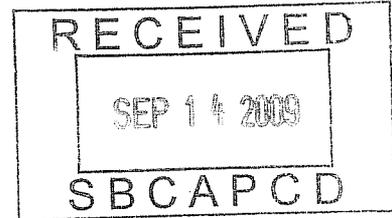




VENOCO, INC.



September 9, 2009

Mr. Ben Ellenberger
Santa Barbara County APCD
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

Re: Permit to Operate (PTO) Modification Application for Ellwood Onshore Facility,
Part 70 Operating Permit and PTO No. 7904-R8 to Increase Inlet Gas CO₂
Content to 20%

Project No. TBD

Dear Mr. Ellenberger:

This PTO Modification Application is being submitted to reflect an increase in the CO₂ content of the inlet gas to EOF from 17% to 20%, and decrease volumetric flaring correspondingly from 16.41 MMSCF/month to 15.82 MMSCF/month to ensure compliance with Rule 359. In addition, the flaring heat input limit will be reduced from 221,749 MMBtu/Yr (at 17% CO₂ inlet gas) to 213,734 MMBtu/Yr (at 20% CO₂ inlet gas).

Enclosed in this application package is Form APCD-01, Part 70 Form 1302-A1, Part 70 Form 1302-A2, Part 70 Form 1302-B, and Part 70 Form 1302-M. In addition the Flare Minimization Plan and the Flare Monitoring Plan have been revised to reflect this modification as well.

Please bill Venoco for the Rule 210 application fee.

If you have any questions concerning this application, please call me at (805) 745-2270.

Sincerely,

Laura Kranzler
Northern Assets Environmental Coordinator

Attachments: Permit Application Forms APCD-01
Permit Application Forms 1302-A1, A2, B, and M
EOF Rule 359 Maximum Flaring Worksheet
Revised Flare Minimization Plan
Revised Flare Monitoring Plan

Copy to: Ed O'Donnell, Venoco Inc. (w/o enclosures)
Jeff MacDonald, Venoco Inc.
Keith Wenal, Venoco Inc.
Bob Van Nostrand, Venoco Inc.
Walt McCarty, Venoco Inc.



General Permit Application Form -01

Santa Barbara County Air Pollution Control District
PO Box 6447, Santa Barbara, CA 93160-6447

1. APPLICATION TYPE (check all that apply):

- Authority to Construct (ATC)
- Permit to Operate (PTO)
- ATC Modification
- PTO Modification
- Other (Specify)
- Transfer of Owner/Operator (use Form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known)

Yes No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. [http://www.sbcapcd.org/eng/dl/appforms/t5-forms\(ver1.2\).pdf](http://www.sbcapcd.org/eng/dl/appforms/t5-forms(ver1.2).pdf)

Mail the completed application to the APCD's Engineering & Compliance Division (ECD) at the address listed above.

2. FILING FEE:

A \$335 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.sbcapcd.org/fees.htm>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf> Yes No

If yes, provide the name of school(s)

Address of school(s)

City Zip Code

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? Yes No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): http://www.sbcapcd.org/eng/dl/eng_p-and-p/6100-020.pdf, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY			DATE STAMP
FID	00028	Permit No. A/P 13292	<div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>RECEIVED</p> <p>SEP 14 2009</p> <p>SBCAPCD</p> </div>
Project Name	Ellwood Onshore Facility		
Filing Fee	335.00 Billed	202.E? YES / NO	

*See Page 4 of 6
"Please deduct filing fee from my existing reimbursement"*

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Venoco, Inc.		
Doing Business As	Oil and Gas Production		
Contact Name	Laura Kranzler	Position/Title	Northern Assets Environmental Coordinator
Mailing Address	6267 Carpinteria Ave., Suite 100		
City	Carpinteria	State	CA Zip Code 93013
Telephone	805-745-2270	Fax	805-745-1176 Email lkranzler@venocoinc.com

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Same as above		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Telephone		Fax	
		Email	

Authorized Agent Info*		<input type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Telephone		Fax	
		Email	

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (<http://www.sbcpd.org/eng/dl/appforms/apcd-01a.pdf>). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO (check all that apply):			
<input checked="" type="checkbox"/> Owner	<input type="checkbox"/> Operator		
<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)		

6. GENERAL NATURE OF BUSINESS OR AGENCY:

Oil and Gas Production

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	7979 Hollister Ave.		
City	Goleta	State	CA Zip Code 93117
Work Site Phone	+1 (805) 961-2301		

- Incorporated (within city limits) Unincorporated (outside city limits) Used at Various Locations

Assessors Parcel No(s):

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

Increase inlet gas CO2 limit at Ellwood Onshore Facility (EOF) from 17% to 20%, and decrease volumetric flaring correspondingly from 16.41 MMSCF/month to 15.82 MMSCF/month to ensure compliance with Rule 359. The attached EOF Rule 359 Maximum Flaring Worksheet shows the revised flaring heat input limit based on revised flaring volumetric limit going from 221,749 MMBtu/Yr at 17% CO2 inlet gas to 213,734 MMBtu/Yr at 20% CO2 inlet gas.

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: Yes No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

- Yes No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

10. PROJECT STATUS:

- A. Date of Equipment Installation

- B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210. Yes No

- C. Is this application being submitted due to the loss of a Rule 202 exemption? Yes No

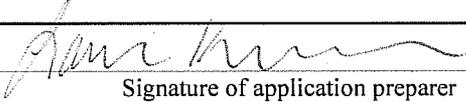
- D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. Yes No

- E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. Yes No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

 Signature of application preparer	Sep 9, 2009 Date
Laura Kranzler Print name of application preparer	Venoco, Inc. Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

- Application Filing Fee (Fee = \$335. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.

- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01t.pdf>

- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf>

- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's *Process/Equipment Summary Forms* (<http://www.sbcapcd.org/eng/dl/dl01.htm>) that apply to the project.

- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>

- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, , am employed by or represent
Type or Print Name of Authorized Company Representative

Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By: Title:

Date: Phone:

Signature of Authorized Company Representative

**PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL
RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.**

STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: Venoco Inc.

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Venoco – Ellwood Onshore Facility
2. Four digit SIC Code: 1310 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): Venoco Inc.
4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Suite 100, Carpinteria, CA 93013
5. Street Address of Source Location (include Zip Code): 7979 Hollister Ave., Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line Yes No
50 miles of a Native American Nation Yes No Not Applicable
8. Type of Organization: Corporation Sole Ownership Government
 Partnership Utility Company
9. Legal Owner's Name: Venoco Inc.
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Ed O'Donnell Title: Senior Vice President Telephone #: 805-745-2100
12. Plant Site Manager/Contact: Jeff MacDonald Title: Senior Operations Supervisor Telephone #: 805-961-2301
13. Type of facility: Oil and Gas Processing Plant
14. General description of processes/products: Crude Oil and Natural Gas Production
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Ellwood Onshore Facility

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario: Increase inlet gas CO2 limit at EOF from 17% to 20%, and decrease volumetric flaring limit correspondingly from 16.41 MMSCF/month to 15.82 MMSCF/month to ensure compliance with Rule 359. In addition, decrease the flaring heat input limit from 221,749 MMBtu/yr to 213,734 MMBtu/yr.

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	16.21	16.48	(0.27) (x.xx) = negative value
ROC	89.18	89.19	(0.012)
CO	85.02	86.84	(1.82)
PM	2.69	2.75	(0.06)
PM-10	2.69	2.75	(0.06)
SOx	7.92	8.05	(0.13)

* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

CERTIFICATION STATEMENT
(Form 1302-M continued)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Ellwood Onshore Facility

List Other Forms or Attachments (cont.)

Revised Flare Volume Minimization and Monitoring Plan
Revised Flare Monitoring Plan

Ellwood Onshore Facility
Rule 359 Maximum Flaring Worksheet

With 20% CO₂ EOF Inlet

Based on Venoco historical data, flared gas HHV = CO ₂ * Slope + Intercept			
Slope =	-1221.4	Ref 1	
Intercept =	1126.1	Ref 2	
Result is accurate +/- 5% as shown by the chart on Page 7, "EOF Sweet Gas Streams 2001, 2002 & 2003"			
Solving for CO ₂ , the equation is rearranged to:		CO ₂ = (HHV - Intercept) / Slope	
Average HHV of EOF gas streams minus CO ₂			
Intercept from Ref 2 =	1,126.1 Btu/SCF	Ref 3	
Flare Gas CO ₂ Concentration based on Assumed HHV			
(Ref 3 - Ref 2) / Ref 1 =	0% CO ₂	Ref 4	
Inlet gas CO ₂ content			
Updated for current Holly higher CO ₂ values =	20% CO ₂	Ref 5	
Daily Gas Processing Limit, Dry Gas			
PTO 9.D.13.b =	13.0 MMSCFD	Ref 6	
Non-CO ₂ Processing Limit corresponding to Inlet Gas CO ₂ % presented in Ref 5. Not an enforceable limit, used only for calculating maximum volumetric flaring monthly limit.			
Ref 6 * (1- Ref 5) =	10.4 MMSCFD	Ref 7	
Non-CO ₂ Flaring Limit			
Rule 359 =	5%	Ref 8	
Current Volumetric Flaring Limit.			
PTO 9.C.2(b)(iii), Ref 7 * Ref 8 * 365 Days / Year / 12 Months / Year =	16.41 MMSCF/Mo	Ref 9	
Current Annual Heat Input Limit			
PTO 9.C.2.(b)(ii), Ref 9 * Ref 6 Btu/SCF =	221,749 MMBtu/Yr	Ref 10	
New Non-CO ₂ Flaring Limit based on Revised Inlet CO ₂			
Ref 7 * Ref 8 * 365 Days / Year =	15.82 MMSCF/Mo	Ref 11	
Revised Flaring Heat Input Limit Based on Revised Flaring Volumetric Limit			
Ref 3 * Ref 11 =	213,734 MMBtu/Yr	Ref 12	
Annual Heat Input Revision			
Ref 12 - Ref 10 =	(8,015) MMBtu/Yr	Ref 13	
Total Flaring Annual Heat Input Limit, Existing Limit per ATC 10941 Table 9-3 + Increased Annual Heat Input			
Ref 10 + Ref 13 =	213,734 MMBtu/Yr	Ref 14	

Emissions Adjustment for Increasing CO₂ to 20% at EOF Inlet

Based on Venoco historical data, flared gas HHV can be predicted by the equation:

$$\text{HHV} = \% \text{CO}_2 * \text{Slope} + \text{Intercept}$$

$$\text{Slope} = -1221.4 \quad \text{Intercept} = 1126.1$$

Result is accurate +/- 5% as shown by the chart "EOF Sweet Gas Streams 2001, 2002 & 2003"

Inlet gas CO ₂ content for this calculation =	20%
Current non-CO ₂ Volumetric Flaring Limit, 5% of 10.79 MMSCFD =	16.41 MMSCF/Mo
Current Annual Heat Input Limit, Based on Volumetric Flaring Limit, 1126.1 Btu/SCF =	221,749 MMBtu/Yr
Proposed non-CO ₂ Volumetric Flaring Limit at 5% of non-CO ₂ Inlet =	15.82 MMSCF/Mo

Flared Gas			New Annual Planned Flaring Limit		
CO ₂	HHV	MMSCF/Mo ¹	MMBtu/Yr ²	MMBtu/Day ³	MMBtu/Hr ³
0.0%	1,126.1	15.82	213,734	585.57	24.40

Additional Flaring Heat Input and Criteria Pollutants, tpy						
Emission Factors, lb/MMBtu	0.0680	0.0030	0.4530	0.0314	0.0140	0.0140
MMBtu/Yr Additional ⁴	NOX	ROC	CO	SO2	PM	PM10
(8,015)	(0.27)	(0.012)	(1.82)	(0.13)	(0.06)	(0.06)

Notes:

- 1 MMSCF/Mo = Proposed non-CO₂ Flaring Limit based on 5.0% of non-CO₂ plant inlet
- 2 MMBtu/Yr = MMSCF/Mo of non-CO₂ flaring / (1 - Flare CO₂) * HHV * 12.
- 3 **MMBtu/Day and MMBtu/Hr are for reference only. Existing PTO 7904-R8 limits to remain.**
- 4 MMBtu/Yr Additional = New Annual Planned Flaring Limit - Current Annual Heat Input Limit

CO₂ Balance Protocol with 20% Maximum Inlet CO₂ at EOF Inlet

Convert Flare Gas HHV and Volume Flow to non-CO₂ Basis when 2nd Stage CO₂ Removal Unit Operating

TABLE 1

Establish Maximum non-CO ₂ Flaring Volume			
Maximum Plant Inlet Rate =	13 MMSCFD	ref a	
Maximum Plant CO ₂ , Annual Basis =	20%	ref b	
Monthly Inlet non-CO ₂ Equivalent = ref a * (1 - ref b) * 365 / 12 =	316.33 MMSCF/Mo	ref c	
Monthly Maximum non-CO ₂ Flaring Volume =	5.0% of Inlet	ref d	
Max non-CO ₂ Flaring Volume ref c * ref d =	15.82 MMSCF/Mo	ref e	

Determine Flaring non-CO₂ Volume and Equivalent HHV

Flare samples taken weekly: Inplant Fuel Gas, 1st Stage Permeate, 2nd Stage Permeate
 Each sample determines HHV and CO₂ content to be used for the week's flare calculations.
 Use process set below to determine HHV and volume flow to H-205 on a non-CO₂ basis

TABLE 2

Inplant Fuel Gas Flow measured daily, HHV and CO ₂ per weekly samples			
Measured Flow from FR-081 =	150 MSCFD	ref 1	
Measured HHV =	1,050 Btu/SCF	ref 2	
Measured CO ₂ =	10%	ref 3	
non-CO ₂ Flow = ref 1 * (1 - ref 3) =	135 MSCFD	ref 4	
non-CO ₂ HHV = ref 2 / (1 - ref 3) =	1,167 Btu/SCF	ref 5	

TABLE 3

1 st Stage Permeate Gas Flow measured daily, HHV and CO ₂ per weekly samples			
Measured Flow from FR-567 =	10 MSCFD	ref 6	
HHV from Weekly Sample =	780 Btu/SCF	ref 7	
CO ₂ from weekly Sample =	30%	ref 8	

TABLE 4

2 nd Stage Permeate Gas Flow measured daily, HHV and CO ₂ per weekly samples			
Measured Flow from FR-563 =	650 MSCFD	ref 9	
HHV from Weekly Sample =	370 Btu/SCF	ref 10	
CO ₂ from weekly Sample =	65%	ref 11	

TABLE 5

Combined Permeate Gas Flow Properties to be used for Flare Gas			
Flare Gas Flow measured by FR-080 =	700 MSCFD	ref 12	
Combined Permeate Flow to Flare = ref 6 + ref 9 =	660 MSCFD	ref 13	
Deviation from FR-080 = (ref13 - ref 12) / ref 12 =	-6%	ref 14	
Combined Permeate to Flare HHV = (ref 6 * ref 7 + ref 9 * ref 10) / ref 13 =	376 Btu/SCF	ref 15	
Combined Permeate to Flare CO ₂ = (ref 6 * ref 8 + ref 9 * ref 11) / ref 13 =	64%	ref 16	
non-CO ₂ Flow = ref 12 * (1 - ref 16) =	235 MSCFD	ref 17	
non-CO ₂ HHV = ref 15 / (1 - ref 16) =	1,059 Btu/SCF	ref 18	

TABLE 6

Total non-CO ₂ Flared			
non-CO ₂ Flow = ref 4 + ref 17	370 MSCFD	ref 19	
non-CO ₂ HHV = (ref 4 * ref 5 + ref 17 * ref 18) / ref 19	1,098 Btu/SCF	ref 20	

Flaring volume and heat input will be tracked daily.
 Daily results will be accumulated in a master spreadsheet to ensure compliance with annual limits.