UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: North Hobbs Unit WIB Flare Date: 05/12/2022

Duration of event: 2 hours MCF Flared: 446

Start Time: 01:50 PM End Time: 3:50 PM

Cause: Compression Equipment Shut down > filter change >tripped Alarm>differential pressure

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: Oxy engages in respectable and good facility operation practices while also maintaining its continuous equipment preventative maintenance program. Internal OXY procedures ensure that upon a gas compressor unit shutdown, production techs are promptly notified via an equipment alarm notification app and are trained to respond immediately in order to assess the issue as soon as possible, so that prompt corrective actions are taken to minimize emissions. Oxy production techs must assess whether a gas compressor unit shutdown is due to damage and repair is needed, or whether there are other reasons for its cause.

In this case the LP 4500 compressor was being serviced by the Maintenance technician and during the oil lube filters being changed he removed the second filter to fast causing he unit to go down on filter differential Pressure. An Alarm was sent out by the Answering service and alerted the Operator that the unit was down and also alarms on vessel high pressure and VRU discharge pressure high. After his arrival and discussion with the Maintenance tech operator cut back inlet and shut off production until service was done to limit the volume of emissions. Once filters were changed Tech reset and tried to restart compressor but timed out two time delaying the start time. Taken to limit duration and magnitude of venting or flaring: It is OXY's policy to route all stranded sales gas to a flare during a sudden, unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. The Gas Sales compressor unit was working as designed and operated normally prior to the sudden and without warning automatic shutdown of the compressor unit. Flaring ceased as soon as the compressor unit was up to normal working condition and speed. In this case steps taken to limit emission was to reduced production and reroute gas to emergency flare until filters were changed and unit was reset and restarted.

2. 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. 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. The only actions that Oxy can take and handle that is within its control, is to continue with its compression equipment preventative maintenance program for this facility's compression equipment.

Page 2 of 2

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

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 114424

DEFINITIONS

Operator:	OGRID:
OCCIDENTAL PERMIAN LTD	157984
P.O. Box 4294	Action Number:
Houston, TX 772104294	114424
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

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.

<u>District I</u> 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

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 114424

QUESTIONS

Operator:	OGRID:
OCCIDENTAL PERMIAN LTD	157984
P.O. Box 4294	Action Number:
Houston, TX 772104294	114424
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

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 Operator [157984] OCCIDENTAL PERMIAN LTD		
Incident Type	Flare	
Incident Status	Closure Approved	
Incident Well Not answered.		
Incident Facility	[fAPP2126544726] NORTH HOBBS UNIT WIB	
Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application.		

Determination of Reporting Requirements		
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional 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	

Equipment Involved	
Primary Equipment Involved Other (Specify)	
Additional details for Equipment Involved. Please specify	Compression Equipment Shut down > Filter Change > Tripped Alarm Filter Differential Pressure

Representative Compositional Analysis of Vented or Flared Natural Gas			
Please provide the mole percent for the percentage questions in this group.			
Methane (CH4) percentage	3		
Nitrogen (N2) percentage, if greater than one percent	0		
Hydrogen Sulfide (H2S) PPM, rounded up	24,000		
Carbon Dioxide (C02) percentage, if greater than one percent	89		
Oxygen (02) 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	0		
Nitrogen (N2) percentage quality requirement	0		
Hydrogen Sufide (H2S) PPM quality requirement	0		
Carbon Dioxide (C02) percentage quality requirement	0		
Oxygen (02) percentage quality requirement	0		

QUESTIONS, Page 2

Action 114424

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720

District III

1000 Rio Brazos Rd., Aztec, NM 87410

Phone:(575) 738-6161 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

Is this a gas only submission (i.e. only significant Mcf values reported)

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS (continued)

Operator:	OGRID:	
OCCIDENTAL PERMIAN LTD	157984	
P.O. Box 4294	Action Number:	
Houston, TX 772104294	114424	
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)	
QUESTIONS	[o 120] Alliona Voltaing and/or Finding (o 1207)	
Date(s) and Time(s)		
Date vent or flare was discovered or commenced	05/12/2022	
Time vent or flare was discovered or commenced	01:50 PM	
Time vent or flare was terminated	03:50 PM	
Cumulative hours during this event	2	
	<u> </u>	
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: 446 MCF Recovered: 0 MCF Lost: 446 MCF]	
Other Released Details	Not answered.	
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.	

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	No	
Downstream OGRID that should have notified this operator	0	
Date notified of downstream activity requiring this vent or flare	01/01/1900	
Time notified of downstream activity requiring this vent or flare	Not answered.	

Yes, according to supplied volumes this appears to be a "gas only" report.

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	Oxy engages in respectable and good facility operation practices while also maintaining its continuous equipment preventative maintenance program. Internal OXY procedures ensure that upon a gas compressor unit shutdown, production techs are promptly notified via an equipment alarm notification app and are trained to respond immediately in order to assess the issue as soon as possible, so that prompt corrective actions are taken to minimize emissions. Oxy production techs must assess whether a gas compressor unit shutdown is due to damage and repair is needed, or whether there are other reasons for its cause. In this case the LP 4500 compressor was being serviced by the Maintenance technician and during the oil lube filters being changed he removed the second filter to fast causing he unit to go down on filter differential Pressure. An Alarm was sent out by the Answering service and alerted the Operator that the unit was down and also alarms on vessel high pressure and VRU discharge pressure high. After his arrival and discussion with the Maintenance tech operator cut back inlet and shut off production until service was done to limit the volume of emissions. Once filters were changed Tech reset and tried to restart compressor but timed out two time delaying the start time.
Steps taken to limit the duration and magnitude of vent or flare	It is OXY's policy to route all stranded sales gas to a flare during a sudden, unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible. The flare at this facility has a 98% combustion efficiency in order to lessen emissions as much as possible. The flare is regularly monitored to the ensure flame is lit and meeting opacity requirements. The Gas Sales compressor unit was working as designed and operated normally prior to the sudden and without warning automatic shutdown of the compressor unit. Flaring ceased as soon as the compressor unit was up to normal working condition and speed. In this case steps taken to limit emission was to reduced production and reroute gas to emergency flare until filters were changed and unit was reset and restarted.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	: 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. 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. The only actions that Oxy can take and handle that is within its control, is to continue with its compression equipment preventative maintenance program for this facility's compression equipment.

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

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 114424

ACKNOWLEDGMENTS

Operator:	OGRID:
OCCIDENTAL PERMIAN LTD	157984
P.O. Box 4294	Action Number:
Houston, TX 772104294	114424
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

ACKNOWLEDGMENTS

$\overline{\lor}$	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
~	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
~	I hereby certify the statements in this amending 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

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 114424

CONDITIONS

Operator:	OGRID:
OCCIDENTAL PERMIAN LTD	157984
P.O. Box 4294	Action Number:
Houston, TX 772104294	114424
	Action Type:
	[C-129] Amend Venting and/or Flaring (C-129A)

CONDITIONS

Created		Condition
Ву		Date
srojas	If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	6/7/2022