Volumetrics Inc.
3710 East Rio Grande St, Victoria, TX-77901
Phone: 361-827-4024

Company:	OXY USA INC	**Work Order:**	4000535215
Field/Location :	NMSW	**Sampled by:**	OXY/JE
Station Name :	CEDAR CANYON TO ENTERPRISE	**Sample Type :**	SPOT-CYLINDER
Station Number :	NA	**Sample Temperature (F):**	NA
Sample Date:	3/10/22 2:40 PM	**Sample Pressure (PSIG):**	1237
Analysis Date:	3/17/22 8:30 PM	**Flow rate (MCF/Day):**	NA
Instrument:	INFICON	**Ambient Temperature (F):**	50
Calibration/Verification Date:	3/17/2022	**Sampling method:**	FILL & EMPTY
Heat Trace used:	YES	**Cylinder Number:**	27772

NATURAL GAS ANALYSIS: GPA 2261

Components	Un-Normalized Mol%	Normalized Mol%	GPM 14.650	GPM 14.730	GPM 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
Deann Friend
Laboratory Manager

UPSET VENT EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Cedar Canyon 28-4 CTB **Date:** 12/23/2022

Duration of event: 14 Hours 41 Minutes **MCF Vented:** 142

Start Time: 03:00 AM **End Time:** 05:41 PM

Cause: Venting > VRU > Malfunctions > Repairs

Method of Flared Gas Measurement: Estimated Vent Calculations

Comments:

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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 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Cimarron to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Cimarron technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service.

Venting Occurrences:

- 3:00 AM – 9:36 AM (67 MCF)
- 11:09 AM – 6:25 PM (67 MCF)
- 11:10 PM – 11:59 PM (8 MCF)

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no equipment issues, circumstances and/or assist other personnel on-site for maintenance/operational purposes. It is OXY's policy to route all stranded sales gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible, as part of the overall process or steps to take to limit duration and magnitude of venting. When flaring is not possible, and venting occurs and/or is discovered, 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. 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in

turn, immediately called for Cimarron to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Cimarron technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service. This incident was completely out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working quickly, safely and diligently.

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

Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of venting from vapor recovery units as notwithstanding proper VRU design and operation, various forms of mechanical, electrical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause venting malfunctions to occur without warning or advance notice. 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. Oxy has a strong and positive equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to continue with its equipment preventative maintenance program for all its facilities and continually work with its automation team to resolve equipment issues in a timely manner, should they occur suddenly and without warning.

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

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 180444
	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 180444

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 180444
	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	*Unavailable.*
Incident Facility	**[fAB1903734583] CEDAR CANYON 28-4 CTB**

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	Yes
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	Venting > VRU > Malfunctions > Repairs

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	1
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 specifications for each gas.	
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.*
Oxygen (02) percentage quality requirement	*Not answered.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 180444
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/23/2022
Time vent or flare was discovered or commenced	03:00 AM
Time vent or flare was terminated	05:41 PM
Cumulative hours during this event	15

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other | Other (Specify) | Natural Gas Vented | Released: 142 Mcf | Recovered: 0 Mcf | Lost: 142 Mcf.
Natural Gas Flared (Mcf) Details	*Not answered.*
Other Released Details	*Not answered.*
Additional details for Measured or Estimated Volume(s). Please specify	Estimated Vent Calculations
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 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Cimarron to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Cimarron technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walk-throughs to ensure that there are no equipment issues, circumstances and/or assist other personnel on-site for maintenance/operational purposes. It is OXY's policy to route all stranded sales gas to a flare, rather than vent, during an unforeseen and unavoidable emergency or malfunction, in order to minimize emissions as much as possible, as part of the overall process or steps to take to limit duration and magnitude of venting. When flaring is not possible, and venting occurs and/or is discovered, 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. 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 maintenance practices. In this case, VRU #1 malfunctioned several times due to operational issues and field personnel upon discovery of the VRU's malfunctioning, which caused unexpected venting to occur, then in turn, immediately called for Cimarron to dispatch a technician. Unfortunately, due to extreme weather conditions, a technician was unable to arrive in a timely manner due to extreme weather conditions affecting the area and additional operators in the area requiring the same equipment mechanical assistance. Once the Cimarron technician arrived on-site, the tech was able to quickly resolve the issues brought it back to working order. Venting ceased soon after the VRU reached maximized operating service. This incident was completely out of OXY's control to prevent from happening yet OXY made every effort to control and minimize emissions as much as possible during this event by working safely.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	Oxy is limited in the corrective actions to eliminate this type of cause and potential reoccurrence of venting from vapor recovery units as notwithstanding proper VRU design and operation, various forms of mechanical, electrical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause venting malfunctions to occur without warning or advance notice. 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. Oxy has a strong and positive equipment preventative maintenance program in place. The only actions that Oxy can take and handle that is within its control, is to continue with its equipment preventative maintenance program for all its facilities and continually work with its automation team to resolve equipment issues in a timely manner, should they occur suddenly and without warning.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 180444
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	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.
☑	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

Action 180444

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 180444
	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.	1/29/2023