

## 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 Sampled By: 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

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

County: Cylinder No: 1111-007922

Type of Sample: : Spot-Cylinder 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	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 P		Tota	I	C9+
Calculated Molecular W	Veight	23.66		128.26
Compressibility Factor		0.9953		
Relative Density Real C		0.8205	5	4.4283
<b>GPA 2172 Calculation</b>				
Calculated Gross BTU	J per ft³ @ 14.65 ps			
Real Gas Dry BTU		1402.1		6974.4
Water Sat. Gas Base B		1378.1		6852.4
Ideal, Gross HV - Dry a	at 14.65 psia	1395.4		6974.4
Ideal, Gross HV - Wet		1371.0	)	6852.4
Comments: Lease# N	NMWM021640			

Last Bulgo

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: Precious NC 31 CTB Vent Date: 12/14/2024

**Duration of Event:** 9 Hours 5 Minutes **MCF Vented:** 95

Start Time: 11:35 AM End Time: 08:40 PM

**Cause:** Intermittent Venting > Downstream Activity > Enterprise > Orla Gas Plant

Method of Vented Gas Measurement: Allocated Calculations

### 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 venting incidents over several hours due to the gas backup to the VRU's 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 and causing venting to occur.

## 2. Steps Taken to limit duration and magnitude of venting or 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 venting incidents over several hours due to the gas backup to the VRU's because of Enterprise's work. This venting 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 experiences plant or equipment issues or cannot handle the gas volume from Oxy, it restricts Oxy's gas flow. This forces Oxy to flare or vent stranded gas. 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 415635

#### **DEFINITIONS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	415635
	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 415635

Q	UESTIONS	
Operator:		OGRID:
OXY USA INC P.O. Box 4294		16696 Action Number:
Houston, TX 772104294		415635
		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 wit	h the rest of the questions.
Incident Well	Unavailable.	
Incident Facility	[fAPP2126657195] PRECIO	DUS CTB
Determination of Reporting Requirements		
Answer all questions that apply. The Reason(s) statements are calculated based on your answers are		
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, 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	enting 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 <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		stream Activity > Enterprise > Orla Gas Plant
Representative Compositional Analysis of Vented or Flared Natural Gas		
Please provide the mole percent for the percentage questions in this group.		
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		
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 415635

Santa	Fe, NM 8/505
QUEST	ONS (continued)
Operator: OXY USA INC	OGRID: 16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	415635
	Action Type:  [C-129] Venting and/or Flaring (C-129)
QUESTIONS	
Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/14/2024
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
	L '
Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	Cause: Other   Other (Specify)   Natural Gas Vented   Released: 95 Mcf   Recovered: 0 Mcf   Lost: 95 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Allocated Vent Calculations
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	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 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 venting incidents over several hours due to the gas backup to the VRU's 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 heing performed at their Orla plant. leading to a

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challenges with gas takeaway, leading to brief intermittent venting incidents over several

Steps taken to limit the duration and magnitude of vent or flare

	hours due to the gas backup to the VRU's because of Enterprise's work. This venting 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 experiences plant or equipment issues or cannot handle the gas volume from Oxy, it restricts Oxy's gas flow. This forces Oxy to flare or vent stranded gas. 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 415635

#### **ACKNOWLEDGMENTS**

Operator:	OGRID:
OXY USA INC	16696
P.O. Box 4294	Action Number:
Houston, TX 772104294	415635
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

#### ACKNOWLEDGMENTS

V	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (C-129) report on behalf of this operator and understand that this report can be <b>a complete</b> 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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Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 415635

#### **CONDITIONS**

Operator:	OGRID:
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P.O. Box 4294	Action Number:
Houston, TX 772104294	415635
	Action Type:
	[C-129] Venting and/or Flaring (C-129)

#### CONDITIONS

Created By	Condition	Condition Date
marialuna2	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.	12/29/2024