



Certificate of Analysis

Number: 6030-25030363-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

Chandler Montgomery
Occidental Petroleum
1502 W Commerce Dr.
Carlsbad, NM 88220

Field: PERMIAN_RESOURCES
Station Name: Gold CTB Check A
Station Number: 17200C
Station Location: OP-L2111-BT002
Sample Point: Meter
Property ID: FMP/LSE NMNM138937
Formation: NEW_MEXICO
County:
Well Name: CTB
Type of Sample: : Spot-Cylinder
Sampling Company: : OXY
Heat Trace Used: N/A
Sampling Method: Purge and Fill
Last Inst. Cal.: 03/17/2025 06:44:38
Analyzed: 03/20/2025 11:44:00 by CDW

Report Date: 03/20/2025
Sampled By: Adrian Guzman
Sample Of: Gas
Sample Type: Spot
Sample Conditions: 86 psig, @ 74 °F
Sample Date: 03/12/2025 12:06
Received Date: 03/18/2025
Login Date: 03/18/2025
Effective Date: 03/01/2025
Flow Rate:
Sampling Method:
Heating Method:
Method: GPA-2261M
Cylinder No: 1111-002616
Instrument: 70142339 (Inficon GC-MicroFusion)

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia		
Hydrogen Sulfide	0.0000	0.0000	0.0000		GPM TOTAL C2+	6.403
Nitrogen	1.8536	1.8560	2.3354		GPM TOTAL C3+	3.202
Methane	74.0560	74.1538	53.4351		GPM TOTAL iC5+	0.588
Carbon Dioxide	1.4470	1.4489	2.8642			
Ethane	11.9744	11.9902	16.1944	3.201		
Propane	6.1248	6.1329	12.1474	1.687		
Iso-butane	0.8553	0.8564	2.2358	0.280		
n-Butane	2.0543	2.0570	5.3703	0.647		
Iso-pentane	0.4551	0.4557	1.4768	0.166		
n-Pentane	0.4764	0.4770	1.5459	0.173		
Hexanes Plus	0.5713	0.5721	2.3947	0.249		
	99.8682	100.0000	100.0000	6.403		

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7714	3.2176
Calculated Molecular Weight	22.26	93.19
Compressibility Factor	0.9961	

GPA 2172 Calculation:

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

Real Gas Dry BTU	1278	5113
Water Sat. Gas Base BTU	1256	5024
Ideal, Gross HV - Dry at 14.65 psia	1273.1	5113.2
Ideal, Gross HV - Wet	1250.8	5023.7
Net BTU Dry Gas - real gas	1161	
Net BTU Wet Gas - real gas	1141	

Comments: H2S Field Content: 0 %

Hydrocarbon Laboratory Manager

Quality Assurance: The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.

**UPSET VENTING EVENT SPECIFIC JUSTIFICATIONS FORM****Facility Id#** fAB1903642598**Operator:** OXY USA, Inc.**Facility:** Gold NC 29 CTB**Vent Date:** 03/16/2025**Duration of Event:** 24 Hours**MCF Vented:** 169.88**Start Time:** 12:00 AM**End Time:** 11:59 PM**Cause:** Iridium Satellite > Flare Scrubber Dump Valve Malfunction > Not Actuating to Complete Close Position > Over Pressure of Water Dump Vent Line > Gold NC 29 CTB > Water Tanks Venting**Method of Flared Gas Measurement:** Calculated Vent Allocation**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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on March 11, 2025, which documented the initial venting event.

Upon reviewing various data sources, it was determined that venting occurred from March 10, 2025, to March 17, 2025. Field crews were dispatched on March 12, 2025, to the Iridium Satellite and the Gold 29 CTB to identify the cause of the vent leak over the water tanks, which took several days to locate and resolve. An unanticipated equipment malfunction occurred at the Iridium Satellite, specifically involving the flare scrubber dump valve. The flare scrubber dump valve failed to close completely, causing gas to be directed down the water dump line to the Gold NC 29 CTB. This action resulted in over-pressurizing Gold NC 29 CTB's water vent line, which triggered venting over the water tanks. Oxy field personnel used process of elimination by reviewing all 29 valves at the Gold NC 29 CTB and the Iridium Satellite. Once the faulty valve was identified, a replacement was immediately done and venting ceased, once pressures stabilized. This event is out of OXY's control yet OXY made every effort to control and minimize emissions as much as possible.

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

This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. 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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting was acknowledged as occurring when it was detected during a flyover on March 11, 2025.

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

Oxy has limited corrective actions to eliminate the cause and potential reoccurrence of equipment malfunctions. Despite various equipment designs and operations, equipment operations are inherently dynamic, and even the smallest alarms can be sudden, reasonably unforeseeable, and unexpected, which may result in malfunctions and venting. Oxy continually aims to operate all its equipment following good practices to minimize emissions and reduce emission events. The Oxy Operations team will review the flare scrubber flow and audit process to ensure the dump valve application is adequate.

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 462102

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 462102
	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 462102

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 462102
	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	[fAB1903642598] NORTH CORRIDOR 29 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	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 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	Iridium Satellite > Flare Scrubber Dump Valve Malfunction > Not Actuating to Complete Close Position > Over Pressure of Water Dump Vent Line > Gold NC 29 CTB > Water Tanks Venting

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	74
Nitrogen (N2) percentage, if greater than one percent	2
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	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sulfide (H2S) PPM quality requirement	0
Carbon Dioxide (CO2) percentage quality requirement	0
Oxygen (O2) percentage quality requirement	0

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QUESTIONS, Page 2

Action 462102

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 462102
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	03/16/2025
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: 170 Mcf Recovered: 0 Mcf Lost: 170 Mcf.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Additional details for Measured or Estimated Volume(s). Please specify	Calculated Vent Allocation
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	No
Downstream OGRID that should have notified this operator	0
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	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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting occurred due to an unidentified vent leak detected during an internal flyover on March 11, 2025, which documented the initial venting event. Upon reviewing various data sources, it was determined that venting occurred from March 10, 2025, to March 17, 2025. Field crews were dispatched on March 12, 2025, to the Iridium Satellite and the Gold 29 CTB to identify the cause of the vent leak over the water tanks, which took several days to locate and resolve. An unanticipated equipment malfunction occurred at the Iridium Satellite, specifically involving the flare scrubber dump valve. The flare scrubber dump valve failed to close completely, causing gas to be directed down the water dump line to the Gold NC 29 CTB. This action resulted in over-pressurizing Gold NC 29 CTB's water vent line, which triggered venting over the water tanks. Oxy field personnel used process of elimination by reviewing all 29 valves at the Gold NC 29 CTB and the Iridium Satellite. Once the faulty valve was identified, a replacement was immediately done and venting ceased, once pressures stabilized. This event is out of OXY's control yet OXY made every effort to control and minimize

	emissions as much as possible.
Steps taken to limit the duration and magnitude of vent or flare	This facility is unmanned, except when Oxy production techs are gathering data or conducting walk-throughs to ensure that there are no problems, circumstances and/or assist other personnel on-site for maintenance purposes. 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 adheres to reputable and effective facility operation practices, including the continuous implementation of a preventative maintenance program for facility equipment. It is Oxy's policy to route all stranded gas to a flare, rather than venting it, during unforeseen and unavoidable emergencies or malfunctions to minimize emissions when possible. However, in this instance, venting was acknowledged as occurring when it was detected during a flyover on March 11, 2025. Upon reviewing various data sources, it was determined that venting occurred from March 10, 2025, to March 17, 2025. Field crews were dispatched on March 12, 2025, to the Iridium Satellite and the Gold 29 CTB to identify the cause of the vent leak over the water tanks, which took several days to locate and resolve. An unanticipated equipment malfunction occurred at the Iridium Satellite, specifically involving the flare scrubber dump valve. The flare scrubber dump valve failed to close completely, causing gas to be directed down the water dump line to the Gold NC 29 CTB. This action resulted in over-pressurizing Gold NC 29 CTB's water vent line, which triggered venting over the water tanks. Oxy field personnel used process of elimination by reviewing all 29 valves at the Gold NC 29 CTB and the Iridium Satellite. Once the faulty valve was identified, a replacement was immediately done and venting ceased, once pressures stabilized. This event is out o
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ACKNOWLEDGMENTS

Action 462102

ACKNOWLEDGMENTS

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	Action Number: 462102
	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

Action 462102

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Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 462102
	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.	5/14/2025