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 FLARING EVENT SPECIFIC JUSTIFICATIONS FORM

Facility: Sand Dunes South Corridor **Flare Date:** 02/19/2025

Duration of Event: 1 Hour 4 Minutes **MCF Flared:** 1453

Start Time: 05:52 AM **End Time:** 06:56 AM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise > South Station

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 preventative maintenance practices. In this case, a flaring event occurred due to an emergency shutdown, which resulted in an unannounced stoppage of sales gas flow intake from OXY by Enterprise operations. This emergency shutdown originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational difficulties at their South Station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the sales gas intake stoppage and/or emergency shutdown happening on their end, until after their emergency shutdown had occurred. This lack of communication significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification 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 from 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 a 98% combustion efficiency to lessen emissions as much as possible. In this case, a flaring event occurred due to an emergency shutdown, which resulted in an unannounced stoppage of sales gas flow intake from OXY by Enterprise operations. This emergency shutdown originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational difficulties at their South Station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the sales gas intake stoppage and/or emergency shutdown happening on their end, until after their emergency shutdown had occurred. This lack of communication significantly hindered Oxy's ability and capacity to prevent

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

Oxy is not in a position to implement corrective measures to address the root cause and prevent future incidents of a gas flow restriction, shut-in or suspension in the Enterprise offload sales gas pipeline, since this matter is beyond Oxy's custody transfer point and outside of Oxy's capacity to correct or keep from happening again. When Enterprise and its operations face challenges managing the volume of gas flow from Oxy, it then limits Oxy's ability to push forward with its sales gas transmission, which in turn, prompts Oxy to flare its excess gas. Oxy is committed to minimizing emissions as much as possible and aims to maintain open communication with its downstream and midstream operators, when feasible, to handle such events effectively.

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: 484589
	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 484589

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 484589
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

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 ID (n#)	*Unavailable.*
Incident Name	*Unavailable.*
Incident Type	**Flare**
Incident Status	*Unavailable.*
Incident Facility	**[fAPP2127048458] Sand Dunes South Corridor CTB**
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.	

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	No
Is this considered a submission for a vent or flare event	**Yes, major 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	Emergency Flare > Third Party Downstream Activity > Enterprise > South Station

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	0
Nitrogen (N2) percentage quality requirement	0
Hydrogen Sufide (H2S) PPM quality requirement	0
Carbon Dioxide (C02) percentage quality requirement	0
Oxygen (02) percentage quality requirement	0

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QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 484589
	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	02/19/2025
Time vent or flare was discovered or commenced	05:52 AM
Time vent or flare was terminated	06:56 AM
Cumulative hours during this event	1

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: 1,453 MCF | Recovered: 0 MCF | Lost: 1,453 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	[713731] Enterprise Crude Pipeline LLC
Date notified of downstream activity requiring this vent or flare	
Time notified of downstream activity requiring this vent or flare	12:00 AM

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 preventative maintenance practices. In this case, a flaring event occurred due to an emergency shutdown, which resulted in an unannounced stoppage of sales gas flow intake from OXY by Enterprise operations. This emergency shutdown originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational difficulties at their South Station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the sales gas intake stoppage and/or emergency shutdown happening on their end, until after their emergency shutdown had occurred. This lack of communication significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification 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 from occurring. This flaring situation was beyond
Steps taken to limit the duration and magnitude of vent or flare	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 a 98% combustion efficiency to lessen emissions as much as possible. In this case, a flaring event occurred due to an emergency shutdown, which resulted in an unannounced stoppage of sales gas flow intake from OXY by Enterprise operations. This emergency shutdown originated from Enterprise, a third-party downstream offloading operator, which was experiencing operational difficulties at their South Station. Although Oxy strived to keep communication channels open with Enterprise personnel, there was no dialogue regarding the sales gas intake stoppage and/or emergency shutdown happening on their end, until after their emergency shutdown had occurred. This lack of communication significantly hindered Oxy's ability and capacity to prevent flaring from occurring. Oxy's field and operations teams diligently oversee the facility to swiftly identify any deviations from standard operational parameters. Nevertheless, Enterprise did not provide any advance warning to the personnel at Oxy regarding a potential stoppage of sales gas flow intake. If Enterprise had provided prior notification 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 from occurring. 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 flaring sit
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ACKNOWLEDGMENTS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 484589
	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

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 484589
	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.	7/14/2025