

September 22, 2009

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

Re: Permit to Operate (PTO) Modification Application for Platform Holly, Part 70  
Operating Permit and PTO No. 8234-R7 to Include New Permit Language for the  
Generators and Modify the Permitted Equipment List

Project No. TBD

Dear Mr. Ellenberger:

This PTO Modification Application is being submitted to: (1) modify Permit Condition No. 9.C.1.(b).(i) to include permit language that allows adjustment of the oxygen sensor signal range based on NOx/CO monitoring results; and modify Permit Condition No. 9.C.1.(d).(ii) to record fuel use on a monthly basis vs. daily; and (2) modify Permitted Equipment List (Attachment 10.5), Item No. 19.3, Operator ID No. from V-105 to V-106. V-105 was removed and replaced with V-106.

Enclosed in this application package is Form APCD-01, Part 70 Form 1302-A1, Part 70 Form 1302-A2, and Part 70 Form 1302-M. In addition the revised P&IDs associated with the change from V-105 to V-106 are included with this package as well.

Please bill Venoco for the Rule 210 application fee.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'Laura Kranzler'.

Laura Kranzler  
Northern Assets Environmental Coordinator

Attachments: Permit Application Forms APCD-01

Permit Application Forms 1302-A1, A2, B, and M  
P&IDs F11231-4,5,6, and 7A

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



# General Permit Application Form -01

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

### 1. APPLICATION TYPE (check all that apply):

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

Previous ATC/PTO Number (if known) | PTO No. 8234-R7

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

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

### 2. FILING FEE:

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

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

If yes, provide the name of school(s) | \_\_\_\_\_

Address of school(s) | \_\_\_\_\_

City | \_\_\_\_\_ Zip Code | \_\_\_\_\_

**4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION?**  Yes  No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): [http://www.sbcapcd.org/eng/dl/eng\\_p-and-p/6100-020.pdf](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	3105	Permit No.	<div style="border: 2px solid black; padding: 5px; text-align: center;"> <p>RECEIVED</p> <p>SEP 22 2009</p> <p>SBCAPCD</p> </div>
Project Name	Platform Holly		
Filing Fee	335.	202 E? YES / NO	

No Money - Deduct filing fee from reimbursement account

**5. COMPANY/CONTACT INFORMATION:**

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

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

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

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

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

**6. GENERAL NATURE OF BUSINESS OR AGENCY:**

Oil and Gas Production

**7. EQUIPMENT LOCATION (Address):**

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

Equipment Address

City  State  Zip Code

Work Site Phone

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

Assessors Parcel No(s):

**8. PROJECT DESCRIPTION:**

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

1. Modify Permit Condition No. 9.C.1.(b).(i) to include permit language that allows adjustment of the oxygen sensor signal range based on NOx/CO monitoring results; and modify Permit Condition No. 9.C.1.(d).(ii) to record fuel use on a monthly basis vs. daily.  
 2. Modify Permitted Equipment List (Attachment 10.5), Item No. 19.3, Operator ID No. from V-105 to V-106. V-105 was removed and replaced with V-106.

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

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

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

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

- Yes  No

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

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

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

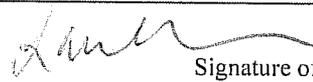
**10. PROJECT STATUS:**

- A. Date of Equipment Installation As soon as approved
  
- B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit  Yes  No 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.
  
- C. Is this application being submitted due to the loss of a Rule 202 exemption?  Yes  No
  
- D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions.  Yes  No
  
- E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T.  Yes  No

**11. APPLICANT/PREPARER STATEMENT:**

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

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

 Signature of application preparer	<span style="border: 1px solid black; padding: 2px;">Sep 11, 2009</span> Date
Laura Kranzler Print name of application preparer	Venoco, Inc. Employer name

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

- Application Filing Fee (Fee = \$335. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
  
- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01t.pdf>
  
- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf>
  
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.sbcapcd.org/eng/dl/dl01.htm>) that apply to the project.
  
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>
  
- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

**13. NOTICE OF CERTIFICATION:**

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

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NOTICE of CERTIFICATION

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

Venoco, Inc.  
Type or Print Name of Business, Corporation, Company, Individual, or Agency

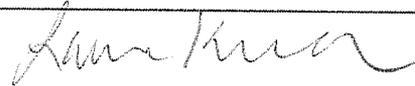
(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when 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: Laura Kranzler Title: Northern Assets Environmental Coordinator

Date: Sep 11, 2009 Phone: 805-745-2270

Signature of Authorized Company Representative



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

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# STATIONARY SOURCE SUMMARY

## (Form 1302-A1)

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APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: Venoco Inc.

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### ➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee\*:

Date Application Deemed Complete:

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#### I. SOURCE IDENTIFICATION

1. Source Name: Venoco – Platform Holly
2. Four digit SIC Code: 1310 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): Venoco Inc.
4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Suite 100, Carpinteria, CA 93013
5. Street Address of Source Location (include Zip Code): Parcel 3242-1, South Ellwood Field, SB County, CA
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line  Yes  No  
50 miles of a Native American Nation  Yes  No  Not Applicable
8. Type of Organization:  Corporation  Sole Ownership  Government  
 Partnership  Utility Company
9. Legal Owner's Name: Venoco Inc.
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Ed O'Donnell Title: Senior Vice President Telephone #: 805-745-2100
12. Plant Site Manager/Contact: Jeff MacDonald Title: Senior Operations Supervisor Telephone #: 805-961-2301
13. Type of facility: Oil and Gas Platform
14. General description of processes/products: Crude Oil and Natural Gas Production
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)?  Yes  No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required?  Not Applicable  Yes  No  
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

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

# STATIONARY SOURCE SUMMARY

## (Form 1302-A2)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> Venoco Inc.	<b>SOURCE NAME:</b> Platform Holly

### II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input type="checkbox"/> Permit Renewal		
<input type="checkbox"/> Significant Permit Revision*		
<input checked="" type="checkbox"/> Minor Permit Revision*	PTO No. 8234-R7	December 2011
<input type="checkbox"/> Administrative Amendment		

### III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- a:     Portable Source             Voluntary Emissions Caps  
           Acid Rain Source             Alternative Operating Scenarios  
           Source Subject to MACT Requirements [Section 112]
- b:     None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule?     Yes     No

3. For permit modifications, provide a general description of the proposed permit modification:

In PTO No. 8234-R7:

1. Modify Permit Condition No. 9.C.1.(b).(i) to include permit language that allows adjustment of the oxygen sensor signal range based on NO<sub>x</sub>/CO monitoring results; and modify Permit Condition No. 9.C.1.(d).(ii) to record fuel use on a monthly basis vs. daily.
2. Modify Permitted Equipment List (Attachment 10.5), Item No. 19.3, Operator ID No. from V-105 to V-106. V-105 was removed and replaced with V-106.

\*Requires APCD-approved NSR permit prior to a permit revision submittal

# CERTIFICATION STATEMENT (Form 1302-M)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < <b>APCD IDS PROCESSING ID:</b>
<b>COMPANY NAME:</b> Venoco Inc.	<b>SOURCE NAME:</b> Platform Holly

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 blankspace 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 Form  
 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

Date

Print Name of Responsible Official: Ed O'Donnell \_\_\_\_\_

Title of Responsible Official and Company Name: Senior Vice President, Venoco, Inc. \_\_\_\_\_

**CERTIFICATION STATEMENT**  
**(Form 1302-M continued)**

<b>APCD:</b> Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ <b>APCD IDS PROCESSING ID:</b>
<b>COMPANY NAME:</b> Venoco Inc.	<b>SOURCE NAME:</b> Platform Holly

**List Other Forms or Attachments (cont.)**

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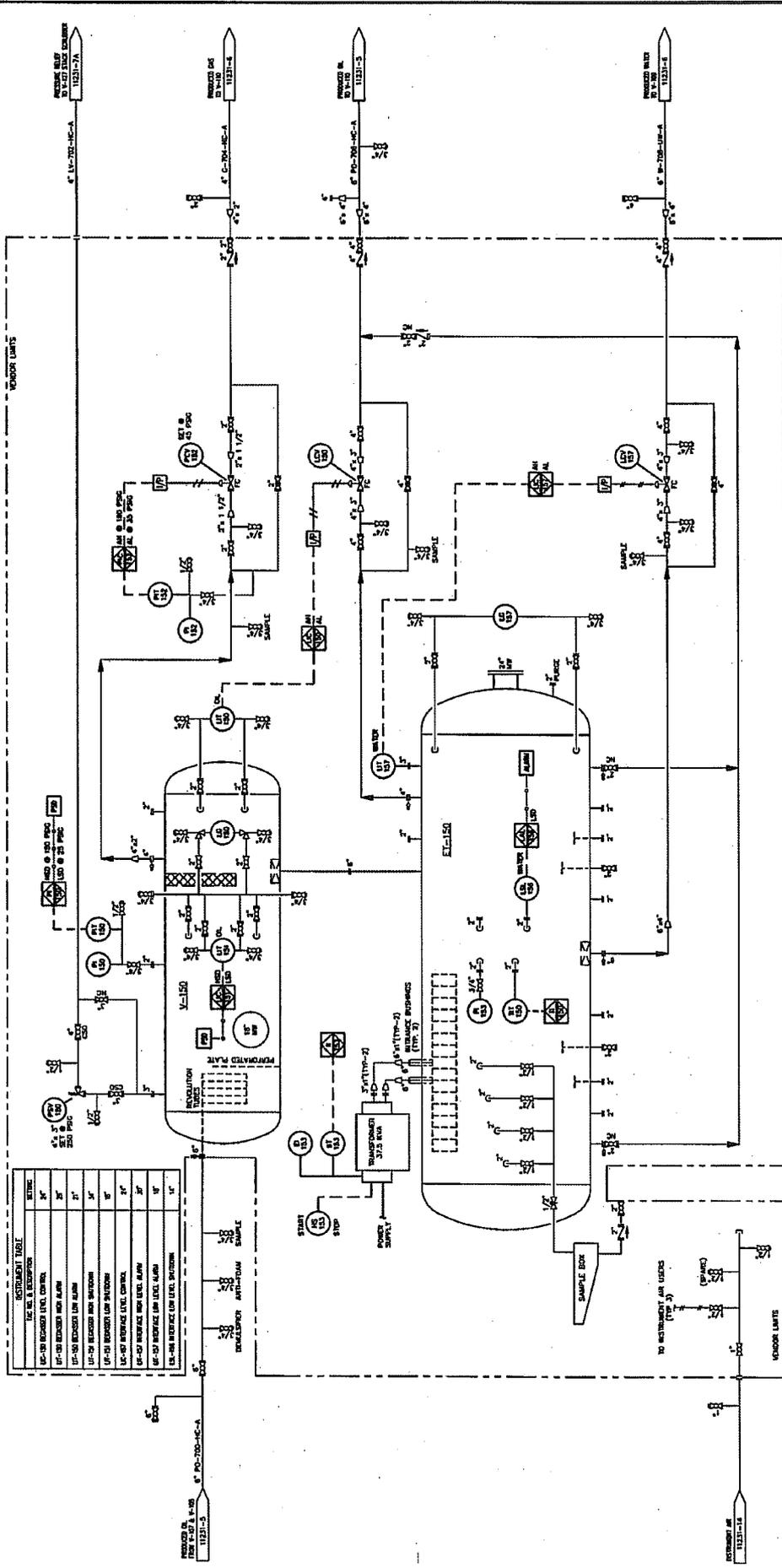
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FT-150  
ELECTROSTATIC TREATER  
M.A.P. 250 P.S.I. @ 200°

V-150  
TOP MOUNTED DE-GASSER  
M.A.P. 250 P.S.I. @ 200°



REVISION	DATE	DESCRIPTION
1	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
2	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
3	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
4	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
5	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
6	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
7	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
8	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
9	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
10	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM

NO.	DESCRIPTION	QTY.	UNIT
1	1/2" SCH. 40 STEEL PIPE	10	FT.
2	1/2" SCH. 40 STEEL PIPE	10	FT.
3	1/2" SCH. 40 STEEL PIPE	10	FT.
4	1/2" SCH. 40 STEEL PIPE	10	FT.
5	1/2" SCH. 40 STEEL PIPE	10	FT.
6	1/2" SCH. 40 STEEL PIPE	10	FT.
7	1/2" SCH. 40 STEEL PIPE	10	FT.
8	1/2" SCH. 40 STEEL PIPE	10	FT.
9	1/2" SCH. 40 STEEL PIPE	10	FT.
10	1/2" SCH. 40 STEEL PIPE	10	FT.

NO.	DESCRIPTION	QTY.	UNIT
1	1/2" SCH. 40 STEEL PIPE	10	FT.
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5	1/2" SCH. 40 STEEL PIPE	10	FT.
6	1/2" SCH. 40 STEEL PIPE	10	FT.
7	1/2" SCH. 40 STEEL PIPE	10	FT.
8	1/2" SCH. 40 STEEL PIPE	10	FT.
9	1/2" SCH. 40 STEEL PIPE	10	FT.
10	1/2" SCH. 40 STEEL PIPE	10	FT.

NO.	DESCRIPTION	QTY.	UNIT
1	1/2" SCH. 40 STEEL PIPE	10	FT.
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7	1/2" SCH. 40 STEEL PIPE	10	FT.
8	1/2" SCH. 40 STEEL PIPE	10	FT.
9	1/2" SCH. 40 STEEL PIPE	10	FT.
10	1/2" SCH. 40 STEEL PIPE	10	FT.

NO.	DESCRIPTION	QTY.	UNIT
1	1/2" SCH. 40 STEEL PIPE	10	FT.
2	1/2" SCH. 40 STEEL PIPE	10	FT.
3	1/2" SCH. 40 STEEL PIPE	10	FT.
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7	1/2" SCH. 40 STEEL PIPE	10	FT.
8	1/2" SCH. 40 STEEL PIPE	10	FT.
9	1/2" SCH. 40 STEEL PIPE	10	FT.
10	1/2" SCH. 40 STEEL PIPE	10	FT.

MECHANICAL FLOW DIAGRAM  
**ELECTROSTATIC TREATER**  
PLATFORM HOLLY OFFSHORE, SANTA BARBARA, CA

VENOCO INC.  
CORPORATION  
20000 SANTA BARBARA AVENUE  
SANTA BARBARA, CA 93110  
TEL: 805/965-1000 FAX: 805/965-1001

REVISIONS

NO.	DATE	DESCRIPTION
1	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
2	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
3	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
4	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
5	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
6	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
7	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
8	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
9	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM
10	12/13/07	AS-BUILT, 8 REVISIONS FROM PLATFORM

ENGINEERING RECORD

DATE	BY	DESCRIPTION
04/27/09	T. SAGON	REVISION 10

PROJECT: PLATFORM HOLLY OFFSHORE, SANTA BARBARA, CA  
 PROJECT NO.: F-11231-4  
 DRAWING NO.: 5-13-08  
 SCALE: NONE  
 DATE: 04/27/09  
 DRAWN BY: T. SAGON  
 CHECKED BY: T. SAGON  
 APPROVED BY: T. SAGON





