Certificate of Analysis

Number: 6030-22030084-001A

Artesia Laboratory
200 E Main St.
Artesia, NM 88210
Phone 575-746-3481

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

Mar. 07, 2022

Field:	Platinum	Sampled By:	Michael Mirabal
Station Name:	Platinum CTB Train 2	Sample Of:	Gas Spot
Station Number:	17422c	Sample Date:	03/03/2022 11:26
Sample Point:	Meter	Sample Conditions:	11081 psig
Meter Number:		Effective Date:	03/03/2022 11:26
County:	Eddy	Method:	GPA-2261M
Type of Sample:	Spot-Cylinder	Cylinder No:	1111-003938
Heat Trace Used:	N/A	Instrument:	70142339 (Inficon GC-MicroFusion)
Sampling Method:	Fill and Purge	Last Inst. Cal.:	03/07/2022 0:00 AM
Sampling Company:	OXY	Analyzed:	03/07/2022 12:28:38 by ERG

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Hydrogen Sulfide	NIL	NIL	NIL	
Nitrogen	2.103	2.11939	2.618	
Carbon Dioxide	5.154	5.19486	10.083	
Methane	72.601	73.18069	51.776	
Ethane	10.387	10.46946	13.884	2.795
Propane	5.175	5.21583	10.143	1.434
Iso-Butane	0.667	0.67223	1.723	0.220
n-Butane	1.637	1.64967	4.229	0.519
Iso-Pentane	0.389	0.39201	1.247	0.143
n-Pentane	0.422	0.42557	1.354	0.154
Hexanes	0.282	0.28415	1.080	0.117
Heptanes	0.240	0.24222	1.070	0.112
Octanes	0.124	0.12509	0.630	0.064
Nonanes Plus	0.029	0.02883	0.163	0.016
	99.210	100.00000	100.000	5.574

Calculated Physical Properties	Total	C9+
Calculated Molecular Weight	22.67	128.26
Compressibility Factor	0.9962	
Relative Density Real Gas	0.7856	4.4283
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1201.5	6974.4
Water Sat. Gas Base BTU	1181.0	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1197.0	6974.4
Ideal, Gross HV - Wet	1176.0	6852.4

Comments: H2S Field Content 0 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: Platinum NC 34 CTB

Flare Date: 07/21/2024

Duration of Event: 6 Hours 50 Minutes

MCF Flared: 639

Start Time: 12:20 AM

End Time: 07:10 AM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise Compressor Station > Equipment Issues

Method of Flared Gas Measurement: Gas Flare Meter

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 compressor station, third party owned and operated downstream facility, had a sudden and unexpected ESD due to severe weather in the area affecting their facilities, which in turn shut them down, which then prompted high line pressure to occur, which then caused the field to pressure up automatically and trigger flaring to occur at the Platinum NC 34 CTB. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning.

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 compressor station, third party owned and operated downstream facility, had a sudden and unexpected ESD due to severe weather in the area affecting their facilities, which in turn shut them down, which then prompted high line pressure to occur, which then caused the field to pressure up automatically and trigger flaring to occur at the Platinum NC 34 CTB. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning and the amount the of gas the Platinum CTB processes, the immediate spike in field pressure did not allow Oxy to take precautions to limit its emissions. As soon as flaring was triggered, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with activating storage wells and began to shut-in several wells to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the facility, which took some time to do. 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 gas plant's issues, as this is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise operations will have issues which may reoccur from time to time and may trigger a spike in the gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise's facilities have equipment 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 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 operate the sales gas pipeline, when possible, during these types of circumstances.

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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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 370851
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

DEFINITIONS

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:

- this application's operator, hereinafter "this operator";
- venting and/or flaring, hereinafter "vent or flare";
- any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";
- the statements in (and/or attached to) this, hereinafter "the statements in this";
- and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 370851

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 370851
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Prerequisites	
Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.	
Incident ID (n#)	*Unavailable.*
Incident Name	*Unavailable.*
Incident Type	**Flare**
Incident Status	*Unavailable.*
Incident Facility	**[fAPP2126657589] PLATINUM 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 addional guidance.	
Was this vent or flare caused by an emergency or malfunction	Yes
Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event	No
Is this considered a submission for a vent or flare event	**Yes, 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 **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	Emergency Flare > Third Party Downstream Activity > Enterprise Compressor Station > Equipment Issues

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	73
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	5
Oxygen (02) percentage, if greater than one percent	0
If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.	
Methane (CH4) percentage quality requirement	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sufide (H2S) PPM quality requirement	0
Carbon Dioxide (C02) percentage quality requirement	0
Oxygen (02) percentage quality requirement	0

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 370851
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	07/21/2024
Time vent or flare was discovered or commenced	12:20 AM
Time vent or flare was terminated	07:10 AM
Cumulative hours during this event	7

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: 639 MCF | Recovered: 0 MCF | Lost: 639 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	
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, 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 compressor station, third party owned and operated downstream facility, had a sudden and unexpected ESD due to severe weather in the area affecting their facilities, which in turn shut them down, which then prompted high line pressure to occur, which then caused the field to pressure up automatically and trigger flaring to occur at the Platinum NC 34 CTB. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning.
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Steps taken to limit the duration and magnitude of vent or flare	weather in the area affecting their facilities, which in turn shut them down, which then prompted high line pressure to occur, which then caused the field to pressure up automatically and trigger flaring to occur at the Platinum NC 34 CTB. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning and the amount the of gas the Platinum CTB processes, the immediate spike in field pressure did not allow Oxy to take precautions to limit its emissions. As soon as flaring was triggered, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with activating storage wells and began to shut-in several wells to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the facility, which took some time to do. 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 gas plant's issues, as this is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid, prevent from happening or reoccur. Enterprise operations will have issues which may reoccur from time to time and may trigger a spike in the gas line pressure, which in turn, directly impacts Oxy's ability to send gas to them. When Enterprise's facilities have equipment 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 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 operate the sales gas pipeline, when possible, during these types of circumstances.

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ACKNOWLEDGMENTS

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	Action Number: 370851
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

ACKNOWLEDGMENTS

☑	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
☑	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
☑	I hereby certify the statements in this amending report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
☑	I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.
☑	I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.

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CONDITIONS

Action 370851

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 370851
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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.	8/6/2024