



Certificate of Analysis

Number: 6030-23020156-001A

Artesia Laboratory

200 E Main St.
Artesia, NM 88210
Phone 575-746-3481Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Feb. 16, 2023

Field:	Mesa Verde	Sampled By:	Raul Salazar
Station Name:	Mesa Verde CTB Check 2	Sample Of:	Gas Spot
Station Number:	15500D	Sample Date:	02/08/2023
Station Location:	CTB	Sample Conditions:	100 psig, @ 74.2 °F Ambient: 60 °F
Sample Point:	Meter	Effective Date:	02/08/2023
Formation:	Monthly	Method:	GPA-2261M
County:	Lea, NM	Cylinder No:	1111-007610
Type of Sample:	Spot-Cylinder	Instrument:	70104251 (Inficon GC-MicroFusion)
Heat Trace Used:	N/A	Last Inst. Cal.:	02/14/2023 0:00 AM
Sampling Method:	Fill and Purge	Analyzed:	02/16/2023 08:35:27 by EBH
Sampling Company:	SPL		

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia
Nitrogen	1.055	1.07848	1.318	
Carbon Dioxide	4.247	4.34006	8.330	
Methane	70.693	72.23909	50.544	
Ethane	11.464	11.71486	15.363	3.128
Propane	6.276	6.41282	12.333	1.764
Iso-Butane	0.844	0.86276	2.187	0.282
n-Butane	1.905	1.94686	4.935	0.613
Iso-Pentane	0.425	0.43399	1.366	0.158
n-Pentane	0.434	0.44328	1.395	0.160
Hexanes	0.250	0.25547	0.960	0.105
Heptanes	0.169	0.17270	0.755	0.080
Octanes	0.069	0.07051	0.351	0.036
Nonanes Plus	0.029	0.02912	0.163	0.016
	97.860	100.00000	100.000	6.342

Calculated Physical Properties

	Total	C9+
Calculated Molecular Weight	22.93	128.26
Compressibility Factor	0.9960	
Relative Density Real Gas	0.7946	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1254.2	6974.4
Water Sat. Gas Base BTU	1232.8	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1249.2	6974.4
Ideal, Gross HV - Wet	1227.3	6852.4

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 Id#** fAPP2126659618**Operator:** OXY USA, Inc.**Facility:** Mesa Verde 18 CTB**Flare Date:** 04/13/2025**Duration of Event:** 3 Hours 59 Minutes**MCF Flared:** 1401**Start Time:** 08:00 PM**End Time:** 11:59 PM**Cause:** Emergency Flare > Downstream Activity > MPLX > Intake Gas Flow Restrictions > Sales Valve Communication Failure**Method of Flared Gas Measurement:** Gas Flare Meter**1. Reason why this event was beyond Operator's control:**

The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction, or complete shut-in of a gas pipeline by a third-party pipeline compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction, or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventive maintenance practices. In this case, Enlink, third-party operated downstream pipeline operator, suddenly and unexpectedly had an emergency shutdown, which affected Oxy operations, as they were having compression equipment issues at their Rico station, which in turn prompted high line pressure to occur, which then triggered a flaring event to occur. Oxy is unable to predict or anticipate when Enlink will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done. This event could not have been foreseen, avoided, or prevented from happening as it occurred with no advance notice or warning. Prior to the flaring incident occurring, all OXY operations and facility machinery were operating at peak optimization levels. To mitigate the risks associated with overpressure and to ensure the safety of our operations, Oxy had to resort to controlled flaring. This process allows OXY to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not our preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. This event is out of OXY's control. OXY made every effort to control and minimize emissions as much as possible. If prior notification was made to Oxy personnel, field and operation personnel would have adjusted and balanced the wells to reduce the amount of gas being sent to the facility and to sales, which in turn would have mitigated the chance of a flaring event occurring. This flaring situation was beyond OXY's control, but Oxy took all possible measures to reduce emissions effectively.

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

It is OXY's policy to route its stranded gas to a flare during an unforeseen and unavoidable emergency or malfunction, that is beyond Oxy's control to avoid, prevent or foresee, to minimize emissions as much as possible as part of the overall steps taken to limit duration and magnitude of flaring. The flare at this facility has 98% combustion efficiency to lessen emissions as much as possible. In this case, Enlink, third-party operated downstream pipeline operator, suddenly and unexpectedly had an emergency shutdown, which affected Oxy operations, as they were having compression equipment issues at their Rico station, which in turn prompted high line pressure to occur, which then triggered a flaring event to occur. Oxy is unable to predict or anticipate when Enlink will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done. This event could not have been foreseen, avoided, or prevented from happening

as it occurred with no advance notice or warning. Prior to the flaring incident occurring, all OXY operations and facility machinery were operating at peak optimization levels. To mitigate the risks associated with overpressure and to ensure the safety of our operations, Oxy had to resort to controlled flaring. This process allows OXY to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not our preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. As soon as flaring was triggered, Oxy production techs choked back several wells and the field area's mitigation optimizers cut injection rates to wells in the field to reduce injection and sales gas across the area so that field pressure would stay below the flare trigger setpoints of the facility to cease flaring. 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 unable to rectify or prevent future incidents of MPLX gas flow pipeline restrictions or closures because these issues occur beyond Oxy's transfer point, putting them outside of Oxy's ability to control or mitigate. The downstream assets of MPLX, along with their related gas processing plants and operating personnel, occasionally face recurring equipment malfunctions. These incidents can repeat sporadically, which in turn, potentially causes surges to happen in their pipeline pressure which directly affect Oxy's capacity to push forward its sales gas to these downstream operators and their facilities. If MPLX encounters problems with downstream operations or faces difficulties managing the large amounts of gas supplied by Oxy, MPLX abruptly and without warning constrains Oxy's capacity to send gas. This compels Oxy to divert any of its excess gas that cannot be channeled into the pipeline to flaring. OXY takes all possible measures to reduce emissions effectively. Oxy continuously stresses to MPLX staff the crucial importance of advanced communication in situations like these, since it's the one actionable step they can take under such conditions.

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 460669

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 460669
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

DEFINITIONS

For the sake of brevity and completeness, please allow for the following in all groups of questions and for the rest of this application: • this application's operator, hereinafter "this operator"; • venting and/or flaring, hereinafter "vent or flare"; • any notification or report(s) of the C-129 form family, hereinafter "any C-129 forms"; • the statements in (and/or attached to) this, hereinafter "the statements in this"; • and the past tense will be used in lieu of mixed past/present tense questions and statements.

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QUESTIONS

Action 460669

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 460669
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Prerequisites	
<i>Any messages presented in this section, will prevent submission of this application. Please resolve these issues before continuing with the rest of the questions.</i>	
Incident ID (n#)	Unavailable.
Incident Name	Unavailable.
Incident Type	Flare
Incident Status	Unavailable.
Incident Facility	[fAPP2126659618] MESA VERDE 18 CTB
<i>Only valid Vent, Flare or Vent with Flaring incidents (selected above in the Application Details section) that are assigned to your current operator can be amended with this C-129A application.</i>	

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, major 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 within 300 feet from an occupied permanent residence, school, hospital, institution or church in existence	No

Equipment Involved	
Primary Equipment Involved	Other (Specify)
Additional details for Equipment Involved. Please specify	Emergency Flare > Downstream Activity > MPLX > Intake Gas Flow Restrictions > Sales Valve Communication Failure

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	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	4
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 460669

QUESTIONS (continued)

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QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	04/13/2025
Time vent or flare was discovered or commenced	08:00 PM
Time vent or flare was terminated	11:59 PM
Cumulative hours during this event	4

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: 1,401 Mcf Recovered: 0 Mcf Lost: 1,401 Mcf.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Gas Flare Meter
Is this a gas only submission (i.e. only significant Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.

Venting or Flaring Resulting from Downstream Activity	
Was this vent or flare a result of downstream activity	Yes
Was notification of downstream activity received by this operator	No
Downstream OGRID that should have notified this operator	[14035] MARATHON OIL CO
Date notified of downstream activity requiring this vent or flare	
Time notified of downstream activity requiring this vent or flare	Not answered.

Steps and Actions to Prevent Waste	
For this event, this operator could not have reasonably anticipated the current event and it was beyond this operator's control	True
Please explain reason for why this event was beyond this operator's control	The emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable interruption, restriction, or complete shut-in of a gas pipeline by a third-party pipeline compressor station operator, which impacted Oxy's ability to send gas to them. This interruption, restriction, or complete shut-in of the gas pipeline by a third-party pipeline compression station operator is downstream of Oxy's custody transfer point and out of Oxy's control to foresee, avoid or prevent from happening and did not stem from any of Oxy's upstream facility activity that could have been foreseen and avoided, and could not have been avoided by good design, operation, and preventive maintenance practices. In this case, Enlink, third-party operated downstream pipeline operator, suddenly and unexpectedly had an emergency shutdown, which affected Oxy operations, as they were having compression equipment issues at their Rico station, which in turn prompted high line pressure to occur, which then triggered a flaring event to occur. Oxy is unable to predict or anticipate when Enlink will have issues as this is beyond Oxy's control. Every necessary precaution was taken to ensure that minimization of flaring was done. This event could not have been foreseen, avoided, or prevented from happening as it occurred with no advance notice or warning. Prior to the flaring incident occurring, all OXY operations and facility machinery were operating at peak optimization levels. To mitigate the risks associated with overpressure and to ensure the safety of our operations, Oxy had to resort to controlled flaring. This process allows OXY to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. While flaring is not our preferred method of handling excess gas, it is a necessary step under these exceptional circumstances to maintain the

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	Action Number: 460669
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

ACKNOWLEDGMENTS

☒	I acknowledge that with this application I will be amending an existing incident file (assigned to this operator) for a vent or flare event, pursuant to 19.15.27 and 19.15.28 NMAC.
☒	I acknowledge that amending an incident file does not replace original submitted application(s) or information and understand that any C-129 forms submitted to the OCD will be logged and stored as public record.
☒	I hereby certify the statements in this amending report are true and correct to the best of my knowledge and acknowledge that any false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
☒	I acknowledge that the acceptance of any C-129 forms by the OCD does not relieve this operator of liability should their operations have failed to adequately investigate, report, and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment.
☒	I acknowledge that OCD acceptance of any C-129 forms does not relieve this operator of responsibility for compliance with any other applicable federal, state, or local laws and/or regulations.

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CONDITIONS

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	Action Number: 460669
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

CONDITIONS

Created By	Condition	Condition Date
shelbyschoepf	If the information provided in this report requires further amendment(s), submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.	5/9/2025