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	Sampled By:	JE
Station Name:	Sand Dunes CTB Check	Sample Of:	Gas Spot
Station Number:	17000C	Sample Date:	12/28/2023 09:20
Station Location:	OP-L0901-BT002	Sample Conditions:	88 psig, @ 68 °F Ambient: 31 °F
Sample Point:	Meter	Effective Date:	12/28/2023 09:20
Formation:	NEW_MEXICO	Flow Rate:	17996 MSCFD
County:		Method:	GPA-2261M
Well Name:	CTB	Cylinder No:	5030-01063
Type of Sample: :	Spot-Cylinder	Instrument:	70104251 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	01/09/2024 0:00 AM
Sampling Method: :	Fill and Purge	Analyzed:	01/09/2024 08:30:50 by EBH
Sampling Company: :	OXY		

Analytical Data

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

Calculated Physical Properties	Total	C9+
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 ft³ @ 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:** 02/02/2025

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

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 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.

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 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.

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
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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 429603
	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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QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 429603
	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 with the rest of the questions.	
Incident Well	*Unavailable.*
Incident Facility	**[fAPP2127048458] Sand Dunes South Corridor CTB**

Determination of Reporting Requirements	
Answer all questions that apply. The Reason(s) statements are calculated based on your answers and may provide addional guidance.	
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 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 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	Equipment Malfunction > Third Party Owned Compressor > Skid Compression > Faulty Pressure Relief Valve Seal

Representative Compositional Analysis of Vented or Flared Natural Gas	
Please provide the mole percent for the percentage questions in this group.	
Methane (CH4) percentage	72
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	1
Oxygen (02) percentage, if greater than one percent	0
If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.	
Methane (CH4) percentage quality requirement	*Not answered.*
Nitrogen (N2) percentage quality requirement	*Not answered.*
Hydrogen Sufide (H2S) PPM quality requirement	*Not answered.*
Carbon Dioxide (C02) percentage quality requirement	*Not answered.*
Oxygen (02) percentage quality requirement	*Not answered.*

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 429603
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	02/02/2025
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	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. 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 tim
Steps taken to limit the duration and magnitude of vent or flare	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.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	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.

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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 429603
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

☑	I acknowledge that I am authorized to submit a *Venting and/or Flaring* (C-129) report on behalf of this operator and understand that this report can be **a complete** C-129 submission per 19.15.27.8 and 19.15.28.8 NMAC.
☑	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.
☑	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.
☑	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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 429603
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	If the information provided in this report requires an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	2/7/2025