



Certificate of Analysis

Number: 6030-23010206-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Jan. 19, 2023

Field:	Sand Dunes NC	Sampled By:	Scott Beasley
Station Name:	Sand Dunes NC West CGL Fuel Skid Inlet	Sample Of:	Gas Spot
Station Number:		Sample Date:	01/17/2023
Station Location:	Comp	Sample Conditions:	1169.2 psig, @ 60 °F Ambient: 64 °F
Sample Point:	meter	Effective Date:	01/17/2023
Formation:	Spot	Method:	GPA-2261M
County:	Eddy, NM	Cylinder No:	1111-002251
Type of Sample:	Spot-Cylinder	Instrument:	70104251 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	12/19/2022 0:00 AM
Sampling Method:	Fill and Purge	Analyzed:	01/19/2023 07:21:05 by EBH
Sampling Company:	SPL		

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Nitrogen	1.359	1.36124	1.731	
Carbon Dioxide	1.112	1.11369	2.225	
Methane	73.802	73.90705	53.837	
Ethane	13.106	13.12514	17.920	3.504
Propane	6.790	6.79931	13.614	1.870
Iso-Butane	0.812	0.81326	2.146	0.266
n-Butane	1.912	1.91423	5.052	0.602
Iso-Pentane	0.345	0.34549	1.132	0.126
n-Pentane	0.341	0.34129	1.118	0.123
Hexanes	0.138	0.13780	0.539	0.057
Heptanes	0.089	0.08933	0.406	0.041
Octanes	0.037	0.03735	0.194	0.019
Nonanes Plus	0.015	0.01482	0.086	0.008
	99.858	100.00000	100.000	6.616

Calculated Physical Properties

	Total	C9+
Calculated Molecular Weight	22.02	128.26
Compressibility Factor	0.9961	
Relative Density Real Gas	0.7631	4.4283

GPA 2172 Calculation:

Calculated Gross BTU per ft³ @ 14.65 psia & 60°F

Real Gas Dry BTU	1282.0	6974.4
Water Sat. Gas Base BTU	1260.1	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1277.0	6974.4
Ideal, Gross HV - Wet	1254.7	6852.4

Hydrocarbon Laboratory Manager

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

UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM**Facility:** North Corridor 28 West CGL**Vent Date:** 06/25/2024**Duration of Event:** 4 Hours**MCF Vented:** 91 MCF**Start Time:** 01:10 PM**End Time:** 05:10 PM**Cause:** Venting > LP VRU #3 > O2 in Gas Sales System**Method of Vented Gas Measurement:** Estimated Vent Calculations

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

In this case, it was determined that there were higher than tolerable limits of oxygen, where were being detected in the central gas sales system. This created a safety need to shut off emissions equipment in order to identify and mitigate the oxygen source, which was difficult to determine and ultimately was a result of a mechanical failure. This event could not have been prevented as it was not expected for venting to occur.

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

In this case, it was determined that there were higher than tolerable limits of oxygen, where were being detected in the central gas sales system. This created a safety need to shut off emissions equipment in order to identify and mitigate the oxygen source, which was difficult to initially determine and ultimately was a result of a mechanical failure. The steps taken to limit the duration and magnitude of venting during this event was to call for a mechanic to be dispatched to assist in locating the oxygen source. Once the mechanic arrived on-site, the plan of action was to initially shut off the vapor recovery equipment and stage them to brought back online at intervals associated with effective troubleshooting methods to determine oxygen sources. As equipment locations were eliminated as oxygen sources, varying equipment was left on and in normal operations to prevent additional fugitive emissions from occurring. Once the oxygen source was determined to be emitting from an unexpected malfunction from VRU unit # 3, repairs were done. Once repairs were complete, tanks were able to return to zero emissions tolerance pressures. This event could not have been prevented as it was not expected for venting to occur.

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

In this case, there are no actions to take to eliminate the cause and reoccurrence of venting as a result of a sudden and unexpected case of oxygen being in the sales systems as a result of a malfunctioning VRU.

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Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
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 372385

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 372385
	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 372385

QUESTIONS

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	Action Number: 372385
	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	Vent
Incident Status	Unavailable.
Incident Facility	[fAPP2213360068] NORTH CORRIDOR 28 WEST CGL
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, 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 > LP VRU #3 > O2 in Gas Sales System

Representative Compositional Analysis of Vented or Flared Natural Gas Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	74
Nitrogen (N2) percentage, if greater than one percent	1
Hydrogen Sulfide (H2S) PPM, rounded up	0
Carbon Dioxide (CO2) percentage, if greater than one percent	1
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	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sufide (H2S) PPM quality requirement	0
Carbon Dioxide (CO2) percentage quality requirement	0
Oxygen (O2) percentage quality requirement	0

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QUESTIONS, Page 2

Action 372385

QUESTIONS (continued)

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	16696
	Action Number:
	372385
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	06/25/2024
Time vent or flare was discovered or commenced	01:10 PM
Time vent or flare was terminated	05:10 PM
Cumulative hours during this event	4

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other Other (Specify) Natural Gas Vented Released: 91 MCF Recovered: 0 MCF Lost: 91 MCF.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Not answered.
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	No
Downstream OGRID that should have notified this operator	0
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	In this case, it was determined that there were higher than tolerable limits of oxygen, where were being detected in the central gas sales system. This created a safety need to shut off emissions equipment in order to identify and mitigate the oxygen source, which was difficult to determine and ultimately was a result of a mechanical failure. This event could not have been prevented as it was not expected for venting to occur.
Steps taken to limit the duration and magnitude of vent or flare	In this case, it was determined that there were higher than tolerable limits of oxygen, where were being detected in the central gas sales system. This created a safety need to shut off emissions equipment in order to identify and mitigate the oxygen source, which was difficult to initially determine and ultimately was a result of a mechanical failure. The steps taken to limit the duration and magnitude of venting during this event was to call for a mechanic to be dispatched to assist in locating the oxygen source. Once the mechanic arrived on-site, the plan of action was to initially shut off the vapor recovery equipment and stage them to be brought back online at intervals associated with effective troubleshooting methods to determine oxygen sources. As equipment locations were eliminated as oxygen sources, varying equipment was left on and in normal operations to prevent additional fugitive emissions from occurring. Once the oxygen source was determined to be emitting from an unexpected malfunction from VRU unit # 3, repairs were done. Once repairs were complete, tanks were able to return to zero emissions tolerance pressures. This event could not have been

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Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	In this case, there are no actions to take to eliminate the cause and reoccurrence of venting as a result of a sudden and unexpected case of oxygen being in the sales systems as a result of a malfunctioning VRU.

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ACKNOWLEDGMENTS

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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

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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.	8/9/2024