



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

Field: PERMIAN_RESOURCES
Station Name: Precious CTB Train 2 Check (FMP)
Station Number: 17622C
Station Location: OP-DELSE-BT001
Sample Point: Meter
Formation: NEW_MEXICO
County:
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: 03/23/2023
Sample Conditions: 120 psig, @ 102.4 °F Ambient: 75 °F
Effective Date: 03/23/2023
Method: GPA-2261M
Cylinder No: 1111-007922
Instrument: 70104251 (Inficon GC-MicroFusion)
Last Inst. Cal.: 03/27/2023 0:00 AM
Analyzed: 03/30/2023 14:16:51 by EBH

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 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 Properties

	Total	C9+
Calculated Molecular Weight	23.66	128.26
Compressibility Factor	0.9953	
Relative Density Real Gas	0.8205	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1402.1	6974.4
Water Sat. Gas Base BTU	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# NMWM021640

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 NC 31 CTB**Flare Date:** 12/14/2024**Duration of Event:** 9 Hours 5 Minutes**MCF Flared:** 578**Start Time:** 11:35 AM**End Time:** 08:40 PM**Cause:** Emergency Flare > Downstream Activity > Enterprise > Orla Gas Plant**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 instance, Enterprise, a third-party downstream operator, conducted maintenance work at their Orla plant. This maintenance unexpectedly resulted in several instances of sudden restrictions in their intake gas service capacity from Oxy. Consequently, Oxy experienced challenges with gas takeaway, leading to brief intermittent flaring incidents over several hours due to the gas backup because of Enterprise's work. This event was unforeseen and unavoidable, occurring without prior notice or warning from Enterprise Gas Control or their field personnel about maintenance work being performed at their Orla plant, leading to a disruption of the gas service.

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. In this instance, Enterprise, a third-party downstream operator, conducted maintenance work at their Orla plant. This maintenance unexpectedly resulted in several instances of sudden restrictions in their intake gas service capacity from Oxy. Consequently, Oxy experienced challenges with gas takeaway, leading to brief intermittent flaring incidents over several hours due to the gas backup because of Enterprise's work. As soon as flaring was triggered in each instance, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and quickly had the optimizer cut injection rates to wells. Once pressure stayed below the facility's flare trigger setpoints, did flaring cease during each intermittent instance. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring. This process allows us to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not Oxy's preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.

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. When Enterprise has plant or 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
<https://www.emnrd.nm.gov/ocd/contact-us>

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

DEFINITIONS

Action 415634

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 415634
	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 415634

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 415634
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Prerequisites <i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident ID (n#)	Unavailable.
Incident Name	Unavailable.
Incident Type	Flare
Incident Status	Unavailable.
Incident Facility	[fAPP2126657195] PRECIOUS 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 <i>Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide additional guidance.</i>	
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	Yes
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 within 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 > Downstream Activity > Enterprise > Orla Gas Plant

Representative Compositional Analysis of Vented or Flared Natural Gas <i>Please provide the mole percent for the percentage questions in this group.</i>	
Methane (CH4) percentage	71
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	0
Oxygen (O2) percentage, if greater than one percent	0
<i>If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.</i>	
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

Action 415634

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/14/2024
Time vent or flare was discovered or commenced	11:35 AM
Time vent or flare was terminated	08:40 PM
Cumulative hours during this event	9

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: 578 Mcf Recovered: 0 Mcf Lost: 578 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 instance, Enterprise, a third-party downstream operator, conducted maintenance work at their Orla plant. This maintenance unexpectedly resulted in several instances of sudden restrictions in their intake gas service capacity from Oxy. Consequently, Oxy experienced challenges with gas takeaway, leading to brief intermittent flaring incidents over several hours due to the gas backup because of Enterprise's work. This event was unforeseen and unavoidable, occurring without prior notice or warning from Enterprise Gas Control or their field personnel about maintenance work being performed at their Orla plant, leading to a disruption of the gas service. 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 instance, Enterprise, a third-party downstream operator,

Steps taken to limit the duration and magnitude of vent or flare	conducted maintenance work at their Orla plant. This maintenance unexpectedly resulted in several instances of sudden restrictions in their intake gas service capacity from Oxy. Consequently, Oxy experienced challenges with gas takeaway, leading to brief intermittent flaring incidents over several hours due to the gas backup because of Enterprise's work. As soon as flaring was triggered in each instance, field personnel engaged in Oxy's third party pipeline operation curtailment reactive stratagems and quickly had the optimizer cut injection rates to wells. Once pressure stayed below the facility's flare trigger setpoints, did flaring cease during each intermittent instance. To mitigate the risks associated with overpressure and to ensure the safety of our operations, we have had to resort to controlled and safety flaring. This process allows us to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not Oxy's preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.
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. When Enterprise has plant or 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

☒	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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Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 415634
	Action Type: [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.	12/29/2024