



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:** 12/18/2024**Duration of Event:** 2 Hours 47 Minutes**MCF Flared:** 120**Start Time:** 02:33 PM**End Time:** 05:20 PM**Cause:** Emergency Flare > Equipment Malfunction > VRU**Method of Flared Gas Measurement:** Gas Flare Meter

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

The emissions were caused by the sudden, unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and maintenance practices. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. In this case, the facility's high pressure VRU's malfunctioned due to an unknown root cause. The Oxy production technician, attempted to troubleshoot the VRU to determine cause, but was unable to do so, and requested a VRU mechanic be dispatched to resolve the issue, when the VRU continued to function, but alarms kept going off. Brief intermittent instances of flaring occurred when the third party VRU mechanic from Cimmaron, arrived to resolve and fix the VRU issue. 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..

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 walk-throughs 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, as the part of the overall process or steps to take to limit duration and magnitude of flaring. Oxy personnel are in the field 24/7 and can physically see when we are flaring which in turn are communicated to additional Oxy field personnel. Internal OXY procedures ensure that upon notice or communication of flaring, field production technician personnel are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. Oxy production technicians must assess whether the issue or circumstance is due to damage and repair is needed, or whether there are other reasons for its cause. 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 case, the facility's high pressure VRU's malfunctioned due to an unknown root cause. The Oxy production technician, attempted to troubleshoot the VRU to determine cause, but was unable to do so, and requested a VRU mechanic be dispatched to resolve the issue, when the VRU continued to function, but alarms kept going off. During the process of identifying the cause of the alarm malfunctions, the Cimmaron mechanic needed to

review, inspect, shut down, and restart the unit multiple times. There were brief intermittent instances of flaring when the third-party VRU mechanic from Cimmaron periodically shut down the unit to perform the repair work. Unable to identify an exact root cause for the malfunction alarms, the Cimmaron VRU mechanic replaced all components they deemed necessary to stop the malfunction alarms from being triggered. The minimal amount of gas flow allowed to be flare was done out of necessity to protect personnel and equipment as a safeguard.

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

Oxy is limited in its corrective actions to eliminate the cause and potential reoccurrence of a malfunctioning VRU, as notwithstanding proper VRU, design and operation, whether low- or high-pressure, various forms of mechanical or technical issues can be sudden, reasonably unforeseeable and unexpected which can cause equipment malfunctions to occur without warning or advance notice, especially during severe weather conditions. OXY makes every effort to control and minimize emissions as much as possible during these circumstances. The limited actions that Oxy can do in this circumstance is to submit a work order for repair, work with its equipment maintenance team to have the issue resolved in a timely manner and continue monitoring the equipment until its repair and restoration to normal operations is complete.

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 416237

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 416237
	Action Type: [C-129] Venting and/or Flaring (C-129)

DEFINITIONS

<p>For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application:</p> <ul style="list-style-type: none">• 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 416237

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 416237
	Action Type: [C-129] Venting and/or Flaring (C-129)

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 Well	Unavailable.
Incident Facility	[fAPP2126657195] PRECIOUS CTB

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	No
Is this considered a submission for a vent or flare event	Yes, minor venting and/or flaring of natural gas.
<i>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.</i>	
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 > Equipment Malfunction > VRU

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 416237

QUESTIONS (continued)

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	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	12/18/2024
Time vent or flare was discovered or commenced	02:33 PM
Time vent or flare was terminated	05:20 PM
Cumulative hours during this event	3

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: 120 Mcf Recovered: 0 Mcf Lost: 120 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	No
Was notification of downstream activity received by this operator	Not answered.
Downstream OGRID that should have notified this operator	Not answered.
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 were caused by the sudden, unavoidable breakdown of equipment or process that was beyond the owner/operator's control and did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and maintenance practices. Internal Oxy procedures ensure that upon a sudden and unexpected flaring event, production techs are promptly notified, and are instructed to assess the issue as soon as possible to take prompt corrective action and minimize emissions. In this case, the facility's high pressure VRU's malfunctioned due to an unknown root cause. The Oxy production technician, attempted to troubleshoot the VRU to determine cause, but was unable to do so, and requested a VRU mechanic be dispatched to resolve the issue, when the VRU continued to function, but alarms kept going off. Brief intermittent instances of flaring occurred when the third party VRU mechanic from Cimmaron, arrived to resolve and fix the VRU issue. 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.
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ACKNOWLEDGMENTS

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	Action Number: 416237
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ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	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 a complete C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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 416237

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 416237
	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.	1/1/2025