



PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 1 of 11

EQUIPMENT OWNER:

BreitBurn Energy Company LP

300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Newlove Lease, Orcutt Hill Oilfield, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

BreitBurn Energy - Orcutt Hill
Newlove Lease

SSID: 02667
FID: 03321

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

Operate twenty-six (26) Sx Sand Zone wells, three (3) Monterey Zone wells, and one automatic well test system. This equipment was determined by the APCD to require a permit after it was initially claimed as *de minimis* by the operator.

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 2 of 11

CONDITIONS:

9.A Standard Administrative Conditions

Section A lists the applicable standard administrative conditions for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

A.1 Compliance with Permit Conditions:

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [*Re: 40 CFR Part 70.6, APCD Rules 1303.D.1*]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 3 of 11

- A.2 **Emergency Provisions:** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]
- A.3 **Compliance Plan:**
- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
 - (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry:** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.5 **Payment of Fees:** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.6 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 4 of 11

federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]

- A.7 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.8 **Federally-Enforceable Conditions:** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [Re: CAAA, § 502(b)(6), 40 CFR 70.6]
- A.9 **Recordkeeping Requirements:** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions as existing at the time of sampling or measurement.

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by BreitBurn Energy and shall be made available to the APCD upon request. [Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)]

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 5 of 11

- A.10 **Conditions for Permit Reopening:** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) **Additional Requirements:** If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
 - (b) **Inaccurate Permit Provisions:** If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
 - (c) **Applicable Requirement:** If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

- A.11 **Grounds for Revocation:** Failure to abide by and faithfully comply with this permit shall constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.12 **Consistency with Analysis:** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 6 of 11

- A.13 **Equipment Maintenance:** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.
- A.14 **Compliance:** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
- A.15 **Severability:** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- A.16 **Conflict Between Permits:** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- A.17 **Access to Records and Facilities:** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- A.18 **Equipment Identification:** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
- A.19 **Emission Factor Revisions:** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.

9.B Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

Section B lists the applicable 'generic' permit conditions, including emission standards for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable.

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 7 of 11

In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]
- B.2 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]
- B.3 **Organic Solvents (Rule 317):** The permittee shall comply with the emission standards listed in Rule 317.B. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 317*]
- B.4 **Metal Surface Coating Thinner and Reducer (Rule 322):** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 322*]
- B.5 **Architectural Coatings (Rule 323):** The permittee shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rules 323, 317, 322, 324*]
- B.6 **Disposal and Evaporation of Solvents (Rule 324):** The permittee shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8240-R7 and facility inspections. [*Re: APCD Rule 324*]
- B.7 **Emergency Episode Plans (Rule 603):** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [*Reference APCD Rule 603*]

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 8 of 11

B.8 Adhesives and Sealants (Rule 353): The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:

- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately
- (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353. *[Re: APCD Rule 353]*

9.C Requirements and Equipment Specific Conditions

The conditions of PTO 8240-R7 shall remain in full force and effect for the life of this permit. The following conditions and tables supersede the corresponding conditions and tables of PTO 8240-R7:

C.1 Fugitive Hydrocarbon Emissions Components. The following equipment are included in this emissions unit category:

APCD No.	Equipment
101191	Valves, flanges and other components in hydrocarbon service
112816	Oil and Gas Wells
112810	Valves - Gas Service
112811	Flanges/Connections - Gas Service
112812	Valves - Oil Service
112813	Flanges/Connections - Oil Service
112814	Pump Seals - Oil Service

- (a) **Emission Limits:** Fugitive emission limits are not federally-enforceable.
- (b) **Operational Limits:** Operation of the equipment listed in this section shall conform to the requirements listed in APCD Rule 331.D and E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition, the permittee shall meet the following requirements:

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 9 of 11

- (i) *VRS Use*: The vapor recovery/gas collection (VRGC) system shall be in operation when the equipment connected to the VRGC system at the facility is in use. The VRGC system includes piping, valves, and flanges associated with the VRGC system. The VRGC system shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.
- (ii) *I&M Program*: The APCD-approved I&M Plan dated August 30, 2005 (approved by the APCD on September 27, 2005) and any updates shall be implemented for the life of the project. The Plan, and any subsequent APCD approved revisions, is incorporated by reference as an enforceable part of this permit. An updated Fugitive Emissions Inspection and Maintenance Plan must be submitted to the APCD for review and approval within one calendar quarter whenever there is a change in the component list or diagrams.
- (iii) *Venting*: All routine venting of hydrocarbons shall be routed to either a sales compressor, flare header, injection well or other APCD-approved control device.
- (c) Monitoring: The equipment listed in this section are subject to all the monitoring requirements listed in APCD Rule 331.F. The test methods in Rule 331.H shall be used, when applicable.
- (d) Recordkeeping: All inspection and repair records shall be retained at the source for a minimum of five years. The equipment listed in this section are subject to all the recordkeeping requirements listed in APCD Rule 331.G.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six-month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of Pt70 PTO 8240-R7.

9.D APCD-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 10 of 11

and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

Permit condition D.7 supersedes the corresponding conditions and tables of PTO 8240-R7.

- D.7 **Mass Emission Limitations.** Mass emissions for each equipment item (i.e., emissions unit) associated with the Newlove Lease (excluding the Diatomite Project) shall not exceed the values listed in Table 5.1-3 and 5.1-4. Emissions for the entire facility (excluding the Diatomite Project) shall not exceed the total limits listed in Table 5.2.

Permit Activation. All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

AIR POLLUTION CONTROL OFFICER

DATE

Attachments:

- Permitted Emission Tables
- Permit Equipment List

PROPOSED

PERMIT TO OPERATE 13140
AND
PART 70 MINOR PERMIT MODIFICATION 13140

Page 11 of 11

- Permit Evaluation for Permit to Operate 13140

Notes:

- Reevaluation Due Date: June 2, 2012
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.
- This permit supersedes Authority to Construct 13140

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Table 5.1-1 ^(a)
BreitBurn Newlove Lease: Permit to Operate 13140
Operating Equipment Description

Equipment Category	Description	Dev No	Device Specifications			Usage Data		Maximum Operating Schedule					References	
			Feed	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr		year
<u>TVP</u>														
Tanks	Wash Tank	002973	O/W	2.420	3,000 bbls	3,000	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wash Tank	109949	O/W	2.420	3,000 bbls	3,000	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wash Tank	002979	O/W	2.420	3,000 bbls	3,000	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Crude Tank	002974	Oil	2.420	1,000 bbls	3,000	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wastewater Tank	110332	Water	2.420	1,000 bbls	--	--	1.0	1.0	24	2,190	8,760	B	
	Wastewater Tank	107475	Water	2.420	10,000 bbls	--	--	1.0	1.0	24	2,190	8,760	B	
<u>Service</u>														
Pits and Sumps	Well Cellars	003041	O/W	Primary	1,044	ft ²	--	--	1.0	1.0	24	2,190	8,760	B
	Pits (b)	Note (b)	O/W	Secondary	75	ft ²	--	--	1.0	1.0	24	2,190	8,760	B
	Spill Catch Pan	101177	O/W	Primary	5	ft ²	--	--	1.0	1.0	24	2,190	8,760	B
Fugitive Components (c)	Valves, Connections, etc	002980	--	--	62	wells	--	--	1.0	1.0	24	2,190	8,760	C
	Pumps/Compressors/Wellheads	003042	--	--	62	wells	--	--	1.0	1.0	24	2,190	8,760	C
Fugitive Components (d)	Valves		--	Gas	251	clps	--	--	1.0	1.0	24	2,190	8,760	
	Flanges/Connections		--	Gas	1,670	clps	--	--	1.0	1.0	24	2,190	8,760	
	Pressure Safety Valves		--	Gas	0	clps	--	--	1.0	1.0	24	2,190	8,760	
	Valves		--	Oil	245	clps	--	--	1.0	1.0	24	2,190	8,760	
	Flanges/Connections		--	Oil	1,424	clps	--	--	1.0	1.0	24	2,190	8,760	
	Pump Seals		--	Oil	26	clps	--	--	1.0	1.0	24	2,190	8,760	

Notes:

- (a) Does not include Diatomite Project
- (b) Device Number Pits are 101173, 101174, 101175, 101178, 101184, & 101185
- (c) CARB-KVB Method
- (d) Component Leak Path Method

**Table 5.1-2
BreitBurn Newlove Lease: Permit to Operate 13140
Equipment Emission Factors**

Equipment Category	Description	Dev No	Emission Factors						Units
			NO _x	ROC	CO	SO _x	PM	PM ₁₀	
Tanks	Wash Tank	002973	See attached worksheets for emission factors.						
	Wash Tank	109949							
	Wash Tank	002979							
	Crude Tank	002974							
	Wastewater Tank	110332	--	0.0006	--	--	--	--	lb/ft ² -day
	Wastewater Tank	107475	--	0.0006	--	--	--	--	lb/ft ² -day
Pits and Sumps	Well Cellars	003041	--	0.0282	--	--	--	--	lb/ft ² -day
	Pits	Note (b)	--	0.0126	--	--	--	--	lb/ft ² -day
	Spill Catch Pan	101177	--	0.0941	--	--	--	--	lb/ft ² -day
Fugitive Components	Valves, Connections, etc	002980	--	--	--	--	--	--	--
	Pumps/Compressors/Wellheads	003042	--	--	--	--	--	--	--
Fugitive Components (b)	Valves		--	0.0183	--	--	--	--	lbs/clp/day
	Flanges/Connections		--	0.0043	--	--	--	--	lbs/clp/day
	Pressure Safety Valves		--	0.4135	--	--	--	--	lbs/clp/day
	Valves		--	0.0005	--	--	--	--	lbs/clp/day
	Flanges/Connections		--	0.0002	--	--	--	--	lbs/clp/day
	Pump Seals		--	0.0004	--	--	--	--	lbs/clp/day

**Table 5.1-3
BreitBurn Newlove Lease: Permit to Operate 13140
Hourly and Daily Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	109949	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	002979	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 13134
	Crude Tank	002974	--	--	0.05	1.12	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wastewater Tank	110332	--	--	0.01	0.23	--	--	--	--	--	--	--	--	FE	ATC 12354
	Wastewater Tank	107475	--	--	0.06	1.50	--	--	--	--	--	--	--	--	FE	ATC 11909
Pits and Sumps	Well Cellars	003041	--	--	1.23	29.47	--	--	--	--	--	--	--	--	A	--
	Pits	Note (b)	--	--	0.04	0.94	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.50	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves, Connections, etc	002980	--	--	2.17	52.19	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.04	1.01	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves		--	--	0.19	4.59	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.30	7.25	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.00	0.11	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.01	0.32	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13140

Notes:

A = APCD enforceable emission limit.
FE = Federally enforceable emission limit.

**Table 5.1-4
BreitBurn Newlove Lease: Permit to Operate 13140
Quarterly and Annual Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	109949	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	002979	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Crude Tank	002974	--	--	0.05	0.20	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wastewater Tank	110332	--	--	0.01	0.04	--	--	--	--	--	--	--	--	FE	ATC 12354
	Wastewater Tank	107475	--	--	0.07	0.27	--	--	--	--	--	--	--	--	FE	ATC 11909
Pits and Sumps	Well Cellars	003041	--	--	1.34	5.38	--	--	--	--	--	--	--	--	A	--
	Pits	Note (b)	--	--	0.04	0.17	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.09	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves, Connections, etc	002980	--	--	2.38	9.52	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.05	0.18	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves		--	--	0.21	0.84	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.33	1.32	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.01	0.02	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.01	0.06	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE	ATC 13140

Notes:

A = APCD enforceable emission limit.
FE = Federally enforceable emission limit.

Table 5.2
BreitBurn Newlove Lease: Permit to Operate 13140
Total Permitted Facility Emissions

A. HOURLY (lb/hr)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.12	--	--	--	--
Pits and Sumps	--	1.29	--	--	--	--
Fugitive Components	--	2.73	--	--	--	--
	0.00	4.14	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	2.97	--	--	--	--
Pits and Sumps	--	30.91	--	--	--	--
Fugitive Components	--	65.48	--	--	--	--
	0.00	99.37	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.14	--	--	--	--
Pits and Sumps	--	1.41	--	--	--	--
Fugitive Components	--	2.99	--	--	--	--
	0.00	4.53	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.54	--	--	--	--
Pits and Sumps	--	5.64	--	--	--	--
Fugitive Components	--	11.95	--	--	--	--
	0.00	18.13	0.00	0.00	0.00	0.00

**Table 5.3
BreitBurn Newlove Lease: Permit to Operate 13140
Federal Potential To Emit**

A. HOURLY (lb/hr)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.12	--	--	--	--
Pits and Sumps	--	1.29	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.51	--	--	--	--
	0.00	1.93	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	2.97	--	--	--	--
Pits and Sumps	--	30.91	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	12.28	--	--	--	--
	0.00	46.18	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.14	--	--	--	--
Pits and Sumps	--	1.41	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.56	--	--	--	--
	0.00	2.12	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO_x	ROC	CO	SO_x	PM	PM₁₀
Tanks	--	0.54	--	--	--	--
Pits and Sumps	--	5.64	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	2.24	--	--	--	--
	0.00	8.44	0.00	0.00	0.00	0.00

PROPOSED

Equipment List for Permit to Operate 13140

PERMIT EQUIPMENT LIST - TABLE A

PTO 13140 / FID: 03321 Newlove Lease / SSID: 02667

A PERMITTED EQUIPMENT

1 Oil & Gas Wells

<i>Device ID #</i>	112816	<i>Device Name</i>	Oil & Gas Wells
<i>Rated Heat Input</i>		<i>Physical Size</i>	29.00 Installation
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	29 wells not equipped with well cellars		

2 Automatic Well Tester

<i>Device ID #</i>	112817	<i>Device Name</i>	Automatic Well Tester
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Two feet in diameter by 5 feet long, horizontal, connected to the gas gathering system. Includes two header systems referred to as Pipe Rack B-2 and Pipe Rack B-3.		

PROPOSED

Equipment List for Permit to Operate 13140

Page 2 of 3

3 Fugitive Hydrogen Components

3.1 Valves - Gas Service

<i>Device ID #</i>	112810	<i>Device Name</i>	Valves - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	251 clps		
<i>Description</i>			

3.2 Flanges/Connections - Gas Service

<i>Device ID #</i>	112811	<i>Device Name</i>	Flanges/Connections - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	1,670 clps		
<i>Description</i>			

3.3 Valves - Oil Service

<i>Device ID #</i>	112812	<i>Device Name</i>	Valves - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	245 clps		
<i>Description</i>			

PROPOSED

Equipment List for Permit to Operate 13140

Page 3 of 3

3.4 Flanges/Connections - Oil Service

<i>Device ID #</i>	112813	<i>Device Name</i>	Flanges/Connections - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	1,424 clps		
<i>Description</i>			

3.5 Pump Seals - Oil Service

<i>Device ID #</i>	112814	<i>Device Name</i>	Pump Seals - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	26 clps		
<i>Description</i>			



PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13140

Page 1 of 4

1.0 BACKGROUND

- 1.1 General: Authority to Construct 13140 was issued 12/2/2009 for the installation of 29 oil and gas wells. The operator initially claimed the equipment in the permit to be *de minimis* per APCD Rule 202.D.6. However, the drilling of the wells into the Sx Sand Zone were performed as a single project, therefore, the *de minimis* exemption is not applicable since the emissions are evaluated on a project basis and not on a well by well basis. The permit also includes three wells drilled into the Monterey Zone and an automatic well testing system. The Source Compliance Demonstration Period (SCDP) inspection was conducted on January 5, 2010. The inspection report indicates that the conditions of the SCDP were satisfied.
- 1.2 Permit History: See Pt70 PTO 8240-R7 for a complete permit history of this facility.
- 1.3 Compliance History: See Pt70 PTO 8240-R7 for a complete compliance history of this facility.

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: The equipment subject to this permit includes twenty-nine well heads, an automatic well testing system and associated valves, flanges, pump seals, and fittings which emit fugitive hydrocarbon emissions. Production flow lines and casinghead gas lines are tied into a well header system.
- 2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with APCD Rule 331. An 80-percent reduction is applied to valves, flanges, pump seals, and fittings, for implementation of Rule 331.
- 2.3 Emission Factors: Emission factors are documented in the attached emission calculation worksheet.
- 2.4 Reasonable Worst Case Emission Scenario: The operating scenario is summarized as follows:
 - Permitted equipment operates 24 hrs/day, 365 days/yr.

PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13140

Page 2 of 4

- An 80% ROC emission reduction is applied to valves, connections, and fittings for implementation of Rule 331.

- 2.5 Emission Calculations: A detailed emission calculation spreadsheet may be found in Attachment A. These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions to ensure compliance with APCD rules and regulations.
- 2.9 Monitoring Requirements: The only monitoring requirements of this permit are the monitoring of fugitive hydrocarbon emissions and solvent use.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 309. Specific Contaminants
- Rule 324. Disposal and Evaporation of Solvents
- Rule 331. Fugitive Emissions Inspection and Maintenance
- Rule 353. Adhesives and Sealants
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: N/A

PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13140

Page 3 of 4

4.3 **NEI Calculations**: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). Since this is new equipment, the associated emissions contribute to the NEI for this stationary source.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 **Offsets**: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 **ERCs**: This source does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA and Equipment or Operations Exempt from CEQA*) provides an exemption specifically for permits to operate. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS

This project was not subject to public notice.

11.0 FEE DETERMINATION

Fees for the APCD's work effects are assessed on a fee basis. The Project Code is *300000 (Onshore Oil and Gas Lease)*. See the *Fee Statement* Attachment for the fee calculations.

ATTACHMENT A

Emission Calculations

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION									
Attachment: A									
Company: BreitBurn									
Facility: Newlove Lease									
Processed by: JJM									
Date: 5/23/2010									
Path & File Name:									
Facility Type: (Choose one)									
Production Field	x								
Gas Processing Plant									
Refinery									
Offshore Platform									
Component	Count ⁽¹⁾	ROC ⁽²⁾ Emission Factor (lbs/day-clp)	ROC/THC Ratio	Uncontrolled ROC Emission (lbs/day)	ROC Control Eff	Controlled ROC Emission (lbs/hr)	Controlled ROC Emission (lbs/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/year)
Gas Condensate Service									
Valves - Acc/Inacc	251	0.295	0.31	22.95	0.80	0.19	4.59	0.21	0.84
Valves - Bellows		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Low Emitting		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - E-500		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - E-100		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Flanges - Acc/Inacc	1,670	0.070	0.31	36.24	0.80	0.30	7.25	0.33	1.32
Flanges - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges - E-500		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges - E-100		0.070	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Compressor Seals - E-500		2.143	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Compressor Seals - E-100		2.143	0.31	0.00	0.90	0.00	0.00	0.00	0.00
PSV - To Atm		6.670	0.31	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		6.670	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - E-500		6.670	0.31	0.00	0.85	0.00	0.00	0.00	0.00
PSV - E-100		6.670	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Pump Seals	0	1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - E-500		1.123	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Pump Seals - E-100		1.123	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Sub Total	1,921			59.19		0.49	11.84	0.54	2.16
Oil Service									
Valves - Acc/Inacc	245	0.0041	0.56	0.56	0.80	0.00	0.11	0.01	0.02
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - E-500		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - E-100		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Flanges - Acc/Inacc	1,424	0.0020	0.56	1.59	0.80	0.01	0.32	0.01	0.06
Flanges - Unsafe		0.0020	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges - E-500		0.0020	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges - E-100		0.0020	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Pump Seals - Single	26	0.0039	0.56	0.06	0.80	0.00	0.01	0.00	0.00
Pump Seals - E-500		0.0039	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Pump Seals - E-100		0.0039	0.56	0.00	0.90	0.00	0.00	0.00	0.00
PSV - To Atm		0.2670	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.2670	0.56	0.00	1.00	0.00	0.00	0.00	0.00
PSV - E-500		0.2670	0.56	0.00	0.85	0.00	0.00	0.00	0.00
PSV - E-100		0.2670	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Sub Total	1,695			2.214		0.02	0.44	0.02	0.08
Total	3,616			61.41		0.51	12.28	0.56	2.24
Notes:									
1. Source:									
2. APCD P&P # 6100.060.1998.									
3. APCD P&P # 6100.061.1998									
4. A 80% efficiency is assigned to fugitive components Rule 331 implementation.									

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17

Leak Path Type	Well 111	Well 112	Well 113	Well 300H	Well 301	Well 302	Well 303	Well 304	Well 305H	Well 306H	Well 307	Well 308H	Well 309H	Well 310H	Well 311H	Well 312H	Well 313H
Gas Service																	
Bonnet	2	2	2	2	0	1	2	2	2	1	2	2	2	2	1	2	2
Compressor Seal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pump Seal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Valve Stem	8	6	6	10	10	11	11	10	13	6	9	8	6	7	5	7	10
Threaded Connections	38	22	31	72	63	69	73	76	73	39	58	46	32	52	32	41	54
Flange	1	1	1	1	1	2	1	1	1	1	1	0	1	1	1	1	1
Other	10	5	8	14	0	0	2	4	14	6	11	2	5	2	4	3	10
Subtotal	59	36	48	99	74	83	89	93	103	53	81	58	46	64	43	54	77
Oil Service																	
Bonnet	2	2	2	2	0	0	2	2	2	2	3	1	2	2	3	2	2
Compressor Seal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pump Seal	1	1	1	1	0	0	1	1	0	1	1	1	1	1	1	1	1
Valve Stem	6	6	6	5	9	9	6	8	6	6	5	5	6	6	5	6	6
Threaded Connection	32	27	26	21	57	63	44	63	33	42	25	35	34	34	28	31	28
Flange	0	0	0	1	4	0	0	0	0	0	0	1	0	0	0	0	1
Other	5	5	5	4	1	1	0	2	5	6	3	3	5	2	5	3	5
Subtotal	46	41	40	34	71	73	53	76	46	57	37	46	48	45	42	43	43
Grand Total	105	77	88	133	145	156	142	169	149	110	118	104	94	109	85	97	120

Component Leak Path counts provided by Avanti and dated 1/1/2009.
Wells 353i and 354i have been converted to water injection wells.

ATTACHMENT B

Figures and Tables

Facility Emissions Summary
Newlove Lease FID 3321

I. This Projects "T" NEI-90

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										

II. This Facility's "P1s"

Enter all facility "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
P11909	05/23/06			1.50	0.27								
A12084 ₁	06/05/07	16.50	3.01	25.35	3.21	28.50	5.20	5.55	1.01	9.00	1.64	9.00	1.64
A12084 ₂	06/05/07	33.00	6.02	26.71	4.23	57.00	10.40	11.11	2.03	18.00	3.29	18.00	3.29
P12144	08/31/07			0.00	0.00								
P12354	01/10/08			0.23	0.04								
A12273	07/18/07			0.04	0.01								
A13000	07/17/09	17.57	1.67	2.02	0.24	44.57	4.24	3.89	0.37	24.05	2.29	24.05	2.29
A13134	05/27/09			0.95	0.17								
A13140	12/02/09			12.28	2.24								
P13141	08/26/09			0.20	0.04								
A13230	TBD			7.28	1.33								
Totals		67.07	10.70	76.56	11.78	130.07	19.84	20.55	3.41	51.05	7.22	51.05	7.22

Notes:
 (1) Facility NEI from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
 (4) ATC 12084 shows Phase 1 and Phase 2 NEI separately

III. This Facility's "P2" NEI-90 Decreases

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
A12084-01													
P12084													
A13000		13.15	0.87	1.15	0.08	33.36	2.19	2.92	0.19	18.00	1.18	18.00	1.18
Totals		13.15	0.87	1.15	0.08	33.36	2.19	2.92	0.19	18.00	1.18	18.00	1.18

Notes:
 (1) Facility NEI from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

IV. This Facility's Pre-90 "D" Decreases

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P11909	05/23/06			1.50	0.27								
P12354	01/10/08			0.23	0.04								
P12273	07/17/09			0.04	0.01								
Totals		0.00	0.00	1.77	0.32	0.00							

Notes:
 (1) Facility "D" from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

V. Calculated This Facility's NEI-90

Table below summarizes facility NEI-90 as equal to I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "T"	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	67.07	10.70	76.56	11.78	130.07	19.84	20.55	3.41	51.05	7.22	51.05	7.22
P2	13.15	0.87	1.15	0.08	33.36	2.19	2.92	0.19	18.00	1.18	18.00	1.18
D	0.00	0.00	1.77	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FNEI-90	53.92	9.83	73.64	11.38	96.71	17.65	17.63	3.22	33.05	6.04	33.05	6.04

Notes:
 (1) Resultant FNEI-90 from above Section I thru IV data.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Calculated This Facility's NEI-90 (adjusted) ¹

Table below summarizes facility NEI-90 adjusted to only show ATC 12084 Phase 1 NEI contribution

FNEI-90 (adjusted)	20.92	3.81	46.93	7.15	39.71	7.25	6.52	1.19	15.05	2.75	15.05	2.75
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Notes:
 (1) Table shown is without Phase 2 ATC 12084 NEI contribution

Stationary Source NEI-90 Calculations
BreitBurn Energy Company LP Orcutt Hill Stationary Source

Facility FNEI-90 at this SSN

Enter all other facility NEI-90s below:

Facility No.	Date Revised	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
3206		0.00	0.00	1.78	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3313		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3314		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3316		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3318		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3319		0.00	0.00	1.25	0.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3320		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3321		53.92	9.83	73.64	11.38	96.71	17.65	17.63	3.22	33.05	6.04	33.05	6.04
3322		0.00	0.00	0.75	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3323		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3324		0.00	0.00	0.85	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3495		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4104		0.00	0.00	1.17	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4214		11.04	0.23	0.60	0.01	9.27	0.19	0.58	0.01	0.06	0.01	0.06	0.01
10482		6.05	1.09	4.26	0.77	10.49	1.91	2.04	0.37	3.31	0.60	3.31	0.60
1904		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		71.01	11.15	84.30	13.23	116.47	19.75	20.25	3.60	36.42	6.65	36.42	6.65

Notes:
 (1) Facility NEI from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Calculate This SSN's NEI-90

Table below summarizes Stationary Source NEI-90 as equal to sum of each facility's (unless footnoted by an enforceable NEI scenario)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
SSN NEI-90	71.01	11.15	84.30	13.23	116.47	19.75	20.25	3.60	36.42	6.65	36.42	6.65

Notes:
 (1) Resultant SSN NEI-90 from above Section I thru IV data.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
 (4) Includes Phase 1 and 2 NEI under ATC 12084.

Table below summarizes Stationary Source NEI-90 (**adjusted**)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
SSN NEI-90	38.01	5.13	57.59	9.00	59.47	9.35	9.14	1.57	18.42	3.36	18.42	3.36

Notes:
 (1) This Stationary Source NEI (adjusted) is applicable to all stationary source offset determinations until such time Phase 2 construction begins under ATC 12084. See NEI discussion in Engineering Evaluation in PTO 12273 for more details.

ATTACHMENT C

Well List

Well Count	Operator	Field Name	Lease	Well#	API	Well Stat	Well Type	S	T	R	Pool Name	NEI
1	Breitburn	Orcutt	Newlove	111	08322525	Active	OG	31	9N	33W	Monterey	Yes
2	Breitburn	Orcutt	Newlove	112	08322524	Active	OG	30	9N	33W	Monterey	Yes
3	Breitburn	Orcutt	Newlove	113	08322526	Active	OG	30	9N	33W	Monterey	Yes
4	Breitburn	Orcutt	Newlove	300H	08322448	Active	OG	25	9N	34W	SX	Yes
5	Breitburn	Orcutt	Newlove	301	08322434	Active	OG	25	9N	34W	SX	Yes
6	Breitburn	Orcutt	Newlove	302	08322425	Active	OG	30	9N	33W	SX	Yes
7	Breitburn	Orcutt	Newlove	303	08322447	Active	OG	25	9N	34W	SX	Yes
8	Breitburn	Orcutt	Newlove	304	08322449	Active	OG	30	9N	33W	SX	Yes
9	Breitburn	Orcutt	Newlove	305H	08322502	Active	OG	36	9N	34W	SX	Yes
10	Breitburn	Orcutt	Newlove	306H	08322503	Active	OG	25	9N	34W	SX	Yes
11	Breitburn	Orcutt	Newlove	307H	08322506	Active	OG	31	9N	34W	SX	Yes
12	Breitburn	Orcutt	Newlove	308 H	08322510	Active	OG	25	9N	34W	SX	Yes
13	Breitburn	Orcutt	Newlove	309H	08322518	Active	OG	25	9N	34W	SX	Yes
14	Breitburn	Orcutt	Newlove	310H	08322514	Active	OG	25	9N	34W	SX	Yes
15	Breitburn	Orcutt	Newlove	311H	08322519	Active	OG	25	9N	34W	SX	Yes
16	Breitburn	Orcutt	Newlove	312H	08322515	Active	OG	25	9N	34W	SX	Yes
17	Breitburn	Orcutt	Newlove	313H	08322529	Active	OG	30	9N	33W	SX	Yes
18	Breitburn	Orcutt	Newlove	314H	08322531	Active	OG	30	9N	33W	SX	Yes
19	Breitburn	Orcutt	Newlove	315H	08322533	Active	OG	36	9N	34W	SX	Yes
20	Breitburn	Orcutt	Newlove	316H	8322542	Active	OG	36	9N	34W	SX	Yes
21	Breitburn	Orcutt	Newlove	317H	08322543	Active	OG	36	9N	34W	SX	Yes
22	Breitburn	Orcutt	Newlove	318H	08322544	Active	OG	25	8N	34W	SX	Yes
23	Breitburn	Orcutt	Newlove	321H	08322546	Active	OG	25	9N	34W	SX	Yes
24	Breitburn	Orcutt	Newlove	322H	08322547	Active	OG	25	9N	34W	SX	Yes
25	Breitburn	Orcutt	Newlove	325H	08322545	Active	OG	30	9N	33W	SX	Yes
26	Breitburn	Orcutt	Newlove	326H	08322548	Active	OG	30	9N	33W	SX	Yes
27	Breitburn	Orcutt	Newlove	355 I	08322520	Active	OG	25	9N	34W	SX	Yes
28	Breitburn	Orcutt	Newlove	356 I	08322516	Active	OG	25	9N	34W	SX	Yes
29	Breitburn	Orcutt	Newlove	357I	08322530	Active	OG	30	9N	33W	SX	Yes

ATTACHMENT D

Fee Statement

FEE STATEMENT

PTO No. 13140

FID: 03321 Newlove Lease / SSID: 02667



Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112816	Oil & Gas Wells	A1.a	1.000	58.66	Per equipment	No	29	1.000	1,701.14	0.00	0.00	1,701.14
112817	Automatic Well Tester	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
112810	Valves - Gas Service	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
Device Fee Sub-Totals =									\$1,818.46	\$0.00	\$0.00	
Device Fee Total =												\$1,818.46

Fee Statement Grand Total = \$1,818

Notes:

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- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
 - (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.