



Certificate of Analysis

Number: 6030-25030113-001A

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:	03/11/2025
Station Name:	Red Tank 19 Train 2 Check	Sampled By:	Ian Pollock
Station Number:	15622C	Sample Of:	Gas
Station Location:	OP-L2151-BT001	Sample Type:	Spot
Sample Point:	Meter	Sample Conditions:	128 psig, @ 78.1 °F
Property ID:	FMP/LSE N/A	Sample Date:	02/28/2025 11:40
Formation:	NEW_MEXICO	Received Date:	03/07/2025
County:		Login Date:	03/07/2025
Well Name:	CTB	Effective Date:	03/01/2025
Type of Sample :	Spot-Cylinder	Flow Rate:	35692 MSCFD
Sampling Company:	SPL	Sampling Method:	
Heat Trace Used:	N/A	Heating Method:	
Sampling Method:	Purge and Fill	Method:	GPA-2261M
Last Inst. Cal.:	03/10/2025 07:40:57	Cylinder No:	5030-03289
Analyzed:	03/11/2025 07:14:46 by CDW	Instrument:	6030_GC6 (Inficon GC-3000 Micro)

Analytical Data

Components	Un-normalized Mol %	Mol. %	Wt. %	GPM at 14.65 psia	
Hydrogen Sulfide	0.0000	0.0003	0.0005		GPM TOTAL C2+ 6.319
Nitrogen	2.2260	2.2093	2.7879		GPM TOTAL C3+ 3.071
Methane	74.0508	73.4967	53.1133		GPM TOTAL iC5+ 0.443
Carbon Dioxide	1.8717	1.8577	3.6829		
Ethane	12.2596	12.1678	16.4814	3.248	
Propane	6.4182	6.3702	12.6536	1.752	
Iso-butane	0.8106	0.8045	2.1064	0.263	
n-Butane	1.9626	1.9479	5.1000	0.613	
Iso-pentane	0.3830	0.3801	1.2354	0.139	
n-Pentane	0.3985	0.3955	1.2854	0.143	
Hexanes Plus	0.3728	0.3700	1.5532	0.161	
	100.7538	100.0000	100.0000	6.319	

Calculated Physical Properties	Total	C6+
Relative Density Real Gas	0.7691	3.2176
Calculated Molecular Weight	22.20	93.19
Compressibility Factor	0.9962	
GPA 2172 Calculation:		
Calculated Gross BTU per ft³ @ 14.65 psia & 60°F		
Real Gas Dry BTU	1259	5113
Water Sat. Gas Base BTU	1237	5024
Ideal, Gross HV - Dry at 14.65 psia	1253.7	5113.2
Ideal, Gross HV - Wet	1231.8	5023.7
Net BTU Dry Gas - real gas	1143	
Net BTU Wet Gas - real gas	1123	

Comments: H2S Field Content: 2.5 ppm

Mostaq Ahamed

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# fAPP2127031815

Facility: Red Tank 19 CTB

Duration of Event: 2 Hours 49 Minutes

Start Time: 07:13 PM

Cause: Emergency Flare > Downstream Activity > MPLX > Faulty High CO2 Readings

Method of Flared Gas Measurement: Gas Flare Meter

Operator: OXY USA, Inc.

Flare Date: 05/17/2026

MCF Flared: 843

End Time: 10:02 PM

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 OXY's sphere of influence and control and did not stem from any of OXY's operational 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 high standards in facility operations and consistently implements a rigorous preventative maintenance program for its facility equipment. On this occasion, MPLX repeatedly closed its sales valve in response to inaccurate high CO2 readings from its equipment. Each unexpected MPLX sales valve closure caused rapid pressure increases in the sales line as gas intended for sale accumulated, resulting in multiple intermittent flaring events at Red Tank 19 CTB. MPLX had to send a technician to troubleshoot their equipment before reopening their sales valve. OXY field personnel were not notified in advance that MPLX was experiencing faulty high CO2 readings or that their sales valve would be closed repeatedly for troubleshooting. The repeated evening sales valve closures caused by their equipment required MPLX to dispatch a technician several times before the issue was resolved. Before each intermittent flaring event, all OXY operations and facility equipment were functioning at peak optimization levels. To manage overpressure risks and maintain safety, OXY used controlled flaring during unplanned sales line high pressure events not caused by its operations. This process allows OXY to safely burn off the excess gas, thereby preventing potential hazards such as equipment damage, leaks, or even explosions. Flaring was a necessary step under these exceptional circumstances to maintain the integrity and safety of our operations. OXY made every effort to control and minimize emissions as much as possible. If prior notification was made to OXY personnel by MPLX personnel that their sales valve was going to be closed repeatedly to OXY, then OXY 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 additional flaring incidents to occur. The flaring situation was outside of OXY's control; however, the company implemented all feasible measures to effectively minimize emissions.

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. On this occasion, MPLX repeatedly closed its sales valve in response to inaccurate high CO2 readings from its equipment. Each unexpected MPLX sales valve closure caused rapid pressure increases in the sales line as gas intended for sale accumulated, resulting in multiple intermittent flaring events at Red Tank 19 CTB. MPLX had to send a technician to troubleshoot their equipment before reopening their sales valve. OXY field personnel were not notified in advance that MPLX was experiencing faulty high CO2 readings or that their sales valve would be closed repeatedly for troubleshooting. The repeated evening sales valve closures caused by their equipment required MPLX to dispatch a technician several times before the issue was resolved. Before each intermittent flaring event, all OXY operations and facility equipment

were functioning at peak optimization levels. As soon as flaring was triggered during each instance, OXY production techs manually choked back several wells 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 overall flaring situation was caused by operations downstream of OXY's sphere of influence and control; however, OXY implemented all feasible measures to effectively minimize emissions.

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 MPLX, 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 MPLX gas control room and/or field 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 590724

DEFINITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 590724
	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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QUESTIONS

Action 590724

QUESTIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 590724
	Action Type: [C-129] Venting and/or Flaring (C-129)

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 Well	Unavailable.
Incident Facility	[fAPP2127031815] RED TANK 19 CTB

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 > Faulty High CO2 Readings

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	73
Nitrogen (N2) percentage, if greater than one percent	2
Hydrogen Sulfide (H2S) PPM, rounded up	3
Carbon Dioxide (CO2) percentage, if greater than one percent	2
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 590724

QUESTIONS (continued)

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 590724
	Action Type: [C-129] Venting and/or Flaring (C-129)

QUESTIONS

Date(s) and Time(s)	
Date vent or flare was discovered or commenced	05/17/2026
Time vent or flare was discovered or commenced	07:13 PM
Time vent or flare was terminated	10:02 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: Midstream Emergency Maintenance Valve Natural Gas Flared Released: 843 Mcf Recovered: 0 Mcf Lost: 843 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	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	This emissions event was caused by the unforeseen, unexpected, sudden, and unavoidable breakdown of equipment or process that was beyond OXY's sphere of influence and control and did not stem from any of OXY's operational 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 high standards in facility operations and consistently implements a rigorous preventative maintenance program for its facility equipment.
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.
Corrective actions taken to eliminate the cause and reoccurrence of vent or flare	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 MPLX, 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 MPLX gas control room and/or field 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.

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ACKNOWLEDGMENTS

Action 590724

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	Action Number: 590724
	Action Type: [C-129] Venting and/or Flaring (C-129)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit a <i>Venting and/or Flaring</i> (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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<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

Action 590724

CONDITIONS

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 590724
	Action Type: [C-129] Venting and/or Flaring (C-129)

CONDITIONS

Created By	Condition	Condition 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.	6/1/2026