



**Santa Barbara County
Air Pollution Control District**

JUL 29 2011

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 03321
Permit: P 13397
SSID: 02667

Re: Proposed Minor Permit Modifications to BreitBurn Energy Company Newlove Lease Part 70/APCD PTO 08240-R7

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 13397 for modifications to Part 70/APCD PTO 08240-R7. Included with the proposed permit is a copy of the application submitted by the applicant for this modification. We plan to issue this minor permit modification as final after September 19, 2011 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Stefanie M. Boehme of my staff at (805) 961-8810.

Sincerely,



Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTO 13397
Application forms for Minor Modifications to BreitBurn Energy Company New Love Lease

cc: New Love Lease Project File SC
ECD Chron File
Ben Ellenberger (cover letter only)
Stefanie Boehme (cover letter only)

\\sbcapcd.org\shares\Groups\ENGR\WP\Oil&Gas\Breitburn Orcutt\Newlove Lease\PTOs\PTO 13397\PTO 13397 - EPA Letter - 4-22-2011.doc



Part 70 Minor Modification 13397
and
Permit to Operate 13397

Page 1 of 10

EQUIPMENT OWNER/OPERATOR:

BreitBurn Energy Company LP

300000

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:

Oil, water and gas are produced from wells on the Newlove Lease. Electric motors or internal combustion engines (permitted under PTO 8039) drive the wells. The collected vapors and gas from the gas gathering system is scrubbed to remove hydrogen sulfide. The gas is then sent to the Orcutt Hill Compressor Plant.

CONDITIONS:

9.A Standard Administrative Conditions

The following federally-enforceable administrative permit conditions apply to the Newlove Lease:

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.
- 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 **Permit Life.** The Part 70 permit shall become invalid three years from the date of issuance unless a timely and complete renewal application is submitted to the APCD. Any operation of the source to which this Part 70 permit is issued beyond the expiration date of this Part 70 permit and without a valid Part 70 operating permit (or a complete Part 70 permit renewal application) shall be a violation of the CAAA, § 502(a) and 503(d) and of the APCD rules.

The permittee shall apply for renewal of the Part 70 permit not later than 6-months before the date of the permit expiration. Upon submittal of a timely and complete renewal application, the Part 70 permit shall remain in effect until the Control Officer issues or denies the renewal application. [Re: APCD Rule 1304.D.1]

A.6 **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.7 **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 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.8 **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.9 **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.10 **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 the permittee and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

A.11 **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.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.13 **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 with the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- A.14 **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- A.15 **Compliance.** Nothing contained within this permit shall be construed to allow the violation of any local, State or Federal rule, regulation, ambient air quality standard or air quality increment.

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.

- 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 **Visible Emissions (Rule 302):** The permittee shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
 - (a) As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart, as published by the United States Bureau of Mines, or
 - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above. [Re: APCD Rule 302]
- B.3 **Nuisance (Rule 303):** No pollutant emissions from any source at the BreitBurn Orcutt Stationary Source 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.4 **Specific Contaminants (Rule 309):** The permittee shall not discharge into the atmosphere from any single source sulfur compounds and combustion contaminants (particulate matter) in excess of the applicable standards listed in Sections A through E of Rule 309. [Re: APCD Rule 309].
- B.5 **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.3 of this permit. [Re: APCD Rule 317]
- B.6 **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.3 of this permit and facility inspections. [Re: APCD Rule 322]
- B.7 **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.3 of this permit and facility inspections. [Re: APCD Rules 323, 317, 322, 324]
- B.8 **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.3 of this permit and facility inspections. [Re: APCD Rule 324]
- B.9 **Emergency Episode Plans (Rule 603):** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [Reference APCD Rule 603]
- B.10 **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]
- B.11 **CARB Registered Portable Equipment:** State registered portable equipment shall comply with State registration requirements. A copy of the State registration shall be readily available whenever the equipment is at the facility. [Re: APCD Rule 202]

9.C Requirements and Equipment Specific Conditions

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting for each specific equipment group. This section may also contain other non-generic conditions. The following condition is added to Part-70/PTO 8240-R7. All other permit conditions remain unchanged and in full force.

C.11 **Hydrogen Sulfide Scrubber.** The following equipment is included in this emissions unit category:

Dev No	Equipment
113142	Vertical, 13 feet high by 4 feet in diameter. Uses Sulfa Scrub or equivalent to remove hydrogen sulfide from produced gas.
113144	Valves - Gas Service: 15 clps
113145	Flanges/Connections - Gas Service: 69 clps
113146	Pressure Safety Valves - Gas Service: 1clp

- (a) **Emission Limits:** The mass emissions from the equipment permitted herein shall not exceed the values listed in the attached emission tables. Compliance shall be based on the operational, monitoring, recordkeeping and reporting conditions of this permit.
- (b) **Operational Limits:** The permitted equipment is subject to the following operational restrictions:
 - (i) **Gaseous Fuel Sulfur Limit.** The total sulfur content (calculated as H₂S at standard conditions, 60° F and 14.7 psia) of the gaseous fuel burned at the stationary source (with the exception of the diatomite project) shall not exceed 50 grains per 100 cubic feet (796 ppm_v). In order to ensure that this limit is not exceeded, the operator shall:
 - a Measure the H₂S content of the fuel gas on a quarterly basis using Draeger tubes or an District-approved equivalent.
 - b If the Draeger tube measurement indicates an H₂S content greater than 637 ppm_v, the permittee shall measure the total sulfur content of the gaseous fuel within one week of the Draeger tube measurement in accordance with ASTM-D1072 or a District approved equivalent method.
 - c Records shall be kept on site and made available for inspection by the District upon request.
 - (ii) **I&M Program.** The District-approved I&M Plan dated August 30, 2005 (approved by the District on September 27, 2005) and any updates shall be implemented for the life of the project. The Plan, and any subsequent District 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 District for review and approval within one calendar quarter whenever there is a change in the component list or diagrams.

- (c) Monitoring: The permitted equipment is subject to the following monitoring requirements:
- (i) The hydrogen sulfide (H₂S) content of the gaseous fuel burned on the stationary source (with the exception of the diatomite project) shall be measured on a quarterly basis.
 - (ii) The equipment listed in this permit is subject to all the monitoring requirements listed in District Rule 331.F. The test methods in Rule 331.H shall be used, when applicable.
- (d) Recordkeeping: The following records shall be maintained by the permittee and shall be made available to the District upon request:
- (i) Measurements of the total sulfur content (as H₂S) of the field gas in accordance with the *Monitoring* condition of this permit.
 - (ii) All inspection and repair records shall be retained at the source for a minimum of five years. The equipment listed in this section is subject to all the recordkeeping requirements listed in District Rule 331.G.
- (e) Recordkeeping: The permittee shall submit a report to the District every six months to verify compliance with the emission limits and other requirements of this permit. 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 1st and March 1st, respectively, each year, and shall be in a format approved by the District. All logs and other basic source data not included in the report shall be available to the District upon request. The second report shall also include an annual report for the prior four quarters. The report shall include the following information:
- (i) The recorded sulfur content, in parts per million by volume, of the gaseous fuel burned on the stationary source.
 - (ii) Rule 331 fugitive hydrocarbon I&M program data:
 - inspection summary.
 - record of leaking components.
 - record of leaks from critical components.
 - record of leaks from components that incur five repair actions within a continuous 12-month period.
 - record of component repair actions including dates of component re-inspections.

Note: If the data required by this condition is reported in the Annual Report for other permits for the Orcutt Hill Stationary Source, a separate report is not required for this permit.

9.D District-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 District and the State of California. These conditions are issued pursuant to District 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 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.

D.1 Permit Activation. All aspects of this permit are enforceable by the District 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 District and these comments require no modification to this permit. The District 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 District's letter.
- (b) After the USEPA has provided the District written comments that require a modification to this permit, the District 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

JUL 29 2011

DATE

Attachments:

- Permit Equipment List
- Table 1 – PTO 13397 Permitted Emissions
- Table 2 – Project Emissions and Offsets
- Emission Tables 5.1 through 5.3
- Permit Evaluation for Permit to Operate 13397

Part 70 Minor Modification13397 / Permit to Operate 13397

Page 10 of 10

Notes:

- This permit supersedes ATC 13397
- Reevaluation due date: April 26, 2014

\\\\sbcapcd.org\shares\Groups\ENGR\WP\Oil&Gas\Breitburn Orcutt\Newlove Lease\PTOs\PTO 13397\PTO 13397 - Final Permit -4-22-2011.doc

PERMIT EQUIPMENT LIST

PTO 13397 / FID: 03321 Newlove Lease / SSID: 02667

A PERMITTED EQUIPMENT

1 Hydrogen Sulfide Scrubber

<i>Device ID #</i>	113142	<i>Device Name</i>	Hydrogen Sulfide Scrubber
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease - Serving compressor K-4		
<i>Device Description</i>	Vertical, 13 feet high by 4 feet in diameter. Uses Sulfa Scrub or equivalent to remove hydrogen sulfide from produced gas.		

2 Fugitive Hydrogen Components

2.1 Valves - Gas Service

<i>Device ID #</i>	113144	<i>Device Name</i>	Valves - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	15 clps		

2.2 Flanges/Connections - Gas Service

<i>Device ID #</i>	113145	<i>Device Name</i>	Flanges/Connections - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	69 clps		

2.3 Pressure Safety Valves - Gas Service

<i>Device ID #</i>	113146	<i>Device Name</i>	Pressure Safety Valves - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	1 clp		

Table 1
PTO 13397 - Total Permitted Emissions

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	--	--	--	--	--
Pits and Sumps	--	--	--	--	--	--
Fugitive Components	--	0.04	--	--	--	--
	0.00	0.04	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	--	--	--	--	--
Pits and Sumps	--	--	--	--	--	--
Fugitive Components	--	0.99	--	--	--	--
	0.00	0.99	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	--	--	--	--	--
Pits and Sumps	--	--	--	--	--	--
Fugitive Components	--	0.05	--	--	--	--
	0.00	0.05	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	--	--	--	--	--
Pits and Sumps	--	--	--	--	--	--
Fugitive Components	--	0.18	--	--	--	--
	0.00	0.18	0.00	0.00	0.00	0.00

Table 2
PTO 13397 - New Hydrogen Sulfide Scrubber
Project Emissions and Offsets

REACTIVE ORGANIC COMPOUNDS (ROC)

NEI FROM PROJECT

	<u>TPQ</u>	<u>TPY</u>
New Hydrogen Sulfide Scrubber	0.05	0.18

EMISSION REDUCTION SOURCES

	Emission Reductions		Distance <u>Factor</u>	Offset Credit	
	<u>TPQ</u>	<u>TPY</u>		<u>TPQ</u>	<u>TPY</u>
NOx ERCs From Certificate 0172-0514 ^{(a) (b)}	0.054	0.216	1.2	0.045	0.180

Notes:

- (a) ERCs are used to offset ROC emissions with a 1.2 distance factor.
ERCs are created from within the same stationary source.
The offset ratio of 1.2 is used per Rule 802 Table 4.
- (b) Interpollutant trade. NOx ERCs used to offset ROC emissions with a 1.0 interpollutant trade factor.
- (c) ERCs generated from the electrification of seventeen gas fired engines at the Orcutt Hill Stationary Source.
- (d) Emission units: TPQ = tons per quarter; TPY = tons per year.
- (e) Determination of offset ratio ("distance factor"):

**Table 5.1-1
BreitBurn Newlove Lease: Permit to Operate 13397
Operating Equipment Description**

Equipment Category	Description	Dev No	Feed	Device Specifications				Usage Data				Maximum Operating Schedule				References
				Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr	year			
Tanks	Wash Tank	002973	OW	2,420	3,000 bbls	3,000 bbls	3,000 bbl/day	1.0	1.0	24	2,190	8,760	A			
	Wash Tank	109949	OW	2,420	3,000 bbls	3,000 bbls	3,000 bbl/day	1.0	1.0	24	2,190	8,760	A			
	Wash Tank	002979	OW	2,420	3,000 bbls	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 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			
Pits and Sumps	Well Cellars	003041	OW	Service	1,044 ft ²	—	—	1.0	1.0	24	2,190	8,760	B			
	Pits	Note A	OW	Secondary	75 ft ²	—	—	1.0	1.0	24	2,190	8,760	B			
	Spill Catch Pan	101177	OW	Primary	5 ft ²	—	—	1.0	1.0	24	2,190	8,760	B			
Fugitive Components (b)	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 (c)	Valves	—	—	Gas	418 clips	—	—	1.0	1.0	24	2,190	8,760				
	Flanges/Connections	—	—	Gas	2,775 clips	—	—	1.0	1.0	24	2,190	8,760				
	Pressure Safety Valves	—	—	Gas	1 clips	—	—	1.0	1.0	24	2,190	8,760				
	Valves	—	—	Oil	389 clips	—	—	1.0	1.0	24	2,190	8,760				
	Flanges/Connections	—	—	Oil	2,293 clips	—	—	1.0	1.0	24	2,190	8,760				
	Pump Seals	—	—	Oil	44 clips	—	—	1.0	1.0	24	2,190	8,760				

Notes: Device Number Pits are 101173, 101174, 101175, 101178, 101184, 101185

(a) These Tables do not include Newlove Diatomite equipment emissions. See PTO 8240-R7, the latest reevaluated permit for the Newlove Lease.

(b) CARB-KVB Method

(c) Component Leak Path Method

**Table 5.1-2
BreitBurn Newlove Lease: Permit to Operate 13397
Equipment Emission Factors**

Equipment Category	Description	Dev No	NO _x	ROC	CO	SO _x	PM	PM ₁₀	Units
Tanks	Wash Tank	002973	--	0.0006	--	--	--	--	lb/ft ² -day
	Wash Tank	109949	--	0.0006	--	--	--	--	lb/ft ² -day
	Wash Tank	002979	--	0.0282	--	--	--	--	lb/ft ² -day
	Crude Tank	002974	--	0.0126	--	--	--	--	lb/ft ² -day
	Wastewater Tank	110332	--	0.0941	--	--	--	--	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 A	--	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/cip/day
	Flanges/Connections		--	0.0043	--	--	--	--	lbs/cip/day
	Pressure Safety Valves		--	0.4135	--	--	--	--	lbs/cip/day
	Valves		--	0.0005	--	--	--	--	lbs/cip/day
	Flanges/Connections		--	0.0002	--	--	--	--	lbs/cip/day
	Pump Seals		--	0.0004	--	--	--	--	lbs/cip/day

See attached worksheets for emission factors.

Table 5.1-3
BreitBurn New/love Lease: Permit to Operate 13397
Hourly and Daily Emissions

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability Basis	
			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 A	--	--	0.04	0.94	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.50	--	--	--	--	--	--	--	--	--	--
Fugitive Components	Valves, Connections, etc	002980	--	--	2.17	52.19	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.04	1.01	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves		--	--	0.32	7.65	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.50	12.04	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.02	0.41	--	--	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.01	0.18	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.02	0.51	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.02	--	--	--	--	--	--	--	FE	ATC 13140	

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

Table 5.1-4
BreitBurn Newlove Lease: Permit to Operate 13397
Quarterly and Annual Emissions

Equipment Category	Description	Dev No	NO _x		CO		SO _x		PM		PM ₁₀		Enforceability	
			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 A	--	--	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		--	--	0.35	1.40	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.55	2.20	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.02	0.08	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.01	0.03	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.02	0.09	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.00	--	--	--	--	--	--	FE	ATC 13140

Notes:
A = AFCD enforceable emission limit.
FE = Federally enforceable emission limit.

**Table 5.2
BreitBurn Newlove Lease: Permit to Operate 13397
Total Permitted Facility Emissions**

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	-	0.12	-	-	-	-
Pits and Sumps	-	1.29	-	-	-	-
Fugitive Components	-	3.08	-	-	-	-
	0.00	4.50	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	-	2.97	-	-	-	-
Pits and Sumps	-	30.91	-	-	-	-
Fugitive Components	-	74.01	-	-	-	-
	0.00	107.90	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	-	0.14	-	-	-	-
Pits and Sumps	-	1.41	-	-	-	-
Fugitive Components	-	3.38	-	-	-	-
	0.00	4.92	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	-	0.54	-	-	-	-
Pits and Sumps	-	5.64	-	-	-	-
Fugitive Components	-	13.51	-	-	-	-
	0.00	19.69	0.00	0.00	0.00	0.00

Table 5.3
BreitBurn Newlove Lease: Permit to Operate 13397
Federal Potential To Emit

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.12	--	--	--	--
Pits and Sumps	--	1.29	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.87	--	--	--	--
	0.00	2.29	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

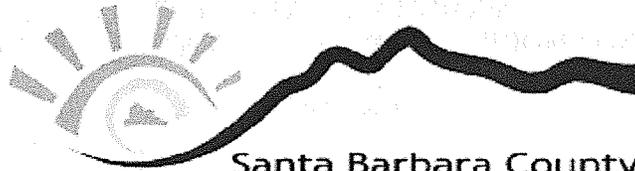
Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	2.97	--	--	--	--
Pits and Sumps	--	30.91	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	20.81	--	--	--	--
	0.00	54.71	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.14	--	--	--	--
Pits and Sumps	--	1.41	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.95	--	--	--	--
	0.00	2.51	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.54	--	--	--	--
Pits and Sumps	--	5.64	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	3.80	--	--	--	--
	0.00	9.99	0.00	0.00	0.00	0.00



**Santa Barbara County
Air Pollution Control District**

**PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13397 / PERMIT TO OPERATE 13397**

Page 1 of 5

1.0 BACKGROUND

1.1 General: The application for Permit to Operate 13397 was received on November 3, 2010. This permit is to operate a new hydrogen sulfide scrubber serving the K-4 compressor on the Newlove Lease. An SCDP inspection was conducted on September 30, 2010 and no violations were documented.

1.2 Permit History:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PT-70/Reeval 08240 R7	06/02/2009	Three year reeval
ATC 13134	06/15/2009	Increase throughput from 1,100 BOPD to 3,000 BOPD and replace the VRU compressor to accommodate this increase.
ATC 13000	07/17/2009	50 MMBtu Thermal Oxidizer used to combust gas diverted from the steam generators and excess produced gas.
PTO 13141	08/26/2009	Permit 4 new wells at the Diatomite Project.
PT-70 R 13275	08/26/2009	See PTO 13134
ATC 13140	12/02/2009	Permit for 26 Sx sands wells and 3 Monterey wells on the Newlove Lease. Also included is an automatic well tester and related piping. The equipment in this permit was previously claimed as de minimis by BreitBurn, but since the work was done as a project, a permit was required and considered NEI.
ATC 13230	12/29/2009	Eighteen additional new oil & gas wells on the Newlove Lease for future expansion.
ATC 13397	06/16/2010	New H2S scrubber serving Compressor K-4.
PTO 13140	07/19/2010	Permit for 26 Sx sands wells and 3 Monterey wells on the Newlove Lease. Also included is an automatic well tester and related piping. The equipment in this permit was previously claimed as de minimis by BreitBurn, but since the work was done as a project, a permit was required and considered NEI.
PTO 13134	07/19/2010	PTO for throughput increase and new VRU compressor. See PT-70 R 13275
ATC 13513	11/04/2010	New loading rack for non-diatomite crude.
ATC Mod 12084 03	11/05/2010	Modify Phase 2.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13397 / PERMIT TO OPERATE 13397

Page 2 of 5

1.3 Compliance History:

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	9548	2/24/2010	The fuel gas to the steam generator was found to contain 24 ppm total sulfur. The limits is 23ppm total sulfur.
NOV	9547	2/24/2010	No gas sample was taken for analysis during the 3 rd quarter of 2009.
NOV	9563	8/13/2010	A sample valve was left open on a tank. When the tank filled, a spill was the result. A Deviation Report was submitted as an e-mail attachment on August 06,2010
NOV	9696	12/17/2010	The source has constructed and operated 44 Seep Cans and 3 Baker Tanks without the benefit of a District issued permit.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: Oil, water and gas are produced from wells on the Newlove Lease. Electric motors or internal combustion engines (permitted under PTO 8039) drive the wells. The collected vapors and gas from the gas gathering system is scrubbed to remove hydrogen sulfide. The gas is then sent to the Orcutt Hill Compressor Plant.

2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with District Rule 331. An 80-percent reduction is applied to valves, fittings, and wellheads for implementation of Rule 331.

2.3 Emission Factors: Emission factors are documented in the attached emission calculation worksheets.

2.4 Reasonable Worst Case Emission Scenario: The operating scenario is summarized as follows:

- Permitted equipment operates 24 hrs/day, 365 days/yr.
- Fuel gas sulfur content (as H₂S) does not to exceed 796 ppmv.
- An 80% ROC emission reduction is applied to valves, connections, and fittings for implementation of Rule 331.

2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Emission Calculations Attachment. 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.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13397 / PERMIT TO OPERATE 13397

Page 3 of 5

- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the sulfur content of gas burned on the stationary source and the parameters required by District Rule 331.G.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the District.

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 201. Permits Required
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 309. Specific Contaminants
- Rule 310. Odorous Organic Sulfides
- Rule 311. Sulfur Content of Fuels
- Rule 325. Crude Oil Production and Separation
- Rule 331. Fugitive Emissions Inspection and Maintenance
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: None

- 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). The fugitive hydrocarbon emissions from the new scrubber contribute to the NEI for the Newlove Lease.

5.0 AQIA

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

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13397 / PERMIT TO OPERATE 13397

Page 4 of 5

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are exceeded for this stationary source. ERCs have been surrendered in the amount of 0.054 tons/quarter to cover the project's ROC emissions liability. See Table 2 of the permit.

6.2 ERCs: This permitting action 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 District (revised November 16, 2000). This permit is for a one new hydrogen sulfide scrubber which reduces the sulfur content of gas burned on the stationary source. Projects to install air pollution control or abatement equipment are exempt from CEQA per Appendix A of District CEQA Guidelines. This project has no potential for causing a significant adverse environmental impact.

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/COMMENTS ON DRAFT PERMIT

This project was not subject to public notice. Ms. Marianne Strange provided comments on the draft version of this permit in a March 8, 2011 email. Based on her comments the Administrative and Generic Conditions of the permit were corrected to be more consistent with PT70 8240-R7 and PTO 13408.

Additionally, she commented: Condition C.11 is the first condition in this section, should it be C.1? The same condition requires quarterly draeger tubes for all fuel burning equipment. BreitBurn is assuming that this sample is taken at the compressor plant fuel gas meter 2750. All gas delivered to the field as fuel is metered at this point.

The District responded: C.11 gives the location of the condition in PTO PT70 9029-R5 and is correct. Gas samples for sulfur analysis must be taken at a point that is representative of the gas burned at the source.

11.0 FEE DETERMINATION

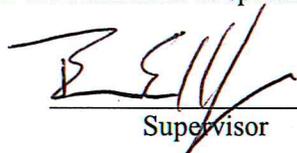
Fees for the District's work effects are assessed on a fee basis. The Project Code is 300000 (*Onshore Oil and Gas Lease*). See the *Fee Statement Attachment* for the fee calculations.

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

Stefanie Boehme
AQ Engineer

04/22/2011
Date


Supervisor


Date

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13397 / PERMIT TO OPERATE 13397

Page 5 of 5

13.0 ATTACHMENTS

- Figures & Tables
- Fee Statement

Facility Emissions Summary
Newlove Lease FID 3321

I. This Projects "I" 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
A12084-03	11/04/10	-49.50	-9.03	-52.06	-7.44	-85.50	-15.60	-16.66	-3.04	-27.00	-4.93	-27.00	-4.93
A12084-03	11/04/10	33.00	6.02	34.22	5.29	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	12/29/09			7.28	1.33								
A13397	06/16/10			0.99	0.18								
A13513	11/4/2010			4.87	0.095								
Totals		50.57	7.69	64.58	9.91	101.57	14.64	15.00	2.40	42.05	5.58	42.05	5.58

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 "I"	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	50.57	7.69	64.58	9.91	101.57	14.64	15.00	2.40	42.05	5.58	42.05	5.58
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	37.42	6.82	61.66	9.51	68.21	12.45	12.08	2.21	24.05	4.40	24.05	4.40

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.

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

Facility FNEI-90 at this SSN

Facility No.	Facility Name	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	Cal Coast	0.00	0.00	11.72	0.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3313	Fox	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	Dome	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	Folsom	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	Graciosa	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	Hartnell	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	Hobbs	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	Newlove	37.42	6.82	61.66	9.51	68.21	12.45	12.08	2.21	24.05	4.40	24.05	4.40
3322	Pinal	0.00	0.00	12.32	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3323	Rice Ranch	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	Squires	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	Getty-Hobbs	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	Comp Plant	0.00	0.00	7.17	1.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4214	ICEs	11.04	0.24	0.60	0.01	9.27	0.21	0.58	0.01	0.06	0.01	0.11	0.01
10482	Steam Gens	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	MVFF	0.00	0.00	0.20	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		54.51	8.15	100.03	12.52	87.97	14.57	14.70	2.59	27.42	5.01	27.47	5.01

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.

Attachment
Fee Statement

FEE STATEMENT

PTO No. 13397

FID: 03321 Newlove Lease / SSID: 02667



Santa Barbara County
Air Pollution Control District

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
113142	Hydrogen Sulfide Scrubber	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
113144	Valves - Gas Service	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
Device Fee Sub-Totals =									\$123.14	\$0.00	\$0.00	\$123.14
Device Fee Total =												

Permit Fee

Fee Based on Devices

123.14

Fee Statement Grand Total = \$123

Notes:

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

