



Santa Barbara County
Air Pollution Control District

MAR 06 2012

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

FID: 03321
Permit: P 13230
SSID: 02667

Re: Proposed Minor Permit Modification to Pacific Coast Energy Company's Part 70/District PTO 13230 for the Newlove Lease

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 13230 for modifications to Pacific Coast Energy Company's Part 70/District PTO PT-70/Reeval 8240-R7 for the Newlove Lease. 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 April 12, 2012 provided your office has not objected to such issuance during this time interval.

If you have any questions regarding this permit modification, please contact Phil Sheehan of my staff at (805) 961-8876.

Sincerely,

for Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed Pt-70 PTO 13230
Application Form for Minor Modification to Part 70/District PTO 8240-R7.

cc: Pacific Coast Energy Company 3321 Project File NC/SC
ECD Chron File
Craig Strommen (Cover letter only)



Part 70 Minor Modification 13230
and
Permit to Operate 13230

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EQUIPMENT OWNER/OPERATOR:

Pacific Coast Energy Company LP

300000

EQUIPMENT LOCATION:

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

STATIONARY SOURCE/FACILITY:

Pacific Coast 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 is produced from five (5) new Sx Sand Zone wells on the Newlove Lease and piped to existing processing facilities.

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, District 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 District, Rule 505 (Upset/Breakdown rule) and/or District 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 District, 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, District 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: District 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: District 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 District. 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 District 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: District Rule 1304.D.1]*

- A.6 **Payment of Fees.** The permittee shall reimburse the District 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 District and the USEPA pursuant to section 502(a) of the Clean Air Act. *[Re: District 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 District 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 District in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. *[District 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 District 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: District 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 District-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 District upon request. *[Re: District 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 District 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 District 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 District's project file), and with the District's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- A.14 **Indemnity and Separation Clauses.** The Applicant shall defend, indemnify and hold harmless the District or its agents, officers and employees from any claim, action or proceeding against the District or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the approval granted herein. In the event that the District fails promptly to notify the Applicant of any such claim, action or proceeding, or that the District fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no force or effect. In the event that any condition contained herein is determined to be invalid, then all remaining 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 District 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 District Rule 303. *[Re: District 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: District Rule 302]*
- B.3 **Nuisance (Rule 303).** No pollutant emissions from any source at the Pacific Coast Energy Orcutt Stationary Source shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. *[Re: District 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: District 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: District 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: District 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: District 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: District 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 District 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: District 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: District 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. In case of a discrepancy between the wording of a condition and the applicable federal or District rule(s), the wording of the rule shall control.

- C.1 **Emission Limitations.** The mass emissions from the equipment permitted herein shall not exceed the values listed in Table 1. Compliance shall be based on the operational, recordkeeping and reporting conditions of this permit.
- C.2 **Operational Restrictions.** The permitted equipment is subject to the following operational restrictions:
- a. *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.3 **Monitoring.** 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.
- C.4 **Recordkeeping.** The following records shall be maintained by the operator and shall be made available to the District upon request.
- a. 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.
- C.5 **Reporting.** Twice a year, the operator shall submit a compliance verification report to the District. Each report shall document compliance with all permit conditions, rules or other statutory requirements during the prior two calendar quarters. The report shall be submitted by March 1st and September 1st each year. The report shall contain information necessary to verify compliance with the emission limits and other requirements of this permit and shall document compliance separately for each calendar quarter. The report shall be in a format approved by the District. All logs and other basic source data not included in the report shall be made available to the District upon request. The report shall include the following information:
- a. 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.

C.6 **Offsets.** Pacific Coast Energy shall offset all reactive organic compound (ROC) emissions pursuant to Table 2 of this permit. Emission reduction credits (ERCs) sufficient to offset the permitted quarterly ROC emissions shall be in place for the life of the project.

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

MAR 06 2012

DATE

Attachments:

- Table 1 - Permitted Emission Limits
- Table 2 - Offsets and Emission Reduction Credit Requirements
- Permit Equipment List
- Permit Evaluation for Permit to Operate 13230

Notes:

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

**Table 1
Total Permitted Emissions**

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	--	--	--	--	--
Pits and Sumps	--	--	--	--	--	--
Fugitive Components	--	0.09	--	--	--	--
	0.00	0.09	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	--	2.22	--	--	--	--
	0.00	2.22	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	--	0.10	--	--	--	--
	0.00	0.10	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	--	0.41	--	--	--	--
	0.00	0.41	0.00	0.00	0.00	0.00

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**Table 1
BreitBurn Orcutt Emissions and ERCs Used**

REACTIVE ORGANIC COMPOUNDS (ROC) NEI FROM PROJECT	ROC		ERC		
	TPQ	TPY	Certificate		
Cal Coast 750 Bbl Wash Tank (P10833)	0.018	0.070	172, 215 (a)(b)		
Cal Coast Replace 2000 bbl Crude Tank (P10934)	0.030	0.120	172, 215 (a)(b)		
Cal Coast 750 Bbl Wastewater Tank (P11191)	0.035	0.140	172, 215 (a)(b)		
Cal Coast Increase Wash Tank From 2,000 Bbl to 3,000 Bbl	0.000	0.000			
Cal Coast Loading Rack & Throughput Increase (A13514) (e)	0.065	0.129	172, 215 (a)(b)		
Hartnell New H2S Scrubber at K7 (A13408)	0.058	0.230	172, 215 (a)(b)		
Newlove Replace 10,000 Bbl Wastewater Tank (P11909)	0.000	0.000			
Newlove Replace 3,000 Bbl Wastewater Tank (A12273)	0.000	0.000			
Newlove Replace 3,000 Bbl Wastewater Tank (P12354)	0.000	0.000			
Newlove Diatomite Project (A12084-03)	1.323	5.290	172, 215 (a)(b)		
Newlove Thermal Oxidizer (A13000)	0.040	0.160	172, 215 (a)(b)		
Newlove Throughput Increase (A13134)	0.043	0.170	172, 215 (a)(b)		
Newlove Twenty-nine New Sx Sand Wells (A13140)	0.560	2.240	172, 215 (a)(b)		
Newlove Four New Wells (A13141)	0.010	0.040	172, 215 (a)(b)		
Newlove Five Sx Wells (P13230) (f)	0.101	0.405	172, 215 (a)(b)		
Newlove Vacuum Truck Washout Station (ATC 13368)	0.222	0.889	249 (a)(b)		
Newlove New Sulfur Scrubber (A13397)	0.045	0.180	172, 215 (a)(b)		
Newlove Loading Rack (A13513) (e)	0.095	0.095	172, 215 (a)(b)		
Pinal Replace 3,000 Bbl Wash Tank (P10752)	0.003	0.010	172, 215 (a)(b)		
Pinal Replace 1,000 Bbl Wastewater Tank (P11982)	0.000	0.000			
Pinal Replace 5,000 Bbl Wastewater Tank (P13145)	0.000	0.000			
Pinal Loading Rack & Throughput Increase (A13539) (e)	0.023	0.023	172, 215 (a)(b)		
Squires Convert Liquid Knockout to a Sulfur Scrubber (A13296)	0.040	0.160	172, 215 (a)(b)		
Compressor Plant Convert Inlet Scrubber to Sulfur Scrubber (P11580)	0.023	0.090	172, 215 (a)(b)		
Compressor Plant Convert Inlet Scrubber to a Sulfur Scrubber (A12032)	0.003	0.010	172, 215 (a)(b)		
Compressor Plant New VRU & Component Update (A12767)	0.275	1.100	172, 215 (a)(b)		
Compressor Plant Replaced Road Oil Tank with a Wastewater Tank (A13161)	0.028	0.110	172, 215 (a)(b)		
I.C. Engines (P8039-R6) NEI From Previous Permits	0.003	0.010	172, 215 (a)(b)		
I.C. Engines New 80 bhp Backup Generator for the Field Office (A13592) (e)	0.001	0.001	237 (a)(b)		
Steam Generator Modifications (A11405-01, A11405-02, & ATC/PTO 11405)	0.193	0.770	172, 215 (a)(b)		
Orcutt MVFF (P11166)	0.010	0.040	172, 215 (a)(b)		
	3.242	12.482			
EMISSION REDUCTION SOURCES					
	Emission Reduction Credits Used		Distance Factor	Emission Liability	
	TPQ	TPY		TPQ	TPY
ROC ERCs	0.655	2.620	1.2	0.546	2.183
NOx ERCs	3.235	12.941	1.2	2.696	10.299
TOTAL	3.890	15.560		3.242	12.482

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) TPQ is not equal to TPY/4 per ATC applications 13513, 13514, 13539, & 13592
- (f) This value also corrects an error in the ATC 13230 offset table.
In the ATC 13230 offset table only the emissions from components in gas service were offset.
The emissions from the components in oil service and in gas service should have been offset.

PERMIT EQUIPMENT LIST - TABLE A

PTO 13230 / FID: 03321 Newlove Lease / SSID: 02667

A PERMITTED EQUIPMENT

1 Oil & Gas Wells

<i>Device ID #</i>	112825	<i>Device Name</i>	Oil & Gas Wells
<i>Rated Heat Input</i>		<i>Physical Size</i>	5.00 Active Wells
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	Five oil & gas wells, numbers 327, 328, 400, 401, and 402. Wells not equipped with cellars.		

2 Fugitive Hydrocarbon Components

2.1 Valves - Gas Service

<i>Device ID #</i>	112820	<i>Device Name</i>	Valves - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	48.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	48 clps		

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2.2 Connections/Flanges - Gas Service

<i>Device ID #</i>	112821	<i>Device Name</i>	Connections/Flanges - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	292.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	292 clps		

2.3 Valves - Oil Service

<i>Device ID #</i>	112822	<i>Device Name</i>	Valves - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	40.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	40 clps		

2.4 Flanges/Connections - Oil Service

<i>Device ID #</i>	112823	<i>Device Name</i>	Flanges/Connections - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	228.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	228 clps		

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2.5 Pump Seals - Oil Service

<i>Device ID #</i>	112824	<i>Device Name</i>	Pump Seals - Oil Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	5.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Newlove Lease		
<i>Device Description</i>	5 clps		

**Table 5.1-1
BreitBurn Newlove Lease: Permit to Operate 13230
Operating Equipment Description**

Equipment Category	Description	Dev No	Device Specifications				Usage Data				Maximum Operating Schedule				References
			Feed	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr	year		
			TVF												
Tanks	Wash Tank	002973	OW	2.420	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 bbl/day	1.0	1.0	24	2,190	8,760	A			
	Wash Tank	002979	OW	2.420	3,000 bbls	3,000 bbl/day	1.0	1.0	24	2,190	8,760	A			
	Crude Tank	002974	Oil	2.420	1,000 bbls	3,000 bbl/day	1.0	1.0	24	2,190	8,760	A			
	Wastewater Tank	110332	Water	2.420	1,000 bbls	-	1.0	1.0	24	2,190	8,760	B			
	Wastewater Tank	107475	Water	2.420	10,000 bbls	-	1.0	1.0	24	2,190	8,760	B			
	Pits and Sumps	Well Cellars	003041	OW	Primary	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			
Vacuum Truck Washout #1		113871	OW	Tertiary	420 ft ²	-	1.0	1.0	24	2,190	8,760	B			
Vacuum Truck Washout #2		113872	OW	Tertiary	420 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	299 clps	-	1.0	1.0	24	2,190	8,760					
	Flanges/Connections	-	Gas	1,962 clps	-	1.0	1.0	24	2,190	8,760					
	Pressure Safety Valves	-	Gas	0 clps	-	1.0	1.0	24	2,190	8,760					
	Valves	-	Oil	285 clps	-	1.0	1.0	24	2,190	8,760					
	Flanges/Connections	-	Oil	1,652 clps	-	1.0	1.0	24	2,190	8,760					
	Pump Seals	-	Oil	31 clps	-	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 13230
Equipment Emission Factors**

Equipment Category	Description	Dev No	Emission Factors							Units
			NO _x	ROC	CO	SO _x	PM	PM ₁₀		
Tanks	Wash Tank	002973	--	--	--	--	--	--	--	lb/ft ² -day
	Wash Tank	109949	--	--	--	--	--	--	--	lb/ft ² -day
	Wash Tank	002979	--	--	--	--	--	--	--	lb/ft ² -day
	Crude Tank	002974	--	--	--	--	--	--	--	lb/ft ² -day
	Wastewater Tank	110332	--	0.0006	--	--	--	--	--	lb/ft ² -day
	Wastewater Tank	107475	--	0.0006	--	--	--	--	--	lb/ft ² -day
Pits and Sumps	Well Cellars	003041	--	0.0282	--	--	--	--	--	lb/ft ² -day
	Pits	Note A	--	0.0126	--	--	--	--	--	lb/ft ² -day
	Spill Catch Pan	101177	--	0.0941	--	--	--	--	--	lb/ft ² -day
	Vacuum Truck Washout #1	113871	--	0.0058	--	--	--	--	--	lb/ft ² -day
	Vacuum Truck Washout #2	113872	--	0.0058	--	--	--	--	--	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 Newlove Lease: Permit to Operate 13230
 Hourly and Daily Emissions

Equipment Category	Description	Dev No	NOx		SOx		CO		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	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.04	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	109849	--	--	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	--	--	--	--	--	--	A	--
	Vacuum Truck Washout #1	113871	--	--	0.10	2.44	--	--	--	--	--	--	FE	ATC 13368
	Vacuum Truck Washout #2	113872	--	--	0.10	2.44	--	--	--	--	--	--	FE	ATC 13368
Fugitive Components	Valves, Connections, etc	002980	--	--	2.17	52.19	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.04	1.01	--	--	--	--	--	--	A	--
Fugitive Components	Valves		--	--	0.23	5.47	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.35	8.52	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.00	0.00	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.01	0.13	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.02	0.37	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.01	--	--	--	--	--	--	FE	ATC 13140

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

Table 5.1-4
 BreitBurn Newlove Lease: Permit to Operate 13230
 Quarterly and Annual Emissions

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability Basis	
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	109949	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wash Tank	002979	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 13134
	Crude Tank	002974	--	--	0.05	0.20	--	--	--	--	--	--	--	--	FE	ATC 13134
	Wastewater Tank	110332	--	--	0.01	0.04	--	--	--	--	--	--	--	--	FE	ATC 12354
	Wastewater Tank	107475	--	--	0.07	0.27	--	--	--	--	--	--	--	--	FE	ATC 11909
Pits and Sumps	Well Cellars	003041	--	--	1.34	5.38	--	--	--	--	--	--	--	--	A	--
	Pits	Note A	--	--	0.04	0.17	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.09	--	--	--	--	--	--	--	--	A	--
	Vacuum Truck Washout #1	113871	--	--	0.11	0.44	--	--	--	--	--	--	--	--	FE	ATC 13368
	Vacuum Truck Washout #2	113872	--	--	0.11	0.44	--	--	--	--	--	--	--	--	FE	ATC 13368
															FE	ATC 13368
Fugitive Components	Valves, Connections, etc	002980	--	--	2.38	9.52	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.05	0.18	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves		--	--	0.25	1.00	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.39	1.55	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pressure Safety Valves		--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE	ATC 13140
	Valves		--	--	0.01	0.02	--	--	--	--	--	--	--	--	FE	ATC 13140
	Flanges/Connections		--	--	0.02	0.07	--	--	--	--	--	--	--	--	FE	ATC 13140
	Pump Seals		--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE	ATC 13140

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

Table 5.2
BreitBurn Newlove Lease: Permit to Operate 13230
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	--	1.49	--	--	--	--
Fugitive Components	--	2.82	--	--	--	--
	0.00	4.44	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	--	35.79	--	--	--	--
Fugitive Components	--	67.70	--	--	--	--
	0.00	106.45	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	--	1.63	--	--	--	--
Fugitive Components	--	3.09	--	--	--	--
	0.00	4.86	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	--	6.53	--	--	--	--
Fugitive Components	--	12.35	--	--	--	--
	0.00	19.43	0.00	0.00	0.00	0.00

Table 5.3
BreitBurn Newlove Lease: Permit to Operate 13230
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	--	1.49	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.60	--	--	--	--
	0.00	2.23	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	--	35.79	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	14.50	--	--	--	--
	0.00	53.26	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	--	1.63	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	0.66	--	--	--	--
	0.00	2.44	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	--	6.53	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
Fugitive Hydrocarbons	--	2.65	--	--	--	--
	0.00	9.73	0.00	0.00	0.00	0.00



PERMIT EVALUATION FOR
Part 70 Minor Modification 13230 / Permit to Operate 13230

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1.0 BACKGROUND

- 1.1 General: Authority to Construct 13230 was issued December 29, 2009 for the installation of eighteen wells at the Newlove Lease. Seven wells were drilled: wells 327 and 328 are active, wells 400, 401 and 402 are idle and wells 236 and 329 have been plugged and abandoned. Breitburn submitted PTO application 13230 on June 29, 2011 for the two active and the three idle wells. This application was deemed complete on July 29, 2011. ATC 13845 will be issued for seven wells originally included in ATC 13230 but never drilled. After the application for PTO 13230 was received, the name of the owner/operator for this facility was changed from BreitBurn Energy Company LP to Pacific Coast Energy Company LP.
- 1.2 Permit History: A detailed permitting history for the Newlove Lease facility can be found in PTO 8240-R7.
- 1.3 Compliance History: The compliance history of the Newlove Lease can be found in PTO 8240-R7.

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: The equipment subject to this permit includes five oil and gas wells, and the associated valves, flanges, pump seals, and fittings which emit fugitive hydrocarbon emissions. The wells are not equipped with well cellars. Production flow lines and casinghead gas lines are tied into a well header system.
- 2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with District Rule 331. An 80-percent reduction is applied to valves, flanges, pump seals, and fittings, for implementation of Rule 331.
- 2.3 Emission Factors: Emission factors are documented in the attached emission calculation worksheet.
- 2.4 Reasonable Worst Case Emission Scenario: The operating scenario is summarized as follows:
- Permitted equipment operates 24 hrs/day, 365 days/yr.
 - An 80% ROC emission reduction is applied to valves, connections, and fittings for implementation of Rule 331.
- 2.5 Emission Calculations: A detailed emission calculation spreadsheet may be found in Attachment A. These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13230 / PERMIT TO OPERATE 13230

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- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions to ensure compliance with District rules and regulations.
- 2.9 Monitoring Requirements: The only monitoring requirement of this permit is the monitoring of fugitive hydrocarbon emissions.
- 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 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 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
- Rule 810. Federal Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: N/A

- 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 emissions associated with this project constitute NEI.

5.0 AQIA

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

6.0 OFFSETS/ERCs

- 6.1 Offsets: The emissions from ATC 13230 caused the cumulative Net Emissions Increase for the Pacific Coast Energy Orcutt Hill Stationary Source to exceed the 55 lbs/day offset threshold. Thus, all NEI emissions associated with the stationary source were offset when ATC 13230 was issued. Since only five of the original eighteen permitted wells were drilled, the emissions associated with the thirteen wells that were not drilled are credited as a P2 term in the Newlove Lease NEI Table.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 13230 / PERMIT TO OPERATE 13230

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Any wells drilled in the future under separate ATCs will be offset when those ATCs are issued. Also, an error in the ATC 13230 offset table has been corrected. In the ATC 13230 offset table only the emissions from components in gas service were offset. The emissions from the components in oil service and in gas service should have also been offset.

6.2 ERCs: Pacific Coast Energy has utilized Emission Reduction Credits to offset the emissions from this project. These are also detailed in Table 2 of the permit.

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). Appendix A.2 (*Equipment or Operations Exempt from CEQA*) specifically exempts permits to operate. No further action is necessary.

9.0 SCHOOL NOTIFICATION

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

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS

This project was not subject to public notice. In a February 21, 2012 email, Ms. Marianne Strange wrote that Pacific Coast Energy had no comments on the draft version of this permit.

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.

Phil Sheehan AQ Engineer		02/22/12 Date		3/5/12 Date
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13.0 ATTACHMENTS

- A. Figures & Table
- B. Fee Statement

Attachment "A"
Emission Calculations

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION	
Attachment: A	
Company: BreitBurn	
Facility: Newlove Lease	
Processed by: PES	
Date: 01/04/12	
Path & File Name:	

Facility Type: (Choose one)	
Production Field	x
Gas Processing Plant	
Refinery	
Offshore Platform	

Component	Count ⁽¹⁾	ROC ⁽²⁾ Emission Factor (lbs/day-clip)	ROC/THC Ratio	Uncontrolled		Controlled		Controlled				
				ROC Emission (lbs/day)	ROC Control Eff	ROC Emission (lbs/hr)	ROC Emission (lbs/day)	ROC Emission (Tons/Qtr)	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			

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	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			7.55	1.38								
A13397	06/16/10			0.99	0.18								
A13513	11/4/2010			4.87	0.10								
A13368	11/10/2011			0.22	0.89								
Totals		100.07	16.72	117.13	18.28	187.07	30.24	31.66	5.44	69.05	10.51	69.05	10.51

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
P13230				5.24	0.97								
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
Totals		62.65	9.90	58.45	8.49	118.86	17.79	19.58	3.23	45.00	6.11	45.00	6.11

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	100.07	16.72	117.13	18.28	187.07	30.24	31.66	5.44	69.05	10.51	69.05	10.51
P2	62.65	9.90	58.45	8.49	118.86	17.79	19.58	3.23	45.00	6.11	45.00	6.11
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	56.91	9.47	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	56.91	9.47	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	0.06	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	95.28	12.48	87.97	14.57	14.70	2.59	27.42	5.01	27.42	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.

FEE STATEMENT

PTO No. 13230

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 per Unit	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112825	Oil & Gas Wells	A1.a	1.000	61.57	Per equipment	No	5	1.000	307.85	0.00	0.00	307.85
112820	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 =									\$369.42			
Device Fee Total =									\$369.42		\$0.00	\$369.42

Permit Fee

Fee Based on Devices

369.42

Fee Statement Grand Total = \$369

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.