

# Certificate of Analysis

Number: 6030-24091009-001A

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 Report Date: 10/01/2024
Station Name: Precious CTB Train 2 Check (FMP) Sampled By: JE

Station Number: 17622C Sample Of: Gas Spot Station Location: OP-DELSE-BT001 Sample Date: 09/26/2024 13:20

Sample Point: Meter Sample Conditions: 93 psig, @ 98 °F Ambient: 91 °F Property ID: FMP/LSE NMNM021640 Received Date: 09/27/2024 Formation: NEW\_MEXICO Login Date: 09/27/2024

 Formation:
 NEW\_MEXICO
 Login Date:
 09/27/2024

 County:
 Effective Date:
 09/26/2024 13:20

 Well Name:
 CTB
 Flow Rate:
 29099 MSCFD

 Type of Sample::
 Spot-Cylinder
 Method:
 GPA-2261M

Heat Trace Used: N/A Cylinder No: 1111-006946
Sampling Method: Fill and Purge Instrument: 70142339 (Inficon GC-MicroFusion)

Sampling Company: : OXY Last Inst. Cal.: 09/30/2024 0:00 AM

Analyzed: 10/01/2024 07:26:38 by CDW

## **Analytical Data**

| Components              | Un-normalized Mol % | Mol. %   | Wt. %    | GPM at<br>14.65 psia |  |
|-------------------------|---------------------|----------|----------|----------------------|--|
| Hydrogen Sulfide        | 0.0000              | 0.0000   | 0.0000   |                      |  |
| Nitrogen                | 1.7253              | 1.7041   | 2.0874   |                      |  |
| Carbon Dioxide          | 1.0578              | 1.0448   | 2.0106   |                      |  |
| Methane                 | 73.9778             | 73.0679  | 51.2561  |                      |  |
| Ethane                  | 12.5600             | 12.4055  | 16.3110  | 3.313                |  |
| Propane                 | 6.5193              | 6.4391   | 12.4156  | 1.771                |  |
| Iso-Butane              | 0.9178              | 0.9065   | 2.3039   | 0.296                |  |
| n-Butane                | 2.3489              | 2.3200   | 5.8963   | 0.730                |  |
| Iso-Pentane             | 0.5471              | 0.5404   | 1.7049   | 0.197                |  |
| n-Pentane               | 0.6197              | 0.6121   | 1.9311   | 0.222                |  |
| Hexanes                 | 0.4167              | 0.4116   | 1.5510   | 0.169                |  |
| Heptanes                | 0.3668              | 0.3623   | 1.5874   | 0.167                |  |
| Octanes                 | 0.1597              | 0.1577   | 0.7877   | 0.081                |  |
| Nonanes Plus            | 0.0283              | 0.0280   | 0.1570   | 0.016                |  |
|                         | 101.2452            | 100.0000 | 100.0000 | 6.962                |  |
| Calculated Physical F   |                     | T        | otal     | C9+                  |  |
| Calculated Molecular V  |                     |          | 2.87     | 128.26               |  |
| Compressibility Factor  |                     |          | 958      |                      |  |
| Relative Density Real ( |                     | 0.7      | 927      | 4.4283               |  |
| GPA 2172 Calculation    | = =                 |          |          |                      |  |
| Calculated Gross BTI    | J per ft³ @ 14.65 p |          |          |                      |  |
| Real Gas Dry BTU        |                     |          | 23.6     | 6974.4               |  |
| Water Sat. Gas Base B   |                     |          | 01.0     | 6852.4               |  |
| Ideal, Gross HV - Dry a | at 14.65 psia       |          | 18.0     | 6944.9               |  |
| Ideal, Gross HV - Wet   |                     | 129      | 95.0     | 6820.4               |  |
| Comments: H2S Fiel      | d Content: 0 ppm    |          |          |                      |  |

Mostag Shamana

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 FLARING EVENT SPECIFIC JUSTIFICATIONS FORM**

Facility Id# fAPP2317679662 Operator: OXY USA, Inc.
Facility: Precious NC 31 CTB Flare Date: 08/11/2025

**Duration of Event:** 3 Hours 9 Minutes MCF Flared: 232

Start Time: 08:50 PM End Time: 11:59 PM

Cause: Emergency Flare > Third Party Downstream Activity > Enterprise > Orla Plant > Operational Issues

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, flaring occurred due to an unexpected 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, who was experiencing operational difficulties at their Orla Plant. While Oxy made efforts to maintain open communication with Enterprise personnel, there was no prior discussion regarding the sales gas intake stoppage or the emergency shutdown on Enterprise's side until after their emergency shutdown had taken place. 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 possible interruptions in sales gas flow intake or operational matters that might impact OXY's facilities. 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 chances of a flaring event occurring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. The occurrence of this event was beyond OXY's control. The duration and magnitude of this flaring event were attributable to multiple intermittent flares occurring throughout the period.

## 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, flaring occurred due to an unexpected 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, who was experiencing operational difficulties at their Orla Plant. While Oxy made efforts to maintain open communication with Enterprise personnel, there was no prior discussion regarding the sales gas intake stoppage or the emergency shutdown on Enterprise's side until after their emergency shutdown had taken place. 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 possible interruptions in sales gas flow intake or operational matters that might impact OXY's facilities. 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 chances of a flaring event occurring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. Once flaring was triggered, Oxy production technicians promptly choked back several wells and decreased injection rates in the affected area. These measures were taken to reduce field pressure below the flare activation thresholds of the facility to cease flaring. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the greatest extent.

## 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 encounter operational or equipment issues or have difficulty managing the sales gas transmission flow volume from Oxy inefficiently, Enterprise then restricts Oxy's ability to proceed with its sales gas transmission. 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.

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General Information Phone: (505) 629-6116

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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 499565

### **DEFINITIONS**

| Operator:             | OGRID:                                 |
|-----------------------|--|
| OXY USA INC           | 16696                                  |
| P.O. Box 4294         | Action Number:                         |
| Houston, TX 772104294 | 499565                                 |
|                       | 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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 499565

| Ω  | UESTIONS                             |  |  |
|--|--------------------------------------|--|--|
| Operator:  | 320110110                            | OGRID:   |  |
| OXY USA INC  |                                      | 16696  |  |
| P.O. Box 4294<br>Houston, TX 772104294   |                                      | Action Number: 499565  |  |
|  |                                      | Action Type:<br>[C-129] Venting and/or Flaring (C-129)           |  |
| QUESTIONS  |                                      | ,  |  |
| Prerequisites  |                                      |  |  |
| Any messages presented in this section, will prevent submission of this application. Please resolve t  | these issues before continuing wit   | th the rest of the questions.                                    |  |
| Incident Well  | Unavailable.                         |  |  |
| Incident Facility  | [fAPP2317679662] Precious NC 31 CTB  |  |  |
| Determination of Populing Paguinements   |                                      |  |  |
| Determination of Reporting Requirements  Answer all questions that apply. The Reason(s) statements are calculated based on your answers are  | nd may provide addianal avidance     |  |  |
| 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, 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 v   | enting 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 <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 withing 300 feet from an occupied permanent residence, school, hospital, institution or church in existence   | No                                   |  |  |
|  |                                      |  |  |
| Equipment Involved   | 1                                    |  |  |
| Primary Equipment Involved   | Other (Specify)                      |  |  |
| Additional details for Equipment Involved. Please specify  | Emergency Flare > Third Palssues     | arty Downstream Activity > Enterprise > Orla Plant > Operational |  |
|  |                                      |  |  |
| Representative Compositional Analysis of Vented or Flared Natural Gas  |                                      |  |  |
| Please provide the mole percent for the percentage questions in this group.  Methane (CH4) percentage  | 73                                   |  |  |
| 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 (02) percentage, if greater than one percent  | 0                                    |  |  |
| If you are venting and/or flaring because of Pipeline Specification, please provide the required spec  | ifications 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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS, Page 2

Action 499565

| QUESTI  | ONS (continued)   |
|---|---|
| Operator:   | OGRID:  |
| OXY USA INC<br>P.O. Box 4294  | 16696 Action Number:  |
| Houston, TX 772104294   | 499565  |
|   | Action Type:  [C-129] Venting and/or Flaring (C-129)  |
| QUESTIONS   | [to interpretation of the interpretation of |
| Date(s) and Time(s)   |   |
| Date vent or flare was discovered or commenced  | 08/11/2025  |
| Time vent or flare was discovered or commenced  | 08:50 PM  |
| Time vent or flare was terminated   | 11:59 PM  |
| Cumulative hours during this event  | 3   |
|   |   |
| 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: 232 Mcf   Recovered: 0 Mcf   Lost: 232 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                     | 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           | 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, flaring occurred due to an unexpected 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, who was experiencing operational difficulties at their Orla Plant. While Oxy made   |

efforts to maintain open communication with Enterprise personnel, there was no prior discussion regarding the sales gas intake stoppage or the emergency shutdown on Enterprise's side until after their emergency shutdown had taken place. 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 possible interruptions in sales gas

flow intake or operational matters that might impact OXY's facilities

| Steps taken to limit the duration and magnitude of vent or flare                  | In this case, flaring occurred due to an unexpected 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, who was experiencing operational difficulties at their Orla Plant. While Oxy made efforts to maintain open communication with Enterprise personnel, there was no prior discussion regarding the sales gas intake stoppage or the emergency shutdown on Enterprise's side until after their emergency shutdown had taken place. 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 possible interruptions in sales gas flow intake or operational matters that might impact OXY's facilities. 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 chances of a flaring event occurring. Although flaring is not OXY's preferred method for handling excess gas, it is necessary to ensure the safety of our operations, equipment, and field personnel. Once flaring was triggered, Oxy production technicians promptly choked back several wells and decreased injection rates in the affected area. These measures were taken to reduce field pressure below the flare activation thresholds of the facility to cease flaring. The occurrence of this event was beyond OXY's control. OXY took all possible measures to manage and reduce emissions to the |  |  |
|---|--|--|--|
| Corrective actions taken to eliminate the cause and reoccurrence of vent or flare | 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 encounter operational or equipment issues or have difficulty manging the sales gas transmission flow volume from Oxy inefficiently, Enterprise then restricts Oxy's ability to proceed with its sales gas transmission. 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.   |  |  |

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ACKNOWLEDGMENTS

Action 499565

## **ACKNOWLEDGMENTS**

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| P.O. Box 4294         | Action Number:                         |
| Houston, TX 772104294 | 499565                                 |
|                       | Action Type:                           |
|                       | [C-129] Venting and/or Flaring (C-129) |

## **ACKNOWLEDGMENTS**

| V | 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. |
| V | 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.  |
| V | 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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# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Action 499565

### **CONDITIONS**

| Operator:             | OGRID:                                 |
|-----------------------|--|
| OXY USA INC           | 16696                                  |
| P.O. Box 4294         | Action Number:                         |
| Houston, TX 772104294 | 499565                                 |
|                       | Action Type:                           |
|                       | [C-129] Venting and/or Flaring (C-129) |

### CONDITIONS

| Created By |  | Condition<br>Date |
|------------|--|-------------------|
| marialuna2 | 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. | 8/26/2025         |