NOTICE

PERMITTING UPDATE FOR C-129 REPORTING

December 7, 2021

In accordance with 19.15.27 and 19.15.28 NMAC, operators are required to submit Form C-129 for Venting and/or Flaring reporting purposes. On May 25, 2021, OCD released the first version of the digital form C-129. Since then, OCD has been collaborating with operators and monitoring the C-129 submissions. It was determined that the C-129 submission could be improved with additional submission pipelines.

On December 7, 2021, the OCD Permitting website will be updated to include a new C-129 Form. The update will introduce three new submission options to select from, they include

- “Notice of Major Venting/Flaring Event”
- “Amend Venting/Flaring”
- “Cancel Venting/Flaring”

The new choices will allow Operators to submit a major notification, amend incorrect C-129’s and cancel incorrectly reported venting/flaring events.

Since there were large changes to the C-129 submission process the OCD is releasing the below guide to assist Operators in the new submission.

Please continue to submit any questions to EMNRD.Wasterule@state.nm.us.
Overview:

The C-129 family of forms now consists of four forms; Venting and/or Flaring (C-129), Notification of Major Venting/Flaring (NOMVF), Amend Venting and/or Flaring (C-129A), and Cancel Venting and/or Flaring (C-129C). Generically speaking, the life cycle of processing the venting and/or flaring events will be accomplished by the reporting operators on the various C-129 family of forms. A simplification of this model could be represented by:

- **C-129**: Complete Data
  - Can be a Major Notification
  - Results in Closed incident
  - Provides incident#

- **NOMVF**: Limited Data
  - Is a Notification
  - Major, 500 MCF +
  - Results in Active incident
  - Provides incident#

- **Incidents**:
  - Releases (C-141s)
  - Venting (C-129s)
  - Flaring (C-129s)

- **C-129A**: Requires an incident#
  - Results in amended closed incident
  - Required to close a NOMVF incident

- **C-129C**: Requires an incident#
  - Results in canceled incident
  - Does not remove incident from OCD Permitting Data

OCD PERMITTING DATA

Venting and/or Flaring discovered or commence
**Venting and/or Flaring (C-129)**

The C-129 is a full report that allows the operators to create an incident to detail the twenty-four-hour interval of a venting and/or flaring event. Operators will use this form when they:

- Must report a Minor or Major Venting and/or Flaring event
- Have all the required information and attachments to complete the form

If the Venting and/or Flaring event is considered Minor which is less than 500 MCF of gas vented or flared, Operators have 15 days from the date of discovery to submit the C-129 form to meet the reporting requirements.

If the Venting and/or Flaring event is considered, Major Operators have 24 hours from the date of discovery to submit the C-129 form to meet the notification and reporting requirements.

Upon submission of the C-129 form, the submitter will receive an email acknowledging the acceptance of the report, along with a unique incident number. Incident numbers are used to view the incident details in OCD Permitting or if needed used to Amend the report by completing a C-129A

See Figure 1 for a step-by-step guide to uploading a Venting and/or Flaring (C-129) application.

**Notification of Major Venting and/or Flaring (NOMVF)**

The NOMVF is a notification that allows operators to create an incident to detail a twenty-four-hour interval of a major venting and/or flaring event. Operators will use this form when they:

- Must report a Major Venting and/or Flaring event which equals or exceeds 500 MCF of gas as defined in 19.15.27 and 19.25.28 NMAC
- DO NOT have all the required information and attachments to complete the C-129 form within 24 hours.

The NOMVF is a modified C-129 Form where only minimal information is requested to create an incident within OCD Permitting and provide the require notice to the OCD via email.

Operators ARE required to complete an additional Amended C-129A within 15 days from the date of discovery to meet the reporting requirements.
Upon submission of the NOMVF the submitter will receive an email acknowledging the acceptance of the report, along with a unique incident number. Incident numbers are used to view the incident details in OCD Permitting and used to amend the notification and complete the report by completing a C-129A.

OCD will automatically receive an email notification of the Major Venting and/or Flaring event meeting the Operators notification requirements from Paragraphs (1) of Subsection G of 19.15.27.7 NMAC and Paragraphs (1) of Subsection F of 19.15.28.8 NMAC.

See Figure 2 for a step-by-step guide to uploading a Notification of Major Venting and/or Flaring application.

**Venting and/or Flaring (C-129)**

The C-129 is a full report that allows the operators to create an incident to detail the twenty-four-hour interval of a venting and/or flaring event. Operators will use this form when they:

- Must report a Minor or Major Venting and/or Flaring event
- Have all the required information and attachments to complete the form

If the Venting and/or Flaring event is considered Minor which is greater than 50 MCF but less than 500 MCF of gas vented or flared as defined in 19.15.27 and 19.15.28 NMAC. Operators have 15 days from the date of discovery to submit the C-129 form to meet the reporting requirements.

If the Venting and/or Flaring event is considered Major Operators have 24 hours from the date of discovery to submit the C-129 form to meet the notification and reporting requirements.

Upon submission of the C-129 form, the submitter will receive an email acknowledging the acceptance of the report, along with a unique incident number. Incident numbers are used to view the incident details in OCD Permitting or if needed used to Amend the report by completing a C-129A

See Figure 1 for a step-by-step guide to uploading a Venting and/or Flaring (C-129) application.

**Amend Venting and/or Flaring (C-129A)**

The C-129A is a full report that allows the operators to edit the details of a Venting and/or Flaring incident. Operators will use this form when they:
- Have completed a NOMVF and now have all the required additional information.
- Need to amend incorrect data from a Venting and/or Flaring incident.
- Upload additional gas loss estimates or gas analysis.

To access the C-129A Operators must submit a valid incident number that is associated with their current OGRID. The C-129A is a modified C-129 Form where previously reported information based upon the incident number is recalled and Operators have the option to amend or complete a C-129 report.

If amending an incident number that was created from a NOMVF, Operators will be required to answer all the remaining questions found on the C-129 form in addition to attaching gas loss calculations and gas analysis.

Operators CANNOT modify the following information:

- Responsible Party (OGRID)
- Association ID (API #, Facility #)
- Location Data (Latitude/Longitude, Unit Letter, Section, Township and Range)

All changes are tracked and stored in the OCD Permitting Database. See Figure 3 for a step-by-step guide to uploading an Amend Venting and/or Flaring (C-129A) application.
Cancel Venting and/or Flaring (C-129C)

The C-129C is a modified report that allows the operators to cancel a Venting and/or Flaring incident. Operators will use this form to cancel an incident for any of the following reasons:

- Association ID incorrect reported
- Location data incorrectly reported
- Reported a duplicate Venting and/or Flaring event
- Inadvertently reported a Venting and/or Flaring event
- Venting and/or Flaring event was reported as a C-141 Release
- Responsible party incorrectly reported

Canceling a Venting and/or Flaring incident for any reason will require the operator to (re)file submission(s) of all/any C-129 forms, and to create a new incident for the cancelled vent or flare event if necessary.

All changes are tracked and stored in the OCD Permitting Database. Canceling an incident does not remove it from the OCD Permitting Database it changes the incident status to canceled. Upon submission of the C-129C form the submitter will receive an email acknowledging the acceptance of the cancelation.

See Figure 4 for a step-by-step guide to uploading a Cancel Venting and/or Flaring (C-129C) application.
After the User has logged into OCD Permitting using valid credentials

1. Click on the Submissions tab in the top right of the website.
2. Select Venting & Flaring and left click on [C-129] Venting and/or Flaring
3. To start a new C-129 Application Click the blue new application button.

3a. Alternatively operators can select a previously started draft from the same screen.
4. Add the Venting and/or flaring Location

5. Enter the Latitude and Longitude of the Venting and/or Flaring Event
   - Note Latitude/Longitude must be NAD83, at least 6 decimal points, and not end in a Zero.

5a The Section, Township and Range will automatically generate based on the Latitude/Longitude inputted by the User. However, the Unit letter defaults to Z and the User must use the drop down box to select the correct Unit Letter. Click the Blue Add Location button to finalize the location data.
6. If the Venting and/or Flaring event is located at a wellsite add the API# use the blue API button. Type in the API# in the box, A drop down list will filter wells associated with the current logged in OGRID number.
7. Alternatively, if the Venting and/or Flaring event is located at a Facility add the Facility ID# by using the blue Facility button.
   - Note (Tank battery’s, Flare stacks, and Natural Gas Gathering System can be registered using the OCD Permitting website.)
8. To attach the required Gas Analysis, and Volume calculation or other attachments click the add attachment button.
   - Note: File must be PDF format. Operators may submit both attachments as one file or separate. If one file is submitted that file must have both attachment type Tags.
The Next sections of the application submission are direct questions regarding the Venting and/or Flaring. Fields with a yellow “required” box must be answered prior to submission. It’s important to note that depending upon answer of the question, other questions may become “required” or the submission may not be accepted.

The following definitions are used for the C-129 from family of submissions.

9. Determination of Report Requirements questions are Yes and No questions that are designed to prevent incorrect submissions of C-129. To answer each question Click the Blue + button next to the question.
When you click the Blue button a pop out will ask you to answer the question.

- Check the Box and press the save button to record a “Yes” answer
- To record a “NO” leave the box uncheck and press save.

After answer the questions the “Determination of Reporting” Box will change status. In this case since the User indicated that the venting or flaring event released more than 50 MCF an error is shown. The reason is because no volume was recorded. This error will correct itself once a volume is added later in the submission process. Additionally, if there is a mistake user can clicking the Clear button to remove that answer.
10. Representative Compositional analysis of Vented or Flared Natural Gas:
   This section is looking for whole integers of the mole percentages from the Natural Gas Analysis. The ONLY exception is for Hydrogen Sulfide (H2S) The answer should be a whole integer rounded to the nearest Parts per Million (PPM)

   *Notes* If less than 1% enter a Zero.
   The second section is only required if Your Venting/Flaring due to not meeting pipeline quality specifications.
### Example

<table>
<thead>
<tr>
<th>Component</th>
<th>Mole %</th>
<th>Mass %</th>
<th>Liquid Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Dioxide, CO2</td>
<td>1.1760</td>
<td>1.7973</td>
<td>1.7973</td>
</tr>
<tr>
<td>Nitrogen, N2</td>
<td>0.8000</td>
<td>0.4952</td>
<td>0.4952</td>
</tr>
<tr>
<td>Methane, C1</td>
<td>52.9310</td>
<td>29.4889</td>
<td>29.4889</td>
</tr>
<tr>
<td>Ethane, C2</td>
<td>20.0380</td>
<td>5.5964</td>
<td>21.7596</td>
</tr>
<tr>
<td>Propane, C3</td>
<td>13.6760</td>
<td>3.7847</td>
<td>20.0411</td>
</tr>
<tr>
<td>Isobutane, iC4</td>
<td>1.7900</td>
<td>0.5884</td>
<td>3.6130</td>
</tr>
<tr>
<td>n-Butane, nC4</td>
<td>4.7030</td>
<td>1.4895</td>
<td>4.9528</td>
</tr>
<tr>
<td>Isopentane, iC5</td>
<td>1.2110</td>
<td>0.4449</td>
<td>3.0342</td>
</tr>
<tr>
<td>n-Pentane, nC5</td>
<td>1.4260</td>
<td>0.5200</td>
<td>3.5779</td>
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<tr>
<td>Hexanes, C6</td>
<td>0.7080</td>
<td>0.3297</td>
<td>2.3682</td>
</tr>
<tr>
<td>Heptanes, C7</td>
<td>0.7060</td>
<td>0.3272</td>
<td>2.4567</td>
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<td>Octanes, C8</td>
<td>0.1680</td>
<td>0.0968</td>
<td>0.7458</td>
</tr>
<tr>
<td>Nonanes, C9</td>
<td>0.0470</td>
<td>0.0266</td>
<td>0.2093</td>
</tr>
<tr>
<td>Decanes Plus, C10+</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
</tr>
<tr>
<td>Water, H2O</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Property</th>
<th>Total Sample</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pressure Base</td>
<td>14.650</td>
</tr>
<tr>
<td>Temperature Base</td>
<td>60.00</td>
</tr>
<tr>
<td>Relative Density</td>
<td>1.0099</td>
</tr>
<tr>
<td>HV, Dry @ Base P, T</td>
<td>1663.25</td>
</tr>
<tr>
<td>HV, Sat @ Base P, T</td>
<td>1634.15</td>
</tr>
<tr>
<td>HV, Sat @ Sample P, T</td>
<td>1656.09</td>
</tr>
<tr>
<td>Furn Factor</td>
<td></td>
</tr>
<tr>
<td>Cricondentherm</td>
<td></td>
</tr>
<tr>
<td>HCDP @ Sample Pressure</td>
<td></td>
</tr>
<tr>
<td>Free Water GPM</td>
<td></td>
</tr>
<tr>
<td>Stock Tank Condensate Btu/mm</td>
<td></td>
</tr>
<tr>
<td>26 # RVP Gasoline</td>
<td>2.630</td>
</tr>
<tr>
<td>Testcar Permian</td>
<td>1.743</td>
</tr>
<tr>
<td>Testcar Panhandle</td>
<td>1.923</td>
</tr>
<tr>
<td>Testcar Midcon</td>
<td>2.206</td>
</tr>
</tbody>
</table>

| Carbon Monoxide, CO                |              |
| Hydrogen, H2                        |              |
| Helium, He                          |              |
| Argon, Ar                           |              |

Totals: 100.0000 13.2392 100.0000

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**Representative Compositional Analysis of Vented or Flared Natural Gas**

Please provide the mole percent for the percentage questions in this group:

- Methane (CH4) percentage: 53
- Nitrogen (N2) percentage, if greater than one percent: 0
- 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

If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.

- Methane (CH4) percentage quality requirement
- Nitrogen (N2) percentage quality requirement
- Hydrogen Sulfide (H2S) PPM quality requirement
- Carbon Dioxide (CO2) percentage quality requirement
- Oxygen (O2) percentage quality requirement
11. Date and Time: This section is requiring the Date and Time that the venting and/or Flaring event occurred. Since the reporting timeframe is in calendar day every venting and/or Flaring event will always terminate on the same day. If the event goes into the next reporting day it starts a new event and the termination time is 11:59 PM.

Operators will calculate the volume and duration from the start of the event to the termination time or 11:59 PM which ever comes first.

*Note if the event is still ongoing after 11:59. That event if applicable must be reported on a separate C-129 with its own unique incident number with a start time of 12:00 AM

Example

As reported above, the venting or flaring event started at 7:34 PM on 10/31/21 and terminated on 11/1/2021 at 3:00 AM. Since the event continued into the next reporting cycling the User entered the termination date of 11:59 PM.

Operators will then calculate the volume/duration between 7:34 PM and 11:59PM and in this case the volume was 380 MCF which meets the requirements to reported on a C-129.

The Operator will then calculate the volume/duration starting at 12:00 AM to 3:00 AM. The calculated volume is only 35 MCF and the duration is 3 hours. Since the volume and duration do not meet the requirements to be reported on a C-129 the operator only needs to track the volume between 12AM-3AM on their C-115B.
12. Measured or Estimated Volume of Vented or Flared Natural Gas. User will use this section to report the volumes of the event. User are to only select and complete the details for applicable events.

Example, If no natural gas was Vented and only Flared, Users will only complete the Natural Gas Flared details.

Users will complete the details by selecting the cause and source of the natural gas that was vented/flared from the drop down list. The released volume will be entered into the released box. It is critical that this section is filled out as failure to do so may prevent the Operator from submitting to the OCD.

*DO NOT* input the volume in the additional details section. All release volumes need to be entered into the released box.
13. Venting or Flaring resulting from Downstream Activity. This section is used to report if the venting or flaring event was from the result of a downstream activity ie. High Line pressure, scheduled/emergency maintenance etc. If the Vent/Flaring event is the result of downstream activity Users are required to provide the following:

- Was proper notification of downstream activity received by your Operator.
  - IF YES, you will need to provide the Date and Time of the notification.
- Downstream OGRID that should have notified you Operator. (The drop down box in the section provide OGRID numbers, by typing their Operator Name.)
14. Steps and Actions to Prevent Waste: This section is where operators can describe actions they have taken to limit the duration and cause of the venting or flaring event.

**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. **Required**
- Please explain reason for why this event was beyond this operator's control
- Steps taken to limit the duration and magnitude of vent or flare **Required**
- Corrective actions taken to eliminate the cause and reoccurrence of vent or flare **Required**

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**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
  - Downstream operator had high line pressure due to emergency shut in
  - Redirected gas to secondary take away
- Steps taken to limit the duration and magnitude of vent or flare
- Corrective actions taken to eliminate the cause and reoccurrence of vent or flare
  - Vent/flare was due to downstream emergency none at this time
15. Acknowledgements: This is the last section that is required to be filled out prior to submission. Please review each one carefully. To accept the acknowledgement left click the check box to the left of each one.

16. If you have completed all sections within the C-129 application the submit to OCD button will change from a light grey to a dark blue. Left Click the button to finish your C-129 report. If the application is no longer needed user can delete the entire submission by selecting the delete button.

Incomplete form review each section for missing information.

Form is read for submission to OCD.
After the User has logged into OCD Permitting using valid credentials

1. Click on the Submissions tab in the top right of the website.
2. Select [NOTIFY] Notification of Major Venting and/or Flaring
3. To start a new Notification of Major Venting and/or Flaring Application Click the blue new application button.

3a. Alternatively operators can select a previously started draft from the same screen.
4. The NOMVF is a shortened version of the questions asked on the C-129 form. The goal is to allow operators to quickly report Major Venting/flaring events with the bare minimum information required. The first step of the NOMVF is to add the Venting and/or flaring location.

5. Enter the Latitude and Longitude of the Venting and/or Flaring Event
   - Note Latitude/Longitude must be NAD83, at least 6 decimal points, and not end in a Zero.

5a The Section, Township and Range will automatically generate based on the Latitude/Longitude inputted by the User. However, the Unit letter defaults to Z and the User must use the drop down box to select the correct Unit Letter. Click the Blue Add Location button to finalize the location data.
6. If the Venting and/or Flaring event is located at a wellsite add the API# use the blue API button. Type in the API# in the box, A drop down list will filter wells associated with the current logged in OGRID number.
7. Alternatively, if the Venting and/or Flaring event is located at a Facility add the Facility ID# by using the blue Facility button.
   - Note (Tank battery’s, Flare stacks, and Natural Gas Gathering System can be registered using the OCD Permitting website.)
8. Determination of Reporting Requirements: These questions are Yes and No questions that are designed to prevent incorrect submissions of Notifications/C-129. To answer each question Click the Blue + button next to the question.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Was this vent or flare caused by an emergency or malfunction</td>
<td>![Required]</td>
</tr>
<tr>
<td>Did this vent or flare last eight hours or more cumulatively within any 24-hour period from a single event</td>
<td>![Required]</td>
</tr>
<tr>
<td>An operator shall file a form C-111 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 NMAG.</td>
<td>![Yes]</td>
</tr>
<tr>
<td>Was there at least 50 MCF of natural gas vented and/or flared during this event</td>
<td>![Required]</td>
</tr>
<tr>
<td>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</td>
<td>![Required]</td>
</tr>
<tr>
<td>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</td>
<td>![Required]</td>
</tr>
</tbody>
</table>
When you click the Blue button a pop out will ask you to answer the question.

- Check the Box and press the save button to record a “Yes” answer
- To record a “NO” leave the box uncheck and press save.

It’s important to note that only Venting or Flaring Events that are considered Major should be reported using the NOMVF. All other Venting and/or Flaring events should be submitted use the C-129 as detailed in Figure 1. Additionally, if there is a mistake user can left click the Clear button to remove that answer.
9. Date and Time(s) This section is used to determine if the Notification has been provided to the OCD within 24 hours of the start time of the Venting/Flaring event. It also sets the date in which Operators are required to submit an Amend Venting and/or Flaring (C-129A) application within 15 days of submitting the NOMVF.

### Example of Timely Submission

<table>
<thead>
<tr>
<th>Date(s) and Time(s)</th>
<th>11/15/2021</th>
<th>Clear</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date vent or flare was discovered or commenced</td>
<td></td>
<td>Clear</td>
</tr>
<tr>
<td>Time vent or flare was discovered or commenced</td>
<td>05:00 PM</td>
<td>Clear</td>
</tr>
<tr>
<td>Is this notification of vent or flare timely</td>
<td>This notification is timely:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• At this time, you may continue to submit this notification.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• In the future, the OCD may require a complete C-129 for untimely notifications.</td>
<td></td>
</tr>
</tbody>
</table>

Per Paragraph (1) of Subsection G. of 19:15:27.8 NMAC, (a) The operator shall notify the division... (ii) for venting or flaring that equals or exceeds 500 MCF... as soon as possible and no later than 24 hours following discovery or commencement of venting or flaring... No later than 15 days following the discovery or commencement of venting or flaring, the operator shall file a form C-129 that verifies, updates, or corrects the verbal or e-mail notification.

### Example of Untimely submission

<table>
<thead>
<tr>
<th>Date(s) and Time(s)</th>
<th>11/15/2021</th>
<th>Clear</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date vent or flare was discovered or commenced</td>
<td></td>
<td>Clear</td>
</tr>
<tr>
<td>Time vent or flare was discovered or commenced</td>
<td>01:00 PM</td>
<td>Clear</td>
</tr>
<tr>
<td>Is this notification of vent or flare timely</td>
<td>This notification is untimely:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• At this time, you may continue to submit this notification.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• In the future, the OCD may require a complete C-129 for untimely notifications.</td>
<td></td>
</tr>
</tbody>
</table>

Per Paragraph (1) of Subsection G. of 19:15:27.8 NMAC, (a) The operator shall notify the division... (ii) for venting or flaring that equals or exceeds 500 MCF... as soon as possible and no later than 24 hours following discovery or commencement of venting or flaring... No later than 15 days following the discovery or commencement of venting or flaring, the operator shall file a form C-129 that verifies, updates, or corrects the verbal or e-mail notification.

Note: Time is based from the OCD Server in Santa Fe.
10. Acknowledgements: This is the last section that is required to be filled out prior to submission. Please review each one carefully. To accept the acknowledgement left click the check box to the left of each one.

If you have completed all sections within the NOMVF application the submit to OCD button will change from a light grey to a dark blue. Left Click the button to finish your Notification of Major Venting/Flaring. If the application is no longer needed user can delete the entire submission by selecting the delete button.

Incomplete form review each section for missing information.

Form is ready for submission to OCD.
11. Once you submit your NOMVF you will receive an email from OCDOnline@state.nm.us indicated that the OCD has accepted the application. Please note down the incident # that was assigned to the application as it will be required to submit an Amend Venting and/or Flaring (C-129A) application.

The Oil Conservation Division (OCD) has accepted the application, Application ID: 21080 (Testing Only)

OCDOnline@state.nm.us
To: Smith, Cory, EHNRD

[Email content]

This is an email from the OCD Permitting development environment and has been sent during testing. Anything contained in this email is NOT an official decision/email of the OCD.

To whom it may concern (c/o Cory Smith for DUGAN PRODUCTION CORP),

The OCD has accepted the submitted Notification of a Major Venting and/or Flaring incident (NOMVF), for incident ID (n#) nAPP2132051684, with the following conditions:

- The information provided in this report REQUIRES at least one amendment to complete the reporting on this event.
- Submit a (C-129) Amend Venting and/or Flaring Incident (C-129A) within 15 days of the discovered/commenced date, utilizing your incident number from this event.

Please reference nAPP2132051684, on all subsequent C-129 submissions and communications regarding any amendments for this report.

If you have any questions regarding this application, or don’t know why you have received this email, please contact us.

ocd.enviro@state.nm.us

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87501

It is important to note that OCD Environmental Bureau Staff will also automatically receive an email like the one above that satisfy the Operators notification requirements from Paragraphs (1) of Subsection G of 19.15.27.7 NMAC and Paragraphs (1) of Subsection F of 19.15.28.8 NMAC.

12. At this time there is no further action required by the Operator until further information has been gathered. It is important to note that you must complete an Amend Venting and/or Flaring (C-129A) application as detailed in Figure 3 within 15 days using the incident number you received in your inbox to meet the reporting requirements.
After the User has logged into OCD Permitting using valid credentials

1. Click on the Submissions tab in the top right of the website.
2. Select [C-129] Amend Venting and/or Flaring
3. To start a new Amend Venting and/or Flaring application Click the blue new application button.

3a. Alternatively operators can select a previously started draft from the same screen.
4. Unlike the other applications the User will start by entering in the associated incident number that they want to amend. User can collect the incident number from the previous accepted email as described in Figure 2 or by searching the OCD Incident Data base on the website. Its important to note that you may only amend incidents associated to your current logged in OGRID.
5. Once you input a valid Incident number that is associated with your current OGRID the system will recall the previous answers from the NOMVF or C-129 and allow you to edit them. An example below from Figure 2 we inputted a Date of Discovery of 11/15/2021 at 5:00 PM.

If for some reason the Date/Time was incorrect Users can change their answers. Edited answer show up as a yellowish tinted background. **note that all changes are tracked in the OCD Permitting system.**

If you made a mistake or want to reset the data to the original answer you can click the Reset button.

6. Users must complete each section of the Amended C-129 report to include:
   - Uploading required gas analysis and volume attachments
   - Representative Compositional Analysis
   - Dates/Times the event occurred
   - Measures or Estimated Volumes of Natural Gas Vented or Flared
   - If the Venting and/or Flaring resulted from Downstream Activity
   - Steps and Actions to Prevent Waste

7. The step-by-step guide on how to fill out the above section’s requirements are detailed in Figure 1 “Submitting a C-129 Form” of this document.
Example of a filled out Amend Venting and/or Flaring application

Method of submission

<table>
<thead>
<tr>
<th>Attachment Type (Description) Tag(s)</th>
<th>Original Uploaded File Name</th>
<th>Delete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compositional Analysis, Volume Calculation</td>
<td>Test PDF.pdf (181.3 Kb)</td>
<td></td>
</tr>
</tbody>
</table>

Add Application Attachments

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/IMAP.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes/No</th>
<th>Clear</th>
<th>Reset</th>
</tr>
</thead>
<tbody>
<tr>
<td>Was there at least 50 MCF of natural gas vented and/or flared during this event</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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</td>
<td>No</td>
<td></td>
<td>Clear</td>
</tr>
<tr>
<td>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</td>
<td>Yes</td>
<td></td>
<td>Clear</td>
</tr>
</tbody>
</table>
**Representative Compositional Analysis of Vented or Flared Natural Gas**

Please provide the mole percent for the percentage questions in this group.

<table>
<thead>
<tr>
<th>Component</th>
<th>Mole Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Methane (CH₄) percentage</td>
<td>53</td>
</tr>
<tr>
<td>Nitrogen (N₂) percentage, if greater than one percent</td>
<td>20</td>
</tr>
<tr>
<td>Hydrogen Sulfide (H₂S) PPM, rounded up</td>
<td>0</td>
</tr>
<tr>
<td>Carbon Dioxide (CO₂) percentage, if greater than one percent</td>
<td>0</td>
</tr>
<tr>
<td>Oxygen (O₂) percentage, if greater than one percent</td>
<td>0</td>
</tr>
</tbody>
</table>

If you are venting and/or flaring because of Pipeline Specification, please provide the required specifications for each gas.

- Methane (CH₄) percentage quality requirement
- Nitrogen (N₂) percentage quality requirement
- Hydrogen Sulfide (H₂S) PPM quality requirement
- Carbon Dioxide (CO₂) percentage quality requirement
- Oxygen (O₂) percentage quality requirement

**Date(s) and Time(s)**

<table>
<thead>
<tr>
<th>Event Description</th>
<th>Date/Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date vent or flare was discovered or commenced</td>
<td>11/14/2021</td>
</tr>
<tr>
<td>Time vent or flare was discovered or commenced</td>
<td>05:00 PM</td>
</tr>
<tr>
<td>Time vent or flare was terminated</td>
<td>07:00 PM</td>
</tr>
<tr>
<td>Cumulative hours during this event</td>
<td>1</td>
</tr>
</tbody>
</table>
### Measured or Estimated Volume of Vented or Flared Natural Gas

- **Natural Gas Vented (McF) Details**
- **Natural Gas Flared (McF) Details**
  - **Cause**: Equipment Failure | Valve | Natural Gas Flared | Released: 675 McF | Recovered: 0 McF | Lost: 675 McF
- **Other Released Details**
- **Additional details** for Measured or Estimated Volume(s). Please specify
- **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**
- **Downstream ORID that should have notified this operator**
- **Date notified of downstream activity requiring this vent or flare**
- **Time notified of downstream activity requiring this vent or flare**

### Stops 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**
  - Equipment Failure
- **Steps taken to limit the duration and magnitude of vent or flare**
  - Changed out inoperable ball valves
- **Corrective actions taken to eliminate the cause and reoccurrence of vent or flare**
  - Updated operations and maintenance plan
After the User has logged into OCD Permitting using valid credentials

1. Click on the Submissions tab in the top right of the website.
2. Select [C-129] Cancel Venting and/or Flaring
3. To start a new Cancel Venting and/or Flaring application Click the blue new application button.

3a. Alternatively operators can select a previously started draft from the same screen.
4. Like the Amend Venting and/or Flaring application, the user will start by entering the associated incident number that they want to cancel. The user can collect the incident number from the previous accepted email as described in Figure 2 or by searching the OCD Incident Database on the website. It’s important to note that you may only cancel incidents associated to your current logged in OGRID.

**Application Details**

**Add Incident ID**

*Incident ID required for submission.*

**Submission Required ID**

- Most of our forms have a single primary ID. If we identify more than one then this message/layout will change.
- The type of ID required is determined by the application. Currently ID is used to determine the placement in imaging.
- If you do not have an ID that is being requested, you could try any of the following:
  - review the available forms, instructions and help pages to determine if an initial form was not filed yet;
  - review the structures for which your operator is responsible;
  - use our public search pages to determine the appropriate ID;
  - contact the department for further instructions.

**Incident ID**

nAPF2132

[APF2132044980] 2021 MINOR I FLAR @ 50-039-21413
[APF2132051684] 2021 MAJOR A FLAR @ 30-639-21413

**Add Incident ID**
5. Once you input a valid Incident number that is associated with your current OGRID the system will recall the incident details.

![Incident Details]

Confirm that you are editing the correct incident number

6. Determination of Cancellation: Choose one of the following reasons why you are canceling the venting and/or flaring incident:

- Association ID’s Incorrectly recorded (Wrong API#/Facility ID)
- Location incorrect (Wrong Lat/Long or Unit Letter, Section, Township Range)
- Duplicate incident (Reported more than once)
- False Incident (doesn’t meet C-129 reporting requirements)
- Venting and/or flaring event reported as release (C-141 was incorrect submitted)
- Release event reported as venting and/or flaring (Incident needs a C-141)
- Responsible Operator incorrectly recorded (3rd Party logged in as wrong OGRID)

![Cancel Reason]

Save
1. Acknowledgements: This is the last section that is required to be filled out prior to submission. Please review each one carefully. To accept the acknowledgement left click the check box to the left of each one.

If you have completed all sections within the Cancelation application the submit to OCD button will change from a light grey to a dark blue. Left Click the button to finish your Cancelation of a Venting and/or Flaring incident. If the application is no longer needed user can delete the entire submission by selecting the delete button.

Incomplete form review each section for missing information.

Form is ready for submission to OCD.