



Certificate of Analysis

Number: 6030-21110261-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Dec. 01, 2021

Field: Sand Dunes
Station Name: Sand Dunes CTB Production 2
Station Number: 17012P
Station Location: CTB
Sample Point: Meter
Formation: Monthly
County: Eddy, NM
Type of Sample: : Spot-Cylinder
Heat Trace Used: No
Sampling Method: : Fill and Purge
Sampling Company: : SPL

Sampled By: Scott Beasely
Sample Of: Gas Spot
Sample Date: 11/23/2021 10:21
Sample Conditions: 77.7 psig, @ 62.5 °F Ambient: 61 °F
Effective Date: 11/23/2021 10:21
Method: GPA-2261M
Cylinder No: 1111-002678
Instrument: 70142339 (Inficon GC-MicroFusion)
Last Inst. Cal.: 11/15/2021 0:00 AM
Analyzed: 12/01/2021 14:47:44 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	1.720	1.73503	2.237	
Carbon Dioxide	1.746	1.76105	3.568	
Methane	75.250	75.89815	56.047	
Ethane	11.338	11.43562	15.828	3.052
Propane	5.503	5.55083	11.267	1.526
Iso-Butane	0.699	0.70513	1.887	0.230
n-Butane	1.672	1.68661	4.512	0.531
Iso-Pentane	0.353	0.35584	1.182	0.130
n-Pentane	0.377	0.38035	1.263	0.138
Hexanes	0.214	0.21574	0.856	0.089
Heptanes	0.170	0.17177	0.792	0.079
Octanes	0.080	0.08109	0.426	0.041
Nonanes Plus	0.023	0.02279	0.135	0.013
	99.145	100.00000	100.000	5.829

Calculated Physical Properties

Calculated Molecular Weight	Total	C9+
Compressibility Factor	21.72	128.26
Relative Density Real Gas	0.9963	
	0.7526	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1243.1	6974.4
Water Sat. Gas Base BTU	1221.9	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1238.5	6974.4
Ideal, Gross HV - Wet	1216.9	6852.4

Comments: H2S Field Content 0 ppm
Mcf/day 24561.39

Jesus Escobedo

Carly Retana

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:** Sand Dunes South Corridor CTB**Flare Date:** 03/25/2022**Duration of event:** 45 Minutes**MCF Flared:** 334**Start Time:** 03:05 PM**End Time:** 03:50 PM**Cause:** Downstream Activity Issue > Enterprise > Facility Emergency Shutdown**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, third-party pipeline operator, Enterprise, had an emergency shutdown of their downstream Sand Dunes North Corridor station facility, which was triggered by their fire detection alarm devices, prompting an immediate shutdown of their facility. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility, which, in turn, caused a flaring event at Oxy's upstream facility as Oxy was unable to push its gas to Enterprise's sales gas service pipeline system. Once flaring began at Oxy's facility, Oxy production technician contacted Enterprise gas control, who relayed the details of the ESD triggered by a false fire detection alarm, and that their own technician was on-site to resolve the issue. Oxy's facility equipment were operating as designed prior to the flaring event occurring. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, the ESD system or valve, and/or issues with their downstream facility. Oxy's facility equipment were operating as designed prior to the flaring event occurring. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, the ESD system or valve, and/or issues with their downstream facility.

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

It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible.

In this case, third-party pipeline operator, Enterprise, had an emergency shutdown of their downstream Sand Dunes North Corridor station facility, which was triggered by their fire detection alarm devices, prompting an immediate shutdown of their facility. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility, which, in turn, caused a flaring event at Oxy's upstream facility as Oxy was unable to push its gas to Enterprise's sales gas service pipeline system. Once flaring began at Oxy's facility, Oxy production technician contacted Enterprise gas control, who relayed the details of the ESD triggered by a false fire detection alarm, and that their own technician was on-site to resolve the issue. Once Oxy personnel were informed of Enterprises' ESD issue and its cause, the Oxy production tech, who was on-site, and additional field personnel began engaging in secondary alternative offloading procedures to other third-party downstream operators, DCP and LUCID. Oxy's facility equipment were operating as designed prior to the flaring event occurring. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, the ESD system or valve, and/or issues with their downstream facility.

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 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, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible during these circumstances.

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
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 97099

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 97099
	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.
--

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

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 97099

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 97099
	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	[fAPP2127048458] Sand Dunes South Corridor CTB

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	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 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 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 Issue > Enterprise > Facility Emergency Shutdown

Representative Compositional Analysis of Vented or Flared Natural Gas

Please provide the mole percent for the percentage questions in this group.

Methane (CH4) percentage	76
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.

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
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, Page 2

Action 97099

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 97099
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	03/25/2022
Time vent or flare was discovered or commenced	03:05 PM
Time vent or flare was terminated	03:50 PM
Cumulative hours during this event	1

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 this vent or flare a result of downstream activity	Yes
Was notification of downstream activity received by this operator	No
Downstream OGRID that should have notified this operator	[713731] Enterprise Crude Pipeline LLC
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 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. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production techs must assess and determine cause of flaring at its upstream facility. In this case, third-party pipeline operator, Enterprise, had an emergency shutdown of their downstream Sand Dunes North Corridor station facility, which was triggered by their fire detection alarm devices, prompting an immediate shutdown of their facility. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility, which, in turn, caused a flaring event at Oxy's upstream facility as Oxy was unable to push its gas to Enterprise's sales gas service pipeline system. Once flaring began at Oxy's facility, Oxy production technician contacted Enterprise gas control, who relayed the details of the ESD triggered by a false fire detection alarm, and that their own technician was on-site to resolve the issue. Oxy's facility equipment were operating as designed prior to the flaring event occurring.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route all stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has a 98% combustion efficiency to lessen emissions as much as possible. In this case, third-party pipeline operator, Enterprise, had an emergency shutdown of their downstream Sand Dunes North Corridor station facility, which was triggered by their fire detection alarm devices, prompting an immediate shutdown of their facility. This sudden and unexpected Enterprise facility shutdown greatly impacted the gas flow from Oxy's upstream facility, which, in turn, caused a flaring event at Oxy's upstream facility as Oxy was unable to push its gas to Enterprise's sales gas service pipeline system. Once flaring began at Oxy's facility, Oxy production technician contacted Enterprise gas control, who relayed the details of the ESD triggered by a false fire detection alarm, and that their own technician was on-site to resolve the issue. Once Oxy personnel were informed of Enterprises' ESD issue and its cause, the Oxy production tech, who was on-site, and additional field personnel began engaging in secondary alternative offloading procedures to other third-party downstream operators, DCP and LUCID. Oxy's facility equipment were operating as designed prior to the flaring event occurring. No advance warning of any kind was provided to Oxy personnel from Enterprise personnel regarding issues with their sales gas service system pipeline, the ESD system or valve, and/or issues with their downstream facility.
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 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, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise downstream facility and/or its facility equipment has issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts or cuts off Oxy's ability to send gas, which then prompts Oxy to route its stranded gas not pushed into the Enterprise gas pipeline, to flare. OXY makes every effort to control and minimize emissions as much as possible during these circumstances.

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

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

ACKNOWLEDGMENTS

Action 97099

ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 97099
	Action Type: [C-129] Venting and/or Flaring (C-129)

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.

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

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

CONDITIONS

Action 97099

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 97099
	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.	4/9/2022