



## Volumetrics Inc.

3710 East Rio Grande St, Victoria, TX-77901

Phone: 361-827-4024

**Company:** OXY USA INC  
**Field/Location :** NMSW  
**Station Name :** DIMENSIONS CTB TRAIN 1 CHECK  
**Station Number :** 18521C  
**Sample Date:** 4/6/22 11:00 AM  
**Analysis Date:** 4/13/22 1:25 PM  
**Instrument:** VARIAN- CP 4900 GC  
**Calibration/Verification Date:** 4/12/2022  
**Heat Trace used:** YES

**Work Order:** 4000551929  
**Sampled by:** OXY/JE  
**Sample Type :** SPOT-CYLINDER  
**Sample Temperature (F):** 81  
**Sample Pressure (PSIG):** 76  
**Flow rate (MCF/Day):** 19759.9  
**Ambient Temperature (F):** 53  
**Sampling method:** FILL & EMPTY  
**Cylinder Number:** 27746

## NATURAL GAS ANALYSIS: GPA 2261

| Components         | Un-Normalized<br>Mol% | Normalized<br>Mol% | GPM<br>14.650 | GPM<br>14.730 | GPM<br>15.025 |
|--------------------|-----------------------|--------------------|---------------|---------------|---------------|
| Hydrogen Sulfide   | 0.0000                | 0.0000             |               |               |               |
| Nitrogen           | 1.6778                | 1.7092             |               |               |               |
| Methane            | 74.5445               | 75.9409            |               |               |               |
| Carbon Dioxide     | 1.7368                | 1.7693             |               |               |               |
| Ethane             | 10.9843               | 11.1901            | 2.987         | 3.003         | 3.063         |
| Propane            | 5.3008                | 5.4001             | 1.485         | 1.493         | 1.523         |
| Isobutane          | 0.6800                | 0.6927             | 0.226         | 0.227         | 0.232         |
| N-butane           | 1.6650                | 1.6962             | 0.534         | 0.537         | 0.547         |
| Isopentane         | 0.3972                | 0.4046             | 0.148         | 0.148         | 0.151         |
| N-Pentane          | 0.4579                | 0.4665             | 0.169         | 0.170         | 0.173         |
| Hexanes(C6's)      | 0.3123                | 0.3182             | 0.131         | 0.131         | 0.134         |
| Heptanes (C7's)    | 0.2557                | 0.2605             | 0.120         | 0.121         | 0.123         |
| Octanes (C8's)     | 0.1124                | 0.1145             | 0.059         | 0.059         | 0.060         |
| Nonanes Plus (C9+) | 0.0365                | 0.0372             | 0.021         | 0.021         | 0.021         |
| <b>Total</b>       | <b>98.1612</b>        | <b>100.0000</b>    |               |               |               |

## Physical Properties (Calculated)

|                                   | 14.650 psia | 14.730 psia | 15.025 psia |
|-----------------------------------|-------------|-------------|-------------|
| Total GPM Ethane+                 | 5.879       | 5.910       | 6.027       |
| Total GPM Iso-Pentane+            | 0.647       | 0.650       | 0.662       |
| Compressibility (Z)               | 0.9962      | 0.9962      | 0.9961      |
| Specific Gravity ( Air=1) @ 60 °F | 0.7593      | 0.7593      | 0.7594      |
| Molecular Weight                  | 21.917      | 21.917      | 21.917      |

## Gross Heating Value

|                                   | 14.650 psia | 14.730 psia | 15.025 psia |
|-----------------------------------|-------------|-------------|-------------|
| Dry, Real (BTU/Ft <sup>3</sup> )  | 1253.7      | 1260.6      | 1285.9      |
| Wet, Real (BTU/Ft <sup>3</sup> )  | 1231.8      | 1238.5      | 1263.4      |
| Dry, Ideal (BTU/Ft <sup>3</sup> ) | 1249.0      | 1255.8      | 1280.9      |
| Wet, Ideal (BTU/Ft <sup>3</sup> ) | 1227.1      | 1233.8      | 1258.5      |

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:** Dimension 6 CTB**Flare Date:** 02/06/2023**Duration of event:** 35 Minutes**MCF Flared:** 120**Start Time:** 05:45 AM**End Time:** 06:20 AM**Cause:** Emergency Flare > Third Party Downstream Activity > Enterprise > Emergency Shutdown**Method of Flared Gas Measurement:** Gas Flare Meter**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 interruption, restriction or complete shut-in of a gas pipeline by a third-party pipeline compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.

**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, 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. As soon as flaring was triggered, the facility's mitigation optimizer cut 30,000 injection rates to wells in the field to reduce injection and sales gas. In addition, as soon as flaring alarms were received by field personnel, they began to shut-in several wells to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible.

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

Oxy is unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. 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 continually communicate with Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.

**District I**  
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Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
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**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
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**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 188984

DEFINITIONS

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                        |
|                                                                    | Action Number:<br>188984                               |
|                                                                    | Action Type:<br>[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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QUESTIONS

Action 188984

**QUESTIONS**

|                                                                    |                                                     |
|--------------------------------------------------------------------|-----------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID: 16696                                        |
|                                                                    | Action Number: 188984                               |
|                                                                    | 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                                                                                                                                                      | Unavailable.                     |
| Incident Facility                                                                                                                                                  | [fAPP2126637631] DIMENSION 6 CTB |

|                                                                                                                                                                                                                                                                                            |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <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 within 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 > Third Party Downstream Activity > Enterprise > Emergency Shutdown |

|                                                                                                                               |               |
|-------------------------------------------------------------------------------------------------------------------------------|---------------|
| <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                                                                         | 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. |

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QUESTIONS, Page 2

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QUESTIONS (continued)

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
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|                                                                    | Action Number:<br>188984                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

QUESTIONS

|                                                |            |
|------------------------------------------------|------------|
| Date(s) and Time(s)                            |            |
| Date vent or flare was discovered or commenced | 02/06/2023 |
| Time vent or flare was discovered or commenced | 05:45 AM   |
| Time vent or flare was terminated              | 06:20 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: 120 Mcf   Recovered: 0 Mcf   Lost: 120 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 compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction o=complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. This event could not have been foreseen, avoided or prevented from happening as this event occurred with no advance notice or warning to Oxy and its field personnel from Enterprise.                       |
| 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, 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, Enterprise, third party owned and operated downstream pipeline operator, had an unplanned downstream compressor station shutdown, which then instigated a sudden and unexpected restrictions of gas flow intake of their sales gas pipeline, which in turn, prompted Oxy's upstream facility to pressure up automatically and trigger flaring to occur. As soon as flaring was triggered, the facility's mitigation optimizer cut 30,000 injection rates to wells in the field to reduce injection and sales gas. In addition, as soon as flaring alarms were received by field personnel, they began to shut-in several wells to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the CTB to cease flaring. This event is out of OXY's control, yet OXY made every effort to control and minimize emissions as much as possible. |
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare                                                | Oxy is unable to take any corrective actions to eliminate the cause and potential reoccurrence of a downstream third-party owned and operated sales gas pipeline's sudden and unexpected gas flow intake restriction or shut-in, as this control issue is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. 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 continually communicate with Enterprise personnel, who own and operate the sales gas pipeline, when possible, during these types of circumstances.                                                                |

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ACKNOWLEDGMENTS

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|                                                                    | Action Number:<br>188984                               |
|                                                                    | Action Type:<br>[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 188984

CONDITIONS

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
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|                                                                    | Action Number:<br>188984                               |
|                                                                    | Action Type:<br>[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. | 2/21/2023      |