



Certificate of Analysis

Number: 6030-24080778-001A

Artesia Laboratory

200 E Main St.

Artesia, NM 88210

Phone 575-746-3481

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

Sep. 07, 2024

Field:	PERMIAN_RESOURCES	Sampled By:	JE
Station Name:	Mesa Verde CTB Check (FMP)	Sample Of:	Gas Spot
Station Number:	15500C	Sample Date:	08/26/2024 13:00
Station Location:	OP-L2109-BT001	Sample Conditions:	88 psig, @ 100 °F Ambient: 94 °F
Sample Point:	Meter	Effective Date:	08/26/2024 13:00
Property ID:	FMP/LSE NMNM137096X	Flow Rate:	16345 MSCFD
Formation:	NEW_MEXICO	Method:	GPA-2261M
County:		Cylinder No:	1111-012788
Well Name:	CTB	Instrument:	70142339 (Inficon GC-MicroFusion)
Type of Sample:	Spot-Cylinder	Last Inst. Cal.:	08/26/2024 0:00 AM
Heat Trace Used:	N/A	Analyzed:	08/29/2024 11:13:00 by CDW
Sampling Method:	Fill and Purge	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	1.5659	1.5454	1.8290	
Carbon Dioxide	3.1602	3.1189	5.7990	
Methane	73.5473	72.5866	49.1967	
Ethane	11.1262	10.9809	13.9497	2.933
Propane	5.8165	5.7405	10.6943	1.580
Iso-Butane	0.8750	0.8636	2.1206	0.282
n-Butane	2.2109	2.1820	5.3580	0.687
Iso-Pentane	0.5872	0.5795	1.7664	0.212
n-Pentane	0.6889	0.6799	2.0724	0.246
Hexanes	0.5852	0.5776	2.1029	0.237
Heptanes	0.7336	0.7240	3.0649	0.334
Octanes	0.4029	0.3976	1.9188	0.203
Nonanes Plus	0.0238	0.0235	0.1273	0.013
	101.3236	100.0000	100.0000	6.727

Calculated Physical Properties

	Total	C9+
Calculated Molecular Weight	23.67	128.26
Compressibility Factor	0.9955	
Relative Density Real Gas	0.8206	4.4283

GPA 2172 Calculation:

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

Real Gas Dry BTU	1317.2	6974.4
Water Sat. Gas Base BTU	1294.7	6852.4
Ideal, Gross HV - Dry at 14.65 psia	1311.3	6943.2
Ideal, Gross HV - Wet	1288.3	6818.7

Comments: H2S Field Content 0 ppm

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: 12/31/2025

Duration of Event: 4 Hours 23 Minutes

MCF Flared: 617

Start Time: 12:00 AM

End Time: 04:23 AM

Cause: Emergency Flare > Third Party Downstream Activity > Enlink > Repeated ESD Valve Closing

Method of Flared Gas Measurement: Gas Flare Meter

1. Reason why this event was beyond Operator's control:

This emissions event was caused by the sudden, unavoidable breakdown of equipment or process that was beyond OXY'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 maintenance practices. This unexpected equipment or process failure was caused by a third-party operator, downstream of OXY's custody transfer point, and was beyond OXY's ability to predict, prevent, or control. This emissions event issue did not arise from any upstream activity at OXY's facility that could have been anticipated or avoided, nor could it have been prevented through proper design, operation, or routine maintenance. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly kept closing throughout the early morning without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure sales line threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to continuing operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve whenever the valve closes. Although Enlink's field technician did arrive, there was a delay in response time, resulting in longer periods of intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring. 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. OXY took all possible measures to manage and reduce emissions to the greatest extent.

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. OXY internal procedures mandate that production technicians promptly assess and respond to unexpected flaring events and ensure the underlying cause is identified. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly kept closing throughout the early morning without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure sales line threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to continuing operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve whenever the valve closes. Although Enlink's field technician did arrive, there was a delay in response time, resulting in longer periods of intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring during each flaring occurrence. 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. 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 unable to initiate or implement corrective actions to prevent or eliminate the causes and potential recurrence of equipment failures or operational issues that are solely attributable to Enlink, a third-party downstream operator. Such equipment breakdowns or process issues occur beyond OXY's custody transfer point and fall outside OXY's scope of control, making them impossible for OXY to anticipate, prevent, or avoid. OXY is dedicated to effectively managing and reducing emissions to the greatest extent possible. The only action that OXY can take in these circumstances is to maintain ongoing communication with Enlink gas control room personnel to ensure coordinated and efficient responses to resolve issues in a timely manner. OXY is dedicated to minimizing emissions wherever feasible and strives to maintain effective communication with both downstream and midstream operators, when practical, to address such issues promptly and efficiently.

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 543765

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 543765
	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 543765

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID:
	16696
	Action Number: 543765
	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#)	<i>Unavailable.</i>
Incident Name	<i>Unavailable.</i>
Incident Type	Flare
Incident Status	<i>Unavailable.</i>
Incident Facility	[fAPP2126659618] MESA VERDE 18 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 additional 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 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 > Third Party Downstream Activity > Enlink > Repeated ESD Valve Closing

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	3
Oxygen (O2) 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	<i>Not answered.</i>
Nitrogen (N2) percentage quality requirement	<i>Not answered.</i>
Hydrogen Sulfide (H2S) PPM quality requirement	<i>Not answered.</i>
Carbon Dioxide (CO2) percentage quality requirement	<i>Not answered.</i>
Oxygen (O2) percentage quality requirement	<i>Not answered.</i>

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QUESTIONS, Page 2

Action 543765

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 543765
	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	12/31/2025
Time vent or flare was discovered or commenced	12:00 AM
Time vent or flare was terminated	04:23 AM
Cumulative hours during this event	5

Measured or Estimated Volume of Vented or Flared Natural Gas	
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	Cause: Other Other (Specify) Natural Gas Flared Released: 617 Mcf Recovered: 0 Mcf Lost: 617 Mcf.
Other Released Details	<i>Not answered.</i>
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	[320009] ENLINK MIDSTREAM OPERATING, LP
Date notified of downstream activity requiring this vent or flare	
Time notified of downstream activity requiring this vent or flare	<i>Not answered.</i>

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 sudden, unavoidable breakdown of equipment or process that was beyond OXY'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 maintenance practices. This unexpected equipment or process failure was caused by a third-party operator, downstream of OXY's custody transfer point, and was beyond OXY's ability to predict, prevent, or control. This emissions event issue did not arise from any upstream activity at OXY's facility that could have been anticipated or avoided, nor could it have been prevented through proper design, operation, or routine maintenance. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly kept closing throughout the early morning without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure sales line threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to continuing operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve whenever the valve closes. Although Enlink's field technician did arrive, there was a delay in response time, resulting in longer periods of intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring. 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. OXY took all possible measures to manage and reduce emissions
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 98% combustion efficiency to lessen emissions as much as possible. OXY internal procedures mandate that production technicians promptly assess and respond to unexpected flaring events and ensure the underlying cause is identified. In this instance, Enlink's emergency shutdown valve (ESD) repeatedly kept closing throughout the early morning without any prior warning or notification from Enlink Gas Control. These abrupt and recurring valve closures caused multiple sudden spikes in sales line pressure, exceeding the high-pressure sales line threshold and triggering intermittent flaring events at Mesa Verde 18 CTB. OXY control room staff quickly contacted Enlink's gas control team to investigate the ESD valve issue and learned that it was due to continuing operational equipment problems on Enlink's side. Enlink indicated that a field technician would be dispatched to reopen the ESD valve whenever the valve closes. Although Enlink's field technician did arrive, there was a delay in response time, resulting in longer periods of intermittent flaring. During this period, OXY field personnel initiated activation of storage wells and shut in high GOR wells as necessary to lower sale line pressure below the flare's trigger set points to cease flaring during each flaring occurrence. 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. OXY took all possible measures to manage and reduce emissions to the greatest extent.
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ACKNOWLEDGMENTS

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	Action Number: 543765
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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: 543765
	Action Type: [C-129] Amend Venting and/or Flaring (C-129A)

CONDITIONS

Created By	Condition	Condition Date
marialuna2	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.	1/15/2026