



## Certificate of Analysis

Number: 6030-23120311-001A

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. 11, 2024

Field: PERMIAN\_RESOURCES  
Station Name: Sand Dunes CTB Check  
Station Number: 17000C  
Station Location: OP-L0901-BT002  
Sample Point: Meter  
Formation: NEW\_MEXICO  
County:  
Well Name: CTB  
Type of Sample: : Spot-Cylinder  
Heat Trace Used: N/A  
Sampling Method: : Fill and Purge  
Sampling Company: : OXY

Sampled By: JE  
Sample Of: Gas Spot  
Sample Date: 12/28/2023 09:20  
Sample Conditions: 88 psig, @ 68 °F Ambient: 31 °F  
Effective Date: 12/28/2023 09:20  
Flow Rate: 17996 MSCFD  
Method: GPA-2261M  
Cylinder No: 5030-01063  
Instrument: 70104251 (Inficon GC-MicroFusion)  
Last Inst. Cal.: 01/09/2024 0:00 AM  
Analyzed: 01/09/2024 08:30:50 by EBH

## Analytical Data

| Components       | Un-normalized<br>Mol % | Mol. %   | Wt. %    | GPM at<br>14.65 psia |
|------------------|------------------------|----------|----------|----------------------|
| Hydrogen Sulfide | 0.0000                 | 0.0000   | 0.0000   |                      |
| Nitrogen         | 1.2725                 | 1.3037   | 1.5990   |                      |
| Carbon Dioxide   | 0.5710                 | 0.5850   | 1.1272   |                      |
| Methane          | 70.6744                | 72.4044  | 50.8552  |                      |
| Ethane           | 12.9937                | 13.3118  | 17.5248  | 3.555                |
| Propane          | 7.3509                 | 7.5308   | 14.5390  | 2.072                |
| Iso-Butane       | 0.8677                 | 0.8889   | 2.2620   | 0.290                |
| n-Butane         | 2.1166                 | 2.1684   | 5.5180   | 0.683                |
| Iso-Pentane      | 0.4679                 | 0.4794   | 1.5143   | 0.175                |
| n-Pentane        | 0.5187                 | 0.5314   | 1.6786   | 0.192                |
| Hexanes          | 0.3367                 | 0.3449   | 1.3013   | 0.142                |
| Heptanes         | 0.2976                 | 0.3049   | 1.3376   | 0.140                |
| Octanes          | 0.1258                 | 0.1289   | 0.6447   | 0.066                |
| Nonanes Plus     | 0.0170                 | 0.0175   | 0.0983   | 0.010                |
|                  | 97.6105                | 100.0000 | 100.0000 | 7.325                |

|                                       |              |            |
|---------------------------------------|--------------|------------|
| <b>Calculated Physical Properties</b> | <b>Total</b> | <b>C9+</b> |
| Calculated Molecular Weight           | 22.84        | 128.26     |
| Compressibility Factor                | 0.9957       |            |
| Relative Density Real Gas             | 0.7917       | 4.4283     |

## GPA 2172 Calculation:

Calculated Gross BTU per ft<sup>3</sup> @ 14.65 psia & 60°F

|                                     |        |        |
|-------------------------------------|--------|--------|
| Real Gas Dry BTU                    | 1340.5 | 6974.4 |
| Water Sat. Gas Base BTU             | 1317.6 | 6852.4 |
| Ideal, Gross HV - Dry at 14.65 psia | 1334.7 | 6974.4 |
| Ideal, Gross HV - Wet               | 1311.4 | 6852.4 |

**Comments:** H2S Field Content 0 ppm  
FMP/LSE NM40659

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:** Sand Dunes South Corridor**Vent Date:** 02/01/2025**Duration of Event:** 24 Hours**MCF Vented:** 182**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Equipment Malfunction > Third Party Owned Compressor > Skid Compression > Faulty Pressure Relief Valve Seal**Method of Gas Measurement:** Allocated Calculation

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

This emissions event was caused by the unforeseen, unexpected, sudden, and 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. 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. This venting leak event occurred due to an unforeseen malfunction of a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group. Upon discovering the venting leak during a recent drone flyover survey, Oxy operations and field personnel swiftly identified and halted the venting by immediately shutting down the malfunctioning compression unit. This unit will remain inactive until NGSG can troubleshoot and resolve the issue with the pressure relief valve seal. Despite facility routine checks by field personnel at various times, this venting issue was not identified or able to be detected during their facility inspections.

Once the venting leak was identified and stopped, Oxy's Operations group then transitioned its attention on conducting an extensive review to determine a venting release timeframe. Operations personnel determined that the venting leak was isolated to a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group and determined the venting occurred from January 26, 2025, to February 03, 2025. While not certain, Operations personnel used best engineering and previous gas estimates to determine venting release estimates and timeframe. Based on previous gas estimates, historical production, and pressure records, it is possible that a total of 1,386 MCF of gas may have potentially vented over nine (9) days.

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

This emissions event was caused by the unforeseen, unexpected, sudden, and 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. 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. This venting leak event occurred due to an unforeseen malfunction of a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group. Upon discovering the venting leak during a recent drone flyover survey, Oxy operations and field personnel swiftly identified and halted the venting by immediately shutting down the malfunctioning compression unit. This unit will remain inactive until NGSG can troubleshoot and resolve the

issue with the pressure relief valve seal. Despite facility routine checks by field personnel at various times, this venting issue was not identified or able to be detected during their facility inspections. 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 limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of compressor malfunctions from third party owned equipment, as notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur, thereby, triggering the unit's sensors to automatically shut down the unit to avoid catastrophic damage to the internal engine components. Oxy continually strives to maintain and operate all its equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place. In such situations, OXY's sole course of action is to collaborate with the third-party compression owner to address and resolve the malfunction issues as promptly as feasible.

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

General Information  
Phone: (505) 629-6116

Online Phone Directory  
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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

DEFINITIONS

Action 429722

DEFINITIONS

|                                                                        |                                                            |
|------------------------------------------------------------------------|------------------------------------------------------------|
| Operator:<br><br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br><br>16696                                        |
|                                                                        | Action Number:<br><br>429722                               |
|                                                                        | Action Type:<br><br>[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"><li>• this application's operator, hereinafter "this operator";</li><li>• venting and/or flaring, hereinafter "vent or flare";</li><li>• any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms";</li><li>• the statements in (and/or attached to) this, hereinafter "the statements in this";</li><li>• and the past tense will be used in lieu of mixed past/present tense questions and statements.</li></ul> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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QUESTIONS

Action 429722

**QUESTIONS**

|                                                                    |                                                        |
|--------------------------------------------------------------------|--------------------------------------------------------|
| Operator:<br>OXY USA INC<br>P.O. Box 4294<br>Houston, TX 772104294 | OGRID:<br>16696                                        |
|                                                                    | Action Number:<br>429722                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

**QUESTIONS**

|                                                                                                                                                                                                   |                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <b>Prerequisites</b><br><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                                                                                                                                                                                 | [fAPP2127048458] Sand Dunes South Corridor CTB |

|                                                                                                                                                                                                                                                                                            |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>Determination of Reporting Requirements</b><br><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, 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 <b>at least 50 MCF</b> 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 within 300 feet from an occupied permanent residence, school, hospital, institution or church in existence                                                                                                              | No                                                |

|                                                           |                                                                                                             |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Equipment Involved</b>                                 |                                                                                                             |
| Primary Equipment Involved                                | Other (Specify)                                                                                             |
| Additional details for Equipment Involved. Please specify | Equipment Malfunction > Third Party Owned Compressor > Skid Compression > Faulty Pressure Relief Valve Seal |

|                                                                                                                                                                    |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Representative Compositional Analysis of Vented or Flared Natural Gas</b><br><i>Please provide the mole percent for the percentage questions in this group.</i> |               |
| Methane (CH4) percentage                                                                                                                                           | 72            |
| 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             |
| <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 429722

**QUESTIONS (continued)**

|                                                                    |                                                        |
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|                                                                    | Action Number:<br>429722                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

**QUESTIONS**

| Date(s) and Time(s)                            |            |
|------------------------------------------------|------------|
| Date vent or flare was discovered or commenced | 02/01/2025 |
| Time vent or flare was discovered or commenced | 12:00 AM   |
| Time vent or flare was terminated              | 11:59 PM   |
| Cumulative hours during this event             | 24         |

| Measured or Estimated Volume of Vented or Flared Natural Gas              |                                                                                                             |
|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Natural Gas Vented (Mcf) Details                                          | Cause: Other   Other (Specify)   Natural Gas Vented   Released: 182 Mcf   Recovered: 0 Mcf   Lost: 182 Mcf. |
| Natural Gas Flared (Mcf) Details                                          | Not answered.                                                                                               |
| Other Released Details                                                    | Not answered.                                                                                               |
| Additional details for Measured or Estimated Volume(s). Please specify    | Allocated Calculation                                                                                       |
| 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                                                      | <p>This emissions event was caused by the unforeseen, unexpected, sudden, and 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 preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. 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. This venting leak event occurred due to an unforeseen malfunction of a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group. Upon discovering the venting leak during a recent drone flyover survey, Oxy operations and field personnel swiftly identified and halted the venting by immediately shutting down the malfunctioning compression unit. This unit will remain inactive until NGSG can troubleshoot and resolve the issue with the pressure relief valve seal. Despite facility routine checks by field personnel at various times, this venting issue was not identified or able to be detected during their facility inspections. Once the venting leak was identified and stopped, Oxy's Operations group then transitioned its attention on conducting an extensive review to determine a venting release timeframe. Operations personnel determined that the venting leak was isolated to a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group and determined the venting occurred from January 26, 2025, to February 03, 2025. While not certain, Operations</p> |

|                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                   | personnel used best engineering and previous gas estimates to determine venting release estimates and tim                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Steps taken to limit the duration and magnitude of vent or flare                  | <p>This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond the owner/operator's control an/d did not stem from activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventative maintenance practices. Oxy engages in respectable and good facility operation practices while also maintaining its continuous facility equipment preventative maintenance program. 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. This venting leak event occurred due to an unforeseen malfunction of a pressure relief valve that did not seal on a skid compression unit, owned and maintained by NGSG Compression Group. Upon discovering the venting leak during a recent drone flyover survey, Oxy operations and field personnel swiftly identified and halted the venting by immediately shutting down the malfunctioning compression unit. This unit will remain inactive until NGSG can troubleshoot and resolve the issue with the pressure relief valve seal. Despite facility routine checks by field personnel at various times, this venting issue was not identified or able to be detected during their facility inspections. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.</p> |
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare | <p>Oxy is limited in the corrective actions available to them to eliminate the cause and potential reoccurrence of compressor malfunctions from third party owned equipment, as notwithstanding compressor engine design and operation, compressors are inherently dynamic and even the smallest alarms, false or true, can be sudden, reasonably unforeseeable and unexpected which can cause compression malfunctions to occur, thereby, triggering the unit's sensors to automatically shut down the unit to avoid catastrophic damage to the internal engine components. Oxy continually strives to maintain and operate all its equipment in a manner consistent with good practices for minimizing emissions and reducing the number of emission events. Oxy has a strong and positive equipment preventative maintenance program in place. In such situations, OXY's sole course of action is to collaborate with the third-party compression owner to address and resolve the malfunction issues as promptly as feasible.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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ACKNOWLEDGMENTS

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|                                                                    | Action Number:<br>429722                               |
|                                                                    | Action Type:<br>[C-129] Venting and/or Flaring (C-129) |

**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 <b>complete</b> 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 429722

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|                                                                    |                                                        |
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|                                                                    | Action Number:<br>429722                               |
|                                                                    | Action Type:<br>[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. | 2/7/2025       |