

## Certificate of Analysis

Number: 6030-23030373-001A

**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. 31, 2023

Sampled By: Field: PERMIAN RESOURCES Raul Salazar Station Name: Precious CTB Train 2 Check (FMP) Sample Of: Gas Spot Station Number: 17622C Sample Date: 03/23/2023

Station Location: OP-DELSE-BT001 Sample Conditions: 120 psig, @ 102.4 °F Ambient: 75 °F

03/23/2023 Sample Point: Meter Effective Date: **NEW\_MEXICO** GPA-2261M Formation: Method:

1111-007922 County: Cylinder No:

Spot-Cylinder Type of Sample: : Instrument: 70104251 (Inficon GC-MicroFusion)

Heat Trace Used: N/A Last Inst. Cal.: 03/27/2023 0:00 AM

Sampling Method: : Fill and Purge Analyzed: 03/30/2023 14:16:51 by EBH Sampling Company: :SPL

## **Analytical Data**

Components U	Jn-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
	14101 /0			14.00 psia
Nitrogen	0.934	0.94910	1.124	
Carbon Dioxide	0.139	0.14102	0.262	
Methane	69.687	70.85133	48.039	
Ethane	13.882	14.11402	17.937	3.771
Propane	7.677	7.80521	14.546	2.148
Iso-Butane	1.009	1.02627	2.521	0.336
n-Butane	2.519	2.56141	6.292	0.807
Iso-Pentane	0.579	0.58908	1.796	0.215
n-Pentane	0.666	0.67672	2.064	0.245
Hexanes	0.466	0.47389	1.726	0.195
Heptanes	0.454	0.46179	1.956	0.213
Octanes	0.267	0.27177	1.312	0.139
Nonanes Plus	0.077	0.07839	0.425	0.044
	98.356	100.00000	100.000	8.113
Calculated Physical Pro	operties	Tota		C9+
Calculated Molecular We	eight	23.66	6	128.26
Compressibility Factor		0.9953	3	
Relative Density Real Ga	as	0.8205	5	4.4283
<b>GPA 2172 Calculation:</b>				
Calculated Gross BTU	per ft <sup>3</sup> @ 14.65 ps	sia & 60°F		
Real Gas Dry BTU		1402.1		6974.4
Water Sat. Gas Base BT		1378.1		6852.4
Ideal, Gross HV - Dry at	14.65 psia	1395.4		6974.4
Ideal, Gross HV - Wet		1371.0	)	6852.4
Comments: Lease# NN	MWM021640			

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: Precious CTB Flare Date: 12/02/2024

**Duration of event:** 1 Hour 29 Minutes **MCF Flared:** 128

Start Time: 09:50 PM End Time: 10:40 PM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise > Central Station > Emergency

Shutdown

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, had continuing equipment issues on their end at their Central Station, which in turn caused them to restrict their intake gas service capacity, suddenly and unexpectedly to Oxy, which in turn caused Oxy to have trouble with gas takeaway, which then triggered a flaring event to occur when gas backed up. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning from Enterprise Gas Control or their field personnel regarding issues at their Central Station facility. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.

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

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walkthroughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. 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, had continuing equipment issues on their end at their Central Station, which in turn caused them to restrict their intake gas service capacity, suddenly and unexpectedly to Oxy, which in turn caused Oxy to have trouble with gas takeaway, which then triggered a flaring event to occur when gas backed up. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning from Enterprise Gas Control or their field personnel regarding issues at their Central Station facility. Oxy personnel received a high-pressure alarm from the flare, before flaring was immediately triggered. As soon as flaring was triggered, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with ensuring field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area. In addition, several high GOR wells, were choked back to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the Precious CTB. 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 plants and/or associated downstream facility 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 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 and/or gas plants has 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 own and operate the sales gas pipeline, when possible, during these types of circumstances.

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory <a href="https://www.emnrd.nm.gov/ocd/contact-us">https://www.emnrd.nm.gov/ocd/contact-us</a>

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

DEFINITIONS

Action 413720

### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	413720
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

### **DEFINITIONS**

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

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

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

QUESTIONS

Action 413720

Q	UESTIONS		
Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294		OGRID: 16696 Action Number: 413720	
		Action Type:  [C-129] Venting and/or Flaring (C-129)	
QUESTIONS			
Prerequisites			
Any messages presented in this section, will prevent submission of this application. Please resolve	these issues before continuing wi	th the rest of the questions.	
Incident Well	Unavailable.		
Incident Facility	[fAPP2126657195] PRECIOUS CTB		
Data-main efficience of Deposition Deposition manufactures			
Determination of Reporting Requirements  Answer all questions that apply. The Reason(s) statements are calculated based on your answers at	nd may provide addional quidance		
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 v  Was there at least 50 MCF of natural gas vented and/or flared during this event		v be a major or minor release under 19.15.29.7 NMAC.	
	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)		
Timaly Equipment involved	Other (Specify)		
Additional details for Equipment Involved. Please specify	Emergency Flare > Third P Emergency Shutdown	arty Downstream Activity > Enterprise > Central Station >	
Representative Compositional Analysis of Vented or Flared Natural Gas			
Please provide the mole percent for the percentage questions in this group.	1		
Methane (CH4) percentage	71		
Nitrogen (N2) percentage, if greater than one percent	1		
Hydrogen Sulfide (H2S) PPM, rounded up	0		
Carbon Dioxide (C02) percentage, if greater than one percent	0		
Oxygen (02) percentage, if greater than one percent	0		
If you are venting and/or flaring because of Pipeline Specification, please provide the required spec	ifications for each gas.		
Methane (CH4) percentage quality requirement	Not answered.		
Nitrogen (N2) percentage quality requirement	Not answered.		
Hydrogen Sufide (H2S) PPM quality requirement	Not answered.		
Carbon Dioxide (C02) percentage quality requirement	Not answered.		
Oxygen (02) percentage quality requirement	Not answered.		

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

QUESTIONS, Page 2

Action 413720

QUEST	ONS (continued)
Operator:	OGRID:
OXY USA INC P.O. Box 4294	16696 Action Number:
Houston, TX 772104294	413720
	Action Type:  [C-129] Venting and/or Flaring (C-129)
QUESTIONS	
Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/02/2024
Time vent or flare was discovered or commenced	09:50 PM
Time vent or flare was terminated	10:40 PM
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: 128 Mcf   Recovered: 0 Mcf   Lost: 128 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 Eleving Beauting from Dougetreem Activity	
Venting or Flaring Resulting from Downstream Activity	T
Was this vent or flare a result of downstream activity	Yes
Was notification of downstream activity received by this operator	No Control of the Con
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 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, had continuing equipment issues on their end at their Central Station, which in turn caused them to restrict their intake gas service capacity, suddenly and unexpectedly to Oxy, which in turn caused Oxy to have trouble with gas takeaway, which then triggered a flaring event to occur when gas backed up. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning from Enterprise Gas Control or their field personnel regarding issues at their Central Station facility. This flaring situation was beyond OXY's control, but Oxy took all possible

This facility is unmanned, except when Oxy production techs are gathering data daily or conducting daily walkthroughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction,

measures to reduce emissions effectively.

•	
Steps taken to limit the duration and magnitude of vent or flare	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, had continuing equipment issues on their end at their Central Station, which in turn caused them to restrict their intake gas service capacity, suddenly and unexpectedly to Oxy, which in turn caused Oxy to have trouble with gas takeaway, which then triggered a flaring event to occur when gas backed up. This event could not have been foreseen, avoided, or prevented from happening as this event occurred with no advance notice or warning from Enterprise Gas Control or their field personnel regarding issues at their Central Station facility. Oxy personnel received a high-pressure alarm from the flare, before flaring was immediately triggered. As soon as flaring was triggered, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and assisted with ensuring field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area. In addition, several high GOR wells, were choked back to assist with reducing field pressure so that it would stay below the flare trigger setpoints of the Precious CTB. 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 plants and/or associated downstream facility 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 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 and/or gas plants has 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 own and operate the sales gas pipeline, when possible, during these types of circumstances.

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ACKNOWLEDGMENTS

Action 413720

## **ACKNOWLEDGMENTS**

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OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	413720
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

## **ACKNOWLEDGMENTS**

V	I acknowledge that I am authorized to submit a Venting and/or Flaring (C-129) report on behalf of this operator and understand that this report can be a complete C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
V	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.
V	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.
V	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.
V	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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Action 413720

### **CONDITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	413720
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

### CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	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.	12/18/2024