

Volumetrics Inc.

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

Company: OXY USA INC
Field/Location: NMSW

Station Name: CEDAR CANYON TO ENTERPRISE

Station Number: NA

 Sample Date:
 3/10/22 2:40 PM

 Analysis Date:
 3/17/22 8:30 PM

 Instrument:
 INFICON

 Calibration/Verification Date:
 3/17/2022

Heat Trace used: YES

Work Order: 4000535215 Sampled by: OXY/JE

Sample Type : SPOT-CYLINDER

Sample Temperature (F): NA
Sample Pressure (PSIG): 1237
Flow rate (MCF/Day): NA
Ambient Temperature (F): 50

Sampling method: FILL & EMPTY

Cylinder Number: 27772

NATURAL GAS	ANALYSIS:	GPA 2261
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	Un-Normalized	Normalized	GPM	GPM	GPM
Components	Mol%	Mol%	14.650	14.730	15.025
Hydrogen Sulfide	0.0000	0.0000			
Nitrogen	1.4010	1.4329			
Methane	73.2835	74.9537			
Carbon Dioxide	0.1272	0.1301			
Ethane	12.0004	12.2739	3.277	3.295	3.361
Propane	6.1002	6.2392	1.716	1.726	1.760
Isobutane	0.8643	0.8840	0.289	0.290	0.296
N-butane	2.1629	2.2122	0.696	0.700	0.714
Isopentane	0.5139	0.5256	0.192	0.193	0.197
N-Pentane	0.5755	0.5886	0.213	0.214	0.218
Hexanes(C6's)	0.3556	0.3637	0.149	0.150	0.153
Heptanes (C7's)	0.2741	0.2804	0.129	0.130	0.132
Octanes (C8's)	0.1001	0.1024	0.052	0.053	0.054
Nonanes Plus (C9+)	0.0130	0.0133	0.007	0.008	0.008
Total	97.7718	100.0000			

Physical Properties (Calculated)	14.650 psia	14.730 psia	15.025 psia
Total GPM Ethane+	6.721	6.758	6.893
Total GPM Iso-Pentane+	0.743	0.747	0.762
Compressibility (Z)	0.9959	0.9959	0.9958
Specific Gravity (Air=1) @ 60 °F	0.7713	0.7713	0.7714
Molecular Weight	22.257	22.257	22.257
Gross Heating Value	14.650 psia	14.730 psia	15.025 psia
Dry, Real (BTU/Ft ³)	1318.1	1325.3	1352.0
Wet, Real (BTU/Ft ³)	1295.0	1302.1	1328.3
Dry, Ideal (BTU/Ft ³)	1312.7	1319.9	1346.3
Wet, Ideal (BTU/Ft ³)	1289.7	1296.8	1322.7

Temperature base 60 °F

Comment: FIELD H2S =0 PPM

Verified by

Mostaq Ahammad Petroleum Chemist Approved by

Deann Friend Laboratory Manager

UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Cedar Canyon CDP Flare Date: 08/21/2022

Duration of event: 1 Hour 25 Minutes **MCF Flared:** 196

Start Time: 12:20 AM End Time: 01:45 AM

Cause: Downstream Activity > Enterprise > Plant Issues

Method of Flared Gas Measurement: Gas Flare Meter

Comments: This reported event represents four (4) same-cause flaring occurrences within a 24-hr. period. Each occurrent listed below was caused by Enterprise, a third-party sale gas pipeline operator, whose downstream plant was having equipment issues. This event is not a major event as the combined flared volume is less than 500 MCF.

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

This 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. In this case, this sudden and unexpected flaring occurred due to third party pipeline operator, Enterprise, whose downstream plant facility, were having compression equipment issues and it unexpectedly shut down, which in turn, caused the line pressure to spike extremely high, instigating Enterprise's ESD valve to close and therefore, immediately shut in Oxy's ability to push its gas into the Enterprise sales gas services system pipeline, four times in a 24-hour period. Enterprise, its plants, and associating processing facilities are downstream of Oxy's custody transfer point, yet Enterprise's unexpected ESD valve shut-in, on multiple occasions, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which in turn, then activated several occurrences of flaring at Oxy's upstream facility. Until Enterprise was able to handle the volume of gas sent to them, the constant shut-in of gas forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into a secondary offload operator. As soon as each flaring instance occurred, the facility's well optimizer very slowly adjusted injection rates and Oxy field personnel also shut-in several wells to cease flaring. The Cedar Canyon CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's Cedar Canyon area. The minimal amount of gas flow allowed to be flared was done out of necessity to protect personnel and equipment as a safeguard.

Start Time	End Time	Duration	MCF Flared
(1) 12:20 AM	12:40 AM	0 days 0 hrs 20 mins	23
(2) 02:15 AM	02:30 AM	0 days 0 hrs 15 mins	10
(3) 03:50 AM	04:20 AM	0 days 0 hrs 30 mins	89
(4) 05:35 AM	05:55 AM	0 days 0 hrs 20 mins	74

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, 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 gas compressor unit and/or multiple unit shutdown alarms, increased sensor pressure alarms, etc., field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible in order 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, this sudden and unexpected flaring occurred due to third party pipeline operator, Enterprise, whose downstream plant facility, were having compression equipment issues and it unexpectedly shut down, which in turn, caused the line pressure to spike extremely high, instigating Enterprise's ESD valve to close and therefore, immediately shut in Oxy's ability to push its gas into the Enterprise sales gas services system pipeline, four times in a 24-hour period. Enterprise, its plants, and associating processing facilities are downstream of Oxy's custody transfer point, yet Enterprise's unexpected ESD valve shut-in, on multiple occasions, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which in turn, then activated several occurrences of flaring at Oxy's upstream facility. Until Enterprise was able to handle the volume of gas sent to them, the constant shut-in of gas forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into a secondary offload operator. As soon as each flaring instance occurred, the facility's well optimizer very slowly adjusted injection rates and Oxy field personnel also shut-in several wells to cease flaring. The Cedar Canyon CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's Cedar Canyon area. The minimal amount of gas flow allowed to be flared was done out of necessity to protect personnel and equipment as a safeguard.

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

Oxy is limited in the 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, prevent from happening or reoccurring. Enterprise's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of 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. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enterprise personnel during these types of situations and when possible, engage in emergency alternative compression reaction strategies.

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 140012

DEFINITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	140012
	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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Phone:(505) 334-6178 Fax:(505) 334-6170 <u>District IV</u> 1220 S. St Francis Dr., Santa Fe, NM 87505

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

QUESTIONS

Action 140012

Phone:(505) 476-3470 Fax:(505) 476-3462		
٥	UESTIONS	
Operator: OXY USA INC		OGRID: 16696
P.O. Box 4294		Action Number:
Houston, TX 772104294		140012 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 wi	th the rest of the questions.
Incident Well	Not answered.	
Incident Facility	[fAPP2126642013] CEDAR	CANOYN GAS GATHERING
Determination of Reporting Requirements		
Answer all questions that apply. The Reason(s) statements are calculated based on your answers as). -
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 v	renting and/or flaring that is or ma	y 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	No	
watercourse, or otherwise, with reasonable probability, endanger public health, the environment or fresh water		
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 No	
	•	
Equipment Involved		
Primary Equipment Involved	Other (Specify)	
Additional details for Equipment Involved. Please specify	Emergency Flare > Downs	tream Activity > Enterprise > Plant Issues
Representative Compositional Analysis of Vented or Flared Natural Gas		
Please provide the mole percent for the percentage questions in this group.		
Methane (CH4) percentage	75	
Nitrogen (N2) percentage, if greater than one percent		
Hydrogen Sulfide (H2S) PPM, rounded up	0	
Carbon Dioxide (C02) percentage, if greater than one percent	0	
Oxygen (02) percentage, if greater than one percent	0	
If you are venting and/or flaring because of Pipeline Specification, please provide the required spec		
Methane (CH4) percentage quality requirement	Not answered.	
Nitrogen (N2) percentage quality requirement	Not answered.	
Hydrogen Sufide (H2S) PPM quality requirement	Not answered.	
Carbon Dioxide (C02) percentage quality requirement	Not answered.	

Not answered.

Oxygen (02) percentage quality requirement

District II
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QUESTIONS, Page 2

Action 140012

QUESTIONS (c	continued)
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Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	140012
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	08/21/2022
Time vent or flare was discovered or commenced	12:20 AM
Time vent or flare was terminated	01:45 AM
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: 196 Mcf Recovered: 0 Mcf Lost: 196 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	This reported event represents four (4) same-cause flaring occurrences within a 24-hr. period. Each occurrent listed below was caused by Enterprise, a third-party sale gas pipeline operator, whose downstream plant was having equipment issues. This event is not a major event as the combined flared volume is less than 500 MCF. In this case, this sudden and unexpected flaring occurred due to third party pipeline operator, Enterprise, whose downstream plant facility, were having compression equipment issues and it unexpectedly shut down, which in turn, caused the line pressure to spike extremely high, instigating Enterprise's ESD valve to close and therefore, immediately shut in Oxy's ability to push its gas into the Enterprise sales gas services system pipeline, four times in a 24-hour period. Enterprise, its plants, and associating processing facilities are downstream of Oxy's custody transfer point, yet Enterprise's unexpected ESD valve shut-in, on multiple occasions, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which in turn, then activated several occurrences of flaring at Oxy's upstream facility. Until Enterprise was able to handle the volume of gas sent to them, the constant shut-in of gas forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into a secondary offload operator. As soon as each flaring instance occurred, the facility's well optimizer very slowly adjusted injection rates and Oxy field personnel also shut-in several wells to cease flaring. The Cedar Canyon CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's Cedar Canyon area. The minimal amount of gas flow allowed to be flared was done out of necessity to protect personnel and equipment as a safeguard.	
Steps taken to limit the duration and magnitude of vent or flare	In this case, this sudden and unexpected flaring occurred due to third party pipeline operator, Enterprise, whose downstream plant facility, were having compression equipment issues and it unexpectedly shut down, which in turn, caused the line pressure to spike extremely high, instigating Enterprise's ESD valve to close and therefore, immediately shut in Oxy's ability to push its gas into the Enterprise sales gas services system pipeline, four times in a 24-hour period. Enterprise, its plants, and associating processing facilities are downstream of Oxy's custody transfer point, yet Enterprise's unexpected ESD valve shut-in, on multiple occasions, greatly impacted the gas flow from Oxy's upstream facility to their gas pipeline, which in turn, then activated several occurrences of flaring at Oxy's upstream facility. Until Enterprise was able to handle the volume of gas sent to them, the constant shut-in of gas forced Oxy's upstream facility to route its stranded gas to a flare, as it was not able to push all its gas into a secondary offload operator. As soon as each flaring instance occurred, the facility's well optimizer very slowly adjusted injection rates and Oxy field personnel also shut-in several wells to cease flaring. The Cedar Canyon CDP flare is a gas gathering flare system for multiple tank batteries across Oxy's Cedar Canyon area. The minimal amount of gas flow allowed to be flared was done out of necessity to protect personnel and equipment as a safeguard.	
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the 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, prevent from happening or reoccurring. Enterprise's downstream facilities and associated facilities, may have issues which will reoccur from time to time and may trigger a spike in their gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise has downstream activity issues or greatly struggles to handle the volume of gas being sent to them by Oxy, Enterprise then restricts Oxy's ability to send gas, which then prompts Oxy to route all of 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. The only actions that Oxy can take and handle that is within its control, is to keep continually communicate with Enterprise personnel during these types of situations and when possible, engage in emergency alternative compression reaction strategies.	

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ACKNOWLEDGMENTS

Action 140012

ACKNOWLEDGMENTS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	140012
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

V	I acknowledge that I am authorized to submit a Venting and/or Flaring (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.
V	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.
V	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.
V	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.
V	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 140012

CONDITIONS

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	140012
	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.	8/31/2022