purge  
Sampling Company: OXY

Sampled By: Jesus Escobedo  
Sample Of: Gas Spot  
Sample Date: 11/11/2020 01:09  
Sample Conditions: 1265 psig Ambient: 49 °F  
Effective Date: 11/11/2020 01:09  
Method: GPA 2286  
Cylinder No: 1111-001162  
Instrument: 6030\_GC2 (Agilent GC-7890B)  
Last Inst. Cal.: 08/25/2020 8:12 AM  
Analyzed: 11/17/2020 12:40:16 by PGS

## Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.000	0.000	0.000		GPM TOTAL C2+	6.390
Nitrogen	1.332	1.320	1.675		GPM TOTAL C3+	3.359
Methane	76.899	76.201	55.381		GPM TOTAL iC5+	0.805
Carbon Dioxide	0.171	0.169	0.337			
Ethane	11.459	11.355	15.468	3.031		
Propane	5.781	5.728	11.443	1.575		
Iso-butane	0.846	0.838	2.207	0.274		
n-Butane	2.259	2.238	5.893	0.705		
Iso-pentane	0.642	0.636	2.079	0.232		
n-Pentane	0.766	0.759	2.481	0.275		
Hexanes Plus	0.763	0.756	3.036	0.298		
	100.918	100.000	100.000	6.390		

## Calculated Physical Properties

Relative Density Real Gas	Total	C6+
	0.7649	3.0584
Calculated Molecular Weight	22.07	88.58
Compressibility Factor	0.9960	

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1308	4763
Water Sat. Gas Base BTU	1285	4680
Ideal, Gross HV - Dry at 14.65 psia	1302.9	4763.5
Ideal, Gross HV - Wet	1280.1	0.000
Net BTU Dry Gas - real gas	1188	
Net BTU Wet Gas - real gas	1167	

Comments: H2S Field Content 0 ppm

Hydrocarbon Laboratory Manager

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



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Sampling Method: Fill and Purge

Sampled By: Jesus Escobedo  
Sample Of: Gas Spot  
Sample Date: 11/11/2020 01:09  
Sample Conditions: 1265 psig  
Method: GPA 2286  
Cylinder No: 1111-001162  
Analyzed: 11/17/2020 13:21:28 by PGS  
Sampling Company: OXY

## Analytical Data

Components	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	NIL	NIL		GPM TOTAL C2+
Nitrogen	1.320	1.675		GPM TOTAL C3+
Methane	76.201	55.381		GPM TOTAL iC5+
Carbon Dioxide	0.169	0.337		
Ethane	11.355	15.468	3.031	
Propane	5.728	11.443	1.575	
Iso-Butane	0.838	2.207	0.274	
n-Butane	2.238	5.893	0.705	
Iso-Pentane	0.636	2.079	0.232	
n-Pentane	0.759	2.481	0.275	
Hexanes	0.374	1.443	0.152	
Heptanes Plus	0.382	1.593	0.146	
	100.000	100.000	6.390	

## Calculated Physical Properties

Relative Density Real Gas	0.7649	C7+
Calculated Molecular Weight	22.07	91.92
Compressibility Factor	0.9960	

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

Real Gas Dry BTU	1308	4850
Water Sat. Gas Base BTU	1285	4766
Ideal, Gross HV - Dry at 14.65 psia	1302.9	4850.4
Ideal, Gross HV - Wet	1280.1	NIL

Comments: H2S Field Content 0 ppm

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Analyzed: 11/17/2020 13:21:28 by PGS  
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## Analytical Data

Components	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	NIL	NIL		GPM TOTAL C2+ 6.390
Nitrogen	1.320	1.675		
Methane	76.201	55.381		
Carbon Dioxide	0.169	0.337		
Ethane	11.355	15.468	3.031	
Propane	5.728	11.443	1.575	
Iso-Butane	0.838	2.207	0.274	
n-Butane	2.238	5.893	0.705	
Iso-Pentane	0.636	2.079	0.232	
n-Pentane	0.759	2.481	0.275	
i-Hexanes	0.229	0.880	0.092	
n-Hexane	0.145	0.563	0.060	
Benzene	0.036	0.125	0.010	
Cyclohexane	0.091	0.348	0.031	
i-Heptanes	0.135	0.566	0.054	
n-Heptane	0.027	0.125	0.013	
Toluene	0.015	0.065	0.005	
i-Octanes	0.065	0.307	0.029	
n-Octane	0.003	0.015	0.001	
Ethylbenzene	0.001	0.002	NIL	
Xylenes	0.003	0.010	0.001	
i-Nonanes	0.005	0.025	0.002	
n-Nonane	0.001	0.003	NIL	
i-Decanes	NIL	NIL	NIL	
n-Decane	NIL	0.001	NIL	
Undecanes	NIL	0.001	NIL	
Dodecanes	NIL	NIL	NIL	
Tridecanes	NIL	NIL	NIL	
Tetradecanes Plus	NIL	NIL	NIL	
	100.000	100.000	6.390	



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Calculated Physical Properties	Total
Calculated Molecular Weight	22.073

**GPA 2172 Calculation:****Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F**

Real Gas Dry BTU	1308.0
Water Sat. Gas Base BTU	1285.2
Relative Density Real Gas	0.7649
Compressibility Factor	0.9960

**Comments:** H2S Field Content 0 ppm

Hydrocarbon Laboratory Manager

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

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Corral CS 2S**Flare Date:** 02/09/2022**Duration of event:** 2 Hours 9 minutes**MCF Flared:** 94**Start Time:** 03:35 AM**End Time:** 06:45 AM**Cause:** ETC > Shut In > High O2**Method of Flared Gas Measurement:** Gas Flare Meter

**Comments:** This upset event was not caused by any wells associated with the facility. 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.

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**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 downstream pipeline operator, which impacted Oxy's ability to send gas to a third-party downstream gas pipeline. This interruption, restriction, or complete shut-in of the gas pipeline by a thirdparty 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. In this case, there were two separate incidents where flaring occurred due to unexpected shut in's by ETC caused by high O2 in the sales gas service pipeline. Sales gas had to be flared rather than be compressed when O2 was introduced into the gas system during a routine condensate off-load. ETC pipeline sales valve automatically closed when high O2 was detected. This was caused when a standard vacuum truck was unloading condensate into a divert tank at the Corral Canyon 36-25 CTB. The vacuum truck driver should have been able to shut his valve before O2 was introduced into the divert tank. The vacuum truck driver did not react fast enough during the off load and pushed O2 into the tank by accident. As a result of ETC's pipeline sales valve detecting the high O2 and its valve shutting in, ETC shut in their pipeline until OXY cleared the O2 in the gas stream, for safety reasons.

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

It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. In this case, everything on OXY's side worked as it should. ETC was notified by OXY of the O2 accidentally pushed into

the system by a third-party vacuum truck operator and that the pipeline would be cleared of O<sub>2</sub> as soon as possible. As a result of O<sub>2</sub> in the gas stream, ETC shut in their pipeline until OXY purged the O<sub>2</sub> from the system. The flares are regularly monitored per the facility's General Construction Permit (GCP) requirements to ensure flames are lit and meeting opacity requirements.

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

Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of O<sub>2</sub> accidentally pushed into the sales gas service system pipeline by a third-party vacuum truck operator. OXY makes every effort to control and minimize emissions as much as possible. The limited reactive actions that Oxy can do in this circumstance is to immediately purge the O<sub>2</sub> from the system as well as continually communicate with ETC personnel throughout these type of situations.

**District I**  
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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  
**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**

DEFINITIONS  
  
Action 84165

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 84165
	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: <ul style="list-style-type: none"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul>
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**Santa Fe, NM 87505**

QUESTIONS

Action 84165

**QUESTIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 84165
	Action Type: [C-129] Venting and/or Flaring (C-129)

**QUESTIONS**

<b>Prerequisites</b>	
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	[fAPP2126640958] CORRAL #2 SOUTH COMP STATION

<b>Determination of Reporting Requirements</b>	
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	No
Is this considered a submission for a vent or flare event	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 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 <b>ANY</b> 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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

<b>Equipment Involved</b>	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > ETC > Shut In > High O2

<b>Representative Compositional Analysis of Vented or Flared Natural Gas</b>	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	76
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
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.



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QUESTIONS, Page 2

Action 84165

QUESTIONS (continued)

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:  16696
	Action Number:  84165
	Action Type:  [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	02/09/2022
Time vent or flare was discovered or commenced	03:35 AM
Time vent or flare was terminated	06:45 AM
Cumulative hours during this event	3

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: 94 Mcf   Recovered: 0 Mcf   Lost: 94 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	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 downstream pipeline operator, which impacted Oxy's ability to send gas to a third-party downstream gas pipeline. This interruption, restriction, or complete shut-in of the gas pipeline by a thirdparty 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. In this case, there were two separate incidents where flaring occurred due to unexpected shut in's by ETC caused by high O2 in the sales gas service pipeline. Sales gas had to be flared rather than be compressed when O2 was introduced into the gas system during a routine condensate off-load. ETC pipeline sales valve automatically closed when high O2 was detected. This was caused when a standard vacuum truck was unloading condensate into a divert tank at the Corral Canyon 36-25 CTB. The vacuum truck driver should have been able to shut his valve before O2 was introduced into the divert tank. The vacuum truck driver did not react fast enough during the off load and pushed O2 into the tank by accident. As a result of ETC's pipeline sales valve detecting the high O2 and its valve shutting in, ETC shut in their pipeline until OXY cleared the O2 in the gas stream, for safety reasons.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon notice of flaring, malfunction gas compressor unit and/or multiple unit shutdown alarms, increased sensor line pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. In this case, everything on OXY's side worked as it should. ETC was notified by OXY of the O2 accidentally pushed into the system by a third-party vacuum truck operator and that the pipeline would be cleared of O2 as soon as possible. As a result of O2 in the gas stream, ETC shut in their pipeline until OXY purged the O2 from the system. The flares are regularly monitored per the facility's General Construction Permit (GCP) requirements to ensure flames are lit and meeting opacity requirements.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of O2 accidentally pushed into the sales gas service system pipeline by a third-party vacuum truck operator. OXY makes every effort to control and minimize emissions as much as possible. The limited reactive actions that Oxy can do in this circumstance is to immediately purge the O2 from the system as well as continually communicate with ETC personnel throughout these type of situations.

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ACKNOWLEDGMENTS

Action 84165

**ACKNOWLEDGMENTS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 84165
	Action Type: [C-129] Venting and/or Flaring (C-129)

**ACKNOWLEDGMENTS**

<input checked="" type="checkbox"/>	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 <b>complete</b> C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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  
  
Action 84165

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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.	2/24/2022