



2.38.2

**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
- Change in Location
- Other (Specify)
- Transfer of Ownership (use form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known) ATC 13230

Yes No Are Part 70 Minor Modification Forms Attached? (this applies to Part 70 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title V Form -1302 A1/A2, B, and M. Complete Title V 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 below.

2. FILING FEE:

A \$341 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 emission increase, submit a completed Form -03 (*School Summary Form*). <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf> Yes No.

If yes, provide 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	3321	PERMIT NO. PTO 13230	<div style="border: 2px solid blue; padding: 5px; text-align: center;"> <p style="color: blue; font-weight: bold; font-size: 1.2em;">RECEIVED</p> <p style="color: red; font-weight: bold; font-size: 1.2em;">JUN 29 2011</p> <p style="color: blue; font-weight: bold; font-size: 1.2em;">SBCAPCD</p> </div>
PROJECT NAME	Newlove Lease		
FILING FEE	341.00	202.E? YES / NO	

CC# 9258 Marianne Strange

5. COMPANY/CONTACT INFORMATION:

<i>Owner Info</i>		[] Yes [X] No		Use as Billing Contact?	
Company Name		BreitBurn Energy Company			
Doing Business As					
Contact Name		Martha Brock			
Position/Title		Environmental Health and Safety Director			
Mailing Address		515 S. Flower Street, Ste. 4800			
City:	Los Angeles	State	CA	Zip	90071
Tel #	213-225-5900	Fax #		E-mail	

<i>Operator Info</i>		[XX] Yes [] No		Use as Billing Contact?	
Company Name		BreitBurn Energy Company			
Doing Business As					
Contact Name		Dick Hart			
Position/Title		Western Division Manager			
Mailing Address		1555 Orcutt Hill Road			
City:	Orcutt	State	CA	Zip	93455
Tel #	805-937-2198	Fax #		E-mail	Dick.Hart@BreitBurnEnergy.Com

<i>Authorized Agent Info*</i>		[] Yes [X] No		Use as Billing Contact?	
Company Name		M. F. Strange & Associates, Inc.			
Contact Name		Marianne Strange			
Position/Title		Agent for BreitBurn Energy Company			
Mailing Address		PO Box 1484			
City:	Santa Barbara	State	CA	Zip	93102
Tel #	805-564-6590	Fax #	805-564-8007	E-mail	mfsa@silcom.com

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

SEND PERMITTING CORRESPONDENCE TO (check all that apply):	
[X] Owner	[] Operator
[X] Authorized Agent	[] 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 township, range, and section.

Equipment Address: 1555 Orcutt Hill Road

City: Orcutt

State: CA

Zip Code: 93455

Work Site Phone: 805-937-2576

[] Incorporated (within city limits) [X] Unincorporated (outside city limits) [] Used at Various Locations

Assessors Parcel No(s): APN 101 020 41

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):

BreitBurn Energy (BreitBurn) has received ATC 13230 for 18 new wells. To date, there are seven wells that have been drilled, wells 400, 401, and 402 are idle, 327 and 328 are active, and 236 and 329 were unsuccessful and have been plugged and abandoned.

- NL 400 NL 236
- NL 401 NL 327
- NL 402 NL 328
- NL 329

BreitBurn has applied to extend this SCDP date one year until March 21, 2012. This extension was requested to allow BreitBurn to drill five (5) wells budgeted in 2011. In response to the application, the District has requested that a PTO application is submitted for the active wells and the ATC mod would be applied to the remaining 11 wells that are permitted under ATC 13230.

This project requires ERC's-BreitBurn Energy included the original ERC Certificate #0005 for this project. Based on the component count and calculated emissions, the total amount of ERC required for the 5 wells is 0.121 tons per quarter.

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY* PERMIT(S) FOR THE PROJECT DESCRIBED IN THIS APPLICATION? [] Yes [X] No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	App./ Permit Date
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Which is the lead agency? _____

* The lead agency is the public agency that has the principal responsibility for approving 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 the county, 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 N/A

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

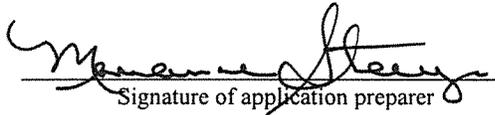
10. PROJECT STATUS

- A. Date of Equipment Installation: N/A
- 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 sheet of paper describing in detail the nature and extend 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

June 29, 2011
Date

Marianne Strange
Print name of application preparer

M. F. Strange & Associates, Inc.
Employer name

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

- Application Filing Fee (Fee = \$341.00. 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/or one of the APCD's *Process/Equipment Summary Forms* (<http://www.sbcapcd.org/eng/dl/dl01.htm>).
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Agent Authorized (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.



Authorized Agent Form - 01A

AUTHORIZED AGENT FORM

I hereby designate Marianne Strange
(agent's name - print)

of M.F. Strange & Associates
(agent's business name - print)

to serve as the Authorized Agent for my company: _____

BreitBurn Energy Company, LP
(applicant or permitted company's name - print)

at Orcutt Hill Stationary Source
(facility name(s) - print)

in dealing with the Santa Barbara County Air Pollution Control District (APCD) in matters regarding (check as appropriate):

- | | |
|---|--|
| <input checked="" type="checkbox"/> Permitting | <input type="checkbox"/> Billing |
| <input checked="" type="checkbox"/> Air Toxics/HRA | <input checked="" type="checkbox"/> Source Testing |
| <input checked="" type="checkbox"/> Inspections and permit compliance | <input type="checkbox"/> All of the above |
| <input type="checkbox"/> Other (state purpose): _____ | |

This Designation includes written correspondence, telephone discussions and meetings and shall remain in effect until it is suspended in writing by my company or the following date: Dec. 31, 2011 whichever is earlier.

As a designated Responsible Official, I hereby authorize the above mentioned agent to represent my company in the matters identified above:

Name (print)	Chris Williamson
Title	Vice President of Operations
Phone	213-225-5900
Address	515 S. Flower Street, Suite 4800
City, State, ZIP	Los Angeles, CA 90071
Signature	

APCD-01A (12/2004)

STATIONARY SOURCE SUMMARY

(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: BreitBurn Energy Company, LP

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Orcutt Hill Stationary Source
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): BreitBurn Energy Company LP
4. Mailing Address of Responsible Official: 515 S. Flower Street, Suite 4800, Los Angeles, CA 90071
5. Street Address of Source Location (include Zip Code): Orcutt Hill Field, 1555 Orcutt Hill Road, Orcutt, CA 93455
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: BreitBurn Energy Company LP
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Chris Williamson Title: Vice President of Operations Telephone #: 213-225-5900
12. Plant Site Manager/Contact: Dick Hart Title: Western Division manager Telephone #: 805-937-2198
13. Type of facility: Oil and gas production
14. General description of processes/products: Oil and gas production from 12 producing leases operating under individual SBC APCD Permits to Operate. This source also includes a gas compression plant and numerous IC engines operated under additional SBC APCD Permits to Operate
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

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: BreitBurn Energy Company, LP	SOURCE NAME: Orcutt Hill Stationary Source

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹	Affected Emission Unit	In compliance? (yes/no/exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²		
<i>Please refer to PTO 8240 Applicable requirements will not change per this permit modification</i>			
1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs. 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection) 3 If exempt from applicable federal requirement, include explanation for exemption. 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.			

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
<i>Please refer to PTO 8240, Applicable requirements will not change per this permit modification</i>			
5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.			

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: BreitBurn Energy Company	SOURCE NAME: Orcutt Hill Stationary Source

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²



Signature of Responsible Official

6-29-11

Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: BreitBurn Energy Company	SOURCE NAME: Orcutt Hill Stationary Source

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

Stationary Source Summary Form
 Total Stationary Source Emission For
 Compliance Plan Form
 Compliance Plan Certification Form
 Exempt Equipment Form
 Certification Statement Form

List other forms or attachments

[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios
 Sample emission calculations
 Fugitive emission estimates
 List of Applicable requirements
 Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
 Facility schematic showing emission points
 NSR Permit
 PSD Permit
 Compliance Assurance monitoring protocols
 Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official *Chris Williamson* Date 6-29-11

Print Name of Responsible Official: Chris Williamson

Title of Responsible Official and Company Name: Vice President of Operations

Avanti Environmental
Component Count Summary
Pivot Table

	Valves	Conn	Flange	Open End& Pump	Comp	Others
Newlove 236 (Abandoned)	0	0	0	0	0	0
Gas	0	0	0	0	0	0
Light Liquid	0	0	0	0	0	0
Newlove 327 (Production Well)	4	0	1	0	0	2
Gas	0	0	0	0	0	0
Light Liquid	4	0	1	0	0	2
Newlove 328 (Production Well)	15	86	2	0	0	6
Gas	6	37	1	0	0	2
Light Liquid	9	49	1	0	0	4
Newlove 329 (Abandoned)	0	0	0	0	0	0
Gas	0	0	0	0	0	0
Light Liquid	0	0	0	0	0	0
Newlove 400 (Horizontal Steam Production Well)	28	158	8	0	0	13
Gas	19	108	7	0	0	9
Light Liquid	9	50	1	0	0	4
Newlove 401 (Horizontal Steam Production Well)	20	96	6	0	0	7
Gas	11	48	5	0	0	3
Light Liquid	9	48	1	0	0	4
Newlove 402 (Horizontal Steam Production Well)	21	114	8	0	0	13
Gas	12	56	7	0	0	9
Light Liquid	9	58	1	0	0	4
Total	88	454	25	0	0	41
	48	249	20	0	0	23
	40	205	5	0	0	18

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION

Attachment: 1 Five Wells
 Company: BreitBurn Energy Company
 Facility: Newlove Lease Orcutt Hill Field
 Processed by: MFSA
 Date:6/29/11

Facility Type: (Choose one)

Production Field	x
Gas Processing Plant	
Refinery	
Offshore Platform	
Component	Count ⁽¹⁾

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	48	0.295	0.31	4.39	0.80	0.04	0.88	0.04	0.16
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	292	0.070	0.31	6.34	0.80	0.05	1.27	0.06	0.23
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		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	340			10.73		0.09	2.15	0.10	0.39
Oil Service									
Valves - Acc/Inacc	40	0.0041	0.56	0.09	0.80	0.00	0.02	0.00	0.00
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	228	0.0020	0.56	0.26	0.80	0.00	0.05	0.00	0.01
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		0.0039	0.56	0.00	0.80	0.00	0.00	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	268			0.347		0.00	0.07	0.00	0.01
Total	608			11.07		0.09	2.21	0.10	0.40

Notes:

- Source:
- APCD P&P # 6100.060.1998.
- APCD P&P # 6100.061.1998
- A 80% efficiency is assigned to fugitive components Rule 331 implementation.

ERCs Required @ 1.2:1 ratio

ERC T/yr 0.485

ERC T/qtr 0.121

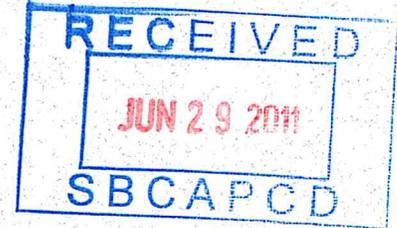


M.F. Strange & Associates, Inc.

Air Quality and Environmental Services

June 29, 2011

Mr. Phil Sheehan
Santa Barbara County
Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315



RE: BreitBurn Energy Company Diatomite Project
PTO Application, 5 New Wells ATC 13230
FID 03321

Dear Mr. Sheehan:

On behalf of BreitBurn Energy Company, enclosed please find an application for Permit to Operate for 5 completed wells that were permitted on ATC 13230. BreitBurn had applied to extend this SCDP date one year until March 21, 2012. This extension was requested to allow BreitBurn to drill five (5) wells budgeted in 2011. In response to the application, the District has requested that a PTO application is submitted for the active wells and the ATC mod would be applied to the remaining 11 wells that are permitted under ATC 13230.

This project requires ERC's, BreitBurn Energy included the original ERC Certificate #0005 for this with the ATC application. Based on the component count and calculated emissions, the total amount of ERCs required for the 5 wells is 0.121 tons per quarter.

Credit card authorization is included for the filing fee of Three Hundred Forty One dollars (\$341.00).

Should you have any questions, do not hesitate to contact me at 805-564-6590.

Sincerely,

Marianne Strange
Authorized Agent

Enclosure

C: Jon Fox, BreitBurn