



## Certificate of Analysis

Number: 6030-22090406-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Sep. 28, 2022

Field: Red Tank  
Station Name: Red Tank 27-28 CTB Check  
Station Number: 16200C  
Station Location: CTB  
Sample Point: Meter run  
Formation: Monthly  
County: Eddy, NM  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge  
Sampling Company: : SPL

Sampled By: Raul Salazar  
Sample Of: Gas Spot  
Sample Date: 09/26/2022  
Sample Conditions: 80 psig, @ 95.05 °F Ambient: 89 °F  
Effective Date: 09/26/2022  
PO/Ref. No: 4500934807  
Method: GPA-2261M  
Cylinder No: 1111-006946  
Instrument: 70104251 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 09/20/2022 0:00 AM  
Analyzed: 09/28/2022 14:19:37 by EBH

## Analytical Data

| Components       | Un-normalized<br>Mol % | Mol. %   | Wt. %   | GPM at<br>14.65 psia |
|------------------|------------------------|----------|---------|----------------------|
| Hydrogen Sulfide | NIL                    | 0.00050  | 0.001   |                      |
| Nitrogen         | 1.994                  | 1.99935  | 2.435   |                      |
| Carbon Dioxide   | 2.141                  | 2.14646  | 4.107   |                      |
| Methane          | 71.991                 | 72.19178 | 50.350  |                      |
| Ethane           | 12.011                 | 12.04395 | 15.744  | 3.216                |
| Propane          | 6.716                  | 6.73490  | 12.911  | 1.853                |
| Iso-Butane       | 0.852                  | 0.85457  | 2.159   | 0.279                |
| n-Butane         | 2.185                  | 2.19098  | 5.536   | 0.690                |
| Iso-Pentane      | 0.463                  | 0.46419  | 1.456   | 0.170                |
| n-Pentane        | 0.527                  | 0.52807  | 1.656   | 0.191                |
| Hexanes          | 0.322                  | 0.32240  | 1.208   | 0.132                |
| Heptanes         | 0.302                  | 0.30314  | 1.321   | 0.140                |
| Octanes          | 0.178                  | 0.17860  | 0.887   | 0.091                |
| Nonanes Plus     | 0.041                  | 0.04111  | 0.229   | 0.023                |
|                  | 99.723                 | 100.0000 | 100.000 | 6.785                |

## Calculated Physical Properties

|                             |        |        |
|-----------------------------|--------|--------|
| Calculated Molecular Weight | Total  | C9+    |
| Compressibility Factor      | 23.00  | 128.26 |
| Relative Density Real Gas   | 0.9958 |        |
|                             | 0.7972 | 4.4283 |

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

|                                     |        |        |
|-------------------------------------|--------|--------|
| Real Gas Dry BTU                    | 1298.1 | 6974.4 |
| Water Sat. Gas Base BTU             | 1276.0 | 6852.4 |
| Ideal, Gross HV - Dry at 14.65 psia | 1292.7 | 6974.4 |
| Ideal, Gross HV - Wet               | 1270.1 | 6852.4 |

Comments: H<sub>2</sub>S Field Content 5 ppm

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

**UPSET FLARING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility:** Red Tank 27-28 CTB**Flare Date:** 04/09/2023**Duration of event:** 2 Hours 50 Minutes**MCF Flared:** 783**Start Time:** 05:50 PM**End Time:** 08:40 PM**Cause:** Emergency Flare > Severe Weather > Lighting > Third Party Power Provider > Substation Power Outage > Facility Power Outage > Emergency Shut Down**Method of Flared Gas Measurement:** Gas Flare Meter**Comments:** This upset event was not caused by any wells associated with the facility.

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

This 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. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, this was a sudden and unexpected emergency shutdown of the facility due to a third-party provider power outage caused by severe weather and lightning resulting from a severe storm in the area, which triggered flaring to occur. Xcel's Sage Brush power substation lost power as a result of the severe weather affecting the area. This event could not have been avoided or prevented from happening as Oxy takes every preventative measure necessary to weather-protect its equipment and facility as much as possible, but power outages are out of Oxy's control. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible during a power outage.

**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 in order to lessen emissions as much as possible. In this case, this was a sudden and unexpected emergency shutdown of the facility, due to a third-party provider power outage caused by severe weather and lightning resulting from a storm in the area, which triggered flaring to occur. This event could not have been avoided or prevented from happening as Oxy takes every preventative measure necessary to weather-protect its equipment and facility as much as possible, but power outages are out of Oxy's control. Oxy production techs, who were in the area, quickly noticed flaring occurring and immediately began communication with additional field personnel to manually shut-in more than twenty + high producing wells to cease flaring. Due to the severe weather and lightning, this took some time as Oxy personnel must proceed cautiously. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible during a power outage. The facility was running and operating normally without

issues prior to the power outage occurring, which in turn prompted flaring to occur. All Oxy field personnel during this event worked diligently to ensure the facility was returned to normal operations once power restored, including having a compressor mechanic dispatched to assist with restarting compression equipment. Oxy field personnel were able to restart all facility equipment without further issues. As a precaution, Oxy production techs remained on-site until they were assured that no further issues would occur with the facility's operational equipment as a result of the area's severe weather and power outage.

### **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 flaring from sudden and unexpected weather-related power outages as even with the best planning, unforeseen problems can arise during severe weather events, which can and will be beyond Oxy's ability to control. 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 keep continue with its weather-related preventive measures for this facility, accordingly.

**District I**  
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**District II**  
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**District IV**  
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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 210593

DEFINITIONS

|                                                                    |                                                               |
|--------------------------------------------------------------------|---------------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                               |
|                                                                    | Action Number:<br>210593                                      |
|                                                                    | Action Type:<br>[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: <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 210593

QUESTIONS

|                                                                    |                                                               |
|--------------------------------------------------------------------|---------------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                               |
|                                                                    | Action Number:<br>210593                                      |
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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 | [16696] OXY USA INC                 |
| Incident Type     | Flare                               |
| Incident Status   | Closure Not Approved                |
| Incident Well     | Unavailable.                        |
| Incident Facility | [fAPP2127030589] RED TANK 27-28 CTB |

*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 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, major 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 <b>at least 50 MCF</b> 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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence                                                                                                             | No  |

**Equipment Involved**

|                                                           |                                                                                                                                                  |
|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Primary Equipment Involved                                | Other (Specify)                                                                                                                                  |
| Additional details for Equipment Involved. Please specify | Emergency Flare > Severe Weather > Lighting > Third Party Power Provider > Substation Power Outage > Facility Power Outage > Emergency Shut Down |

**Representative Compositional Analysis of Vented or Flared Natural Gas**  
*Please provide the mole percent for the percentage questions in this group.*

|                                                              |    |
|--------------------------------------------------------------|----|
| Methane (CH4) percentage                                     | 72 |
| Nitrogen (N2) percentage, if greater than one percent        | 2  |
| Hydrogen Sulfide (H2S) PPM, rounded up                       | 0  |
| Carbon Dioxide (C02) 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 Sufide (H2S) PPM quality requirement       | Not answered. |
| Carbon Dioxide (C02) percentage quality requirement | Not answered. |
| Oxygen (O2) percentage quality requirement          | Not answered. |

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QUESTIONS, Page 2

Action 210593

QUESTIONS (continued)

|                                                                        |                                                                   |
|------------------------------------------------------------------------|-------------------------------------------------------------------|
| Operator:<br><br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br><br>16696                                               |
|                                                                        | Action Number:<br><br>210593                                      |
|                                                                        | Action Type:<br><br>[C-129] Amend Venting and/or Flaring (C-129A) |
|                                                                        |                                                                   |

QUESTIONS

| Date(s) and Time(s)                            |            |
|------------------------------------------------|------------|
| Date vent or flare was discovered or commenced | 04/09/2023 |
| Time vent or flare was discovered or commenced | 05:50 PM   |
| Time vent or flare was terminated              | 08:40 PM   |
| Cumulative hours during this event             | 3          |

| 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: 783 Mcf   Recovered: 0 Mcf   Lost: 783 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            | 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 |               |
| 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 | False                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Please explain reason for why this event was beyond this operator's control                                                     | This 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. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. In this case, this was a sudden and unexpected emergency shutdown of the facility due to a third-party provider power outage caused by severe weather and lightning resulting from a severe storm in the area, which triggered flaring to occur. Xcel's Sage Brush power substation lost power as a result of the severe weather affecting the area. This event could not have been avoided or prevented from happening as Oxy takes every preventative measure necessary to weather-protect its equipment and facility as much as possible, but power outages are out of Oxy's control. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible during a power outage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 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. In this case, this was an sudden and unexpected emergency shutdown of the facility, due to a third-party provider power outage caused by severe weather and lightning resulting from a storm in the area, which triggered flaring to occur. This event could not have been avoided or prevented from happening as Oxy takes every preventative measure necessary to weather-protect its equipment and facility as much as possible, but power outages are out of Oxy's control. Oxy production techs, who were in the area, quickly noticed flaring occurring and immediately began communication with additional field personnel to manually shut-in more than twenty + high producing wells to cease flaring. Due to the severe weather and lightning, this took some time as Oxy personnel must proceed cautiously. This event is out of OXY's control yet, OXY made every effort to control and minimize emissions as much as possible during a power outage. The facility was running and operating normally without issues prior to the power outage occurring, which in turn prompted flaring to occur. All Oxy field personnel during this event worked diligently to ensure the facility was returned to normal operations once power restored, including having a compressor mechanic dispatched to assist with restarting compression equipment. Oxy field personnel were able to restart all facility equipment without further issues. |
| 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 flaring from sudden and unexpected weather-related power outages as even with the best planning, unforeseen problems can arise during severe weather events, which can and will be beyond Oxy's ability to control. 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 keep continue with its weather-related preventive measures for this facility, accordingly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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ACKNOWLEDGMENTS

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**ACKNOWLEDGMENTS**

|                                     |                                                                                                                                                                                                                                                                                                     |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | 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.                                                                                                                |
| <input checked="" type="checkbox"/> | 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.                                                                                 |
| <input checked="" type="checkbox"/> | 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.                                                                         |
| <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 210593

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|                                                                    |                                                               |
|--------------------------------------------------------------------|---------------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                               |
|                                                                    | Action Number:<br>210593                                      |
|                                                                    | Action Type:<br>[C-129] Amend Venting and/or Flaring (C-129A) |

CONDITIONS

| Created By | Condition                                                                                                                                                                                  | Condition Date |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| marialuna2 | 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. | 4/25/2023      |