



MAR 11 2015

Mr. Johnathan Le Van
Aera Energy, LLC
PO Box 11164
Bakersfield, CA 93389-1164

Re: Notice of Minor Title V Permit Modification
District Facility # S-1548
Project # S-1144267

Dear Mr. Le Van:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-1548-423-8 (under project S-1144047) into the Title V operating permit. The modification authorized an addition of 200 steam-enhanced oil recovery wells to the 1170 steam-enhanced wells permitted on PTO S-1548-423.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1548-423-8, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.healthyliving.com

TITLE V APPLICATION REVIEW

Minor Modification

Project #: S1548, 1144267

Engineer: Steve Davidson

Date: March 5, 2015

Facility Number: S-1548
Facility Name: Area Energy, LLC
Mailing Address: PO Box 11164
Bakersfield, CA 93389-1164

Reviewed by ASURRAQE

MAR 05 2015

Contact Name: Jonathan Le Van
Phone: (661) 665-4403

Responsible Official: T.A. Bivens
Title: Process Supervisor

I. PROPOSAL

Area Energy, LLC is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) #S-1548-423-8 into Area Energy's Title V permit. This ATC authorized an addition of 200 steam-enhanced oil recovery wells to the 1170 steam-enhanced wells permitted on PTO S-1548-423 at Area's Light Oil Western Stationary Source. Post-project the total number of wells will be 1370.

Conditions will be placed on the permit to ensure the units make the requirements of this category.

II. FACILITY LOCATION

The equipment is located in the Belridge oil field, within Area's Light Oil Western stationary source.

III. EQUIPMENT DESCRIPTION

S-1548-423-9: 1,370 THERMALLY ENHANCED PRODUCTION WELLS WITH CLOSED CASING VENTS

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Authority to Construct (ATC) permit authorized an addition of 200 steam-enhanced oil recovery wells to the 1170 steam-enhanced wells permitted on PTO S-1548-423 at Aera's Light Oil Western Stationary Source. Post-project the total number of wells will be 1370.

Condition # on PTO S-1548-423-6	Condition # on Propose PTO S-1548-423-9	Condition is New, Modified, or Removed	Reason for Change from Current PTO
9	9	Modified	Total Daily emissions limit raised from 516.0 lb-VOC per day to 517.7 lb-VOC per day

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

Because these permit revisions meet all the above criteria, this is a Minor Modification.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit #
S-1548-423-9

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-423-9

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

1,370 THERMALLY ENHANCED PRODUCTION WELLS WITH CLOSED CASING VENTS

DRAFT

PERMIT UNIT REQUIREMENTS

1. Well casing valves shall remain closed or connected to production lines at all times except during periods of actual service or repair as defined in Rule 4401. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
2. All produced fluids from any thermally enhanced production well associated with this operation shall be handled only in closed production equipment prior to introduction to the Section 20 dehydration facility (principally, S-1548-144 through -149 including associated equipment, i.e., Wemco, ISF units, drain tanks, etc.) [District Rule 2201] Federally Enforceable Through Title V Permit
3. Thermally enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Any thermally enhanced production well producing crude oil with an API gravity greater than 30 and a true vapor pressure greater than 1.5 psia (determined using the methods specified in Rule 4409) shall comply with all applicable Rule 4409 requirements. [District Rule 4409] Federally Enforceable Through Title V Permit
5. Total number of leaks from the vapor collection and control system, including condensate handling shall not exceed the number allowed by Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
6. All components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.), pump seals, valves with visible actuators, polish rod stuffing boxes and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Component screening shall be performed in accordance with EPA reference Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Portable hydrocarbon detection instrument shall be operated and calibrated in accordance with recommendations in CAPCOA/CARB's California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities (February, 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fugitive VOC emission rate from all components associated with this steam enhanced well operation shall not exceed 517.7 b/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive VOC emission rate listed above does not include the fugitive emissions from the well test pressure vessels and piping at the LOTS sites. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall maintain a current list of all thermally enhanced production wells associated with this operation; shall update the list whenever a well is added, replaced, or deleted; and such listing shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

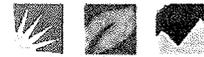
12. Permittee shall maintain for a period of five years, accurate records of fugitive inspection component counts, leak screening values in excess of 10,000 ppm, and shall, as approved by the District, calculate fugitive emissions using February 1999 CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c. Permittee shall make records of component counts, screening values, and calculations readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

Authority to Construct #
S-1548-423-8



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1548-423-8

ISSUANCE DATE: 11/10/2014

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1,170 THERMALLY ENHANCED PRODUCTION WELLS WITH CLOSED CASING VENTS: ADD 200 THERMALLY ENHANCED PRODUCTION WELLS

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 202 lb, 2nd quarter - 202 lb, 3rd quarter - 202 lb, and fourth quarter - 202 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
3. ERC Certificate Number S-4282-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well casing valves shall remain closed or connected to production lines at all times except during periods of actual service or repair as defined in Rule 4401. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
5. All produced fluids from any thermally enhanced production well associated with this operation shall be handled only in closed production equipment prior to introduction to the Section 20 dehydration facility (principally, S-1548-144 through '-149 including associated equipment, i.e., Wemco, ISF units, drain tanks, etc.) [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
S-1548-423-8 Nov 10 2014 1:54PM -- DAVIDSOS Job Inspection NOT Required

6. Thermally enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Any thermally enhanced production well producing crude oil with an API gravity greater than 30 and a true vapor pressure greater than 1.5 psia (determined using the methods specified in Rule 4409) shall comply with all applicable Rule 4409 requirements. [District Rule 4409] Federally Enforceable Through Title V Permit
8. Total number of leaks from the vapor collection and control system, including condensate handling shall not exceed the number allowed by Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
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14. Permittee shall maintain a current list of all thermally enhanced production wells associated with this operation; shall update the list whenever a well is added, replaced, or deleted; and such listing shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain for a period of five years, accurate records of fugitive inspection component counts, leak screening values in excess of 10,000 ppm, and shall, as approved by the District, calculate fugitive emissions using February 1999 CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c. Permittee shall make records of component counts, screening values, and calculations readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1548-423	0	621	0	0	0
Total	0	621	0	0	0

ATTACHMENT D

Application



RECEIVED
NOV 12 2014

SJVAPCD
Southern Region

November 12, 2014

Mr. Leonard Scandura
San Joaquin Valley APCD
34946 Flyover Court
Bakersfield, CA 93308

RE: Title V Minor Modification – Thermally Enhanced Production Wells with Closed Casing Vents S-1548-423-8

Dear Mr. Scandura:

Aera Energy LLC (Aera) requests that the Title V permit for Facility S-1548 be modified to implement Authority to Construct number S-1548-423-8 into the Title V permit. Enclosed for your review please find the following:

- Application for Title V Modification (TVFORM-008)
- Copy of the Title V Compliance Certification (TVFORM-009).
- Copy of the referenced ATC(s)

Should you have any questions or require additional information please contact Mr. Jonathan Le Van at phone number (661) 665-4403.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Le Van", is written over a white background.

Jonathan Le Van
Compliance Assurance Specialist

Enclosures

San Joaquin Valley Air Pollution Control District

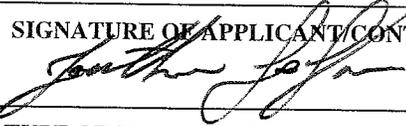
APPLICATION FOR TITLE V MODIFICATION:

RECEIVED

- ADMINISTRATIVE AMENDMENT
- MINOR MODIFICATION
- SIGNIFICANT MODIFICATION

NOV 12 2014

**SJVAPCD
Southern Region**

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">AERA ENERGY LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: CITY: <u>P.O. BOX 11164</u> STATE: <u>CA</u> ^{9-DIGIT} ZIP CODE: <u>93389-1164</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Light Oil Western (S-1548)</u> CITY: <u>Various locations in light oil western</u> <u>Various</u> 1/4 SECTION <u>Various</u> TOWNSHIP <u>Various</u> RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS:	
5. Oil and gas production	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOV/NTC No.: _____	
8. SIGNATURE OF APPLICANT/CONTACT PERSON: 	TYPE OR PRINT TITLE OF APPLICANT: Compliance Assurance Specialist
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Jonathan Le Van	DATE: November 11, 2014
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-4403

FOR APCD USE ONLY:

<p>DATE RECEIVED</p> <p>NOV 12 2014</p> <p>SJVAPCD Southern Region</p>	<p>FILING FEE RECEIVED: \$ _____ /</p> <p>DATE PAID: _____</p> <p>PROJECT NO.: <u>S-1144267</u> FACILITY REGION & ID: <u>S-1548</u></p>
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Various

San Joaquin Valley Unified Air Pollution Control District

Mailing Address: Central Regional Office * 1990 Gettysburg Avenue * Fresno, CA 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

TVFORM-008

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM
RECEIVED**

NOV 12 2014

**SJVAPCD
Southern Region**

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

Convert ATC S-1548-423-8 to PTO with operating conditions incorporated into the Title V permit.

COMPANY NAME: AERA ENERGY LLC	FACILITY ID: S-1548
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: AERA ENERGY LLC	
3. Agent to the Owner: N/A	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- 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) which the source is in compliance.
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

T. A. Bivens 02/18/14

Signature of Responsible Official

11-11-14

Date

T. A. Bivens

Name of Responsible Official (please print)

Process Supervisor

Title of Responsible Official (please print)



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1548-423-8

ISSUANCE DATE: 11/10/2014

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1,170 THERMALLY ENHANCED PRODUCTION WELLS WITH CLOSED CASING VENTS: ADD 200 THERMALLY ENHANCED PRODUCTION WELLS

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 202 lb, 2nd quarter - 202 lb, 3rd quarter - 202 lb, and fourth quarter - 202 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
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Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

S-1548-423-8 Nov 10 2014 1:54PM -- DAVIDS08 Joint Inspection NOT Required

6. Thermally enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
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ATTACHMENT E

Previous Title V Operating Permit
S-1548-423-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-423-6

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

1,170 THERMALLY ENHANCED PRODUCTION WELLS WITH CLOSED CASING VENTS

PERMIT UNIT REQUIREMENTS

1. Well casing valves shall remain closed or connected to production lines at all times except during periods of actual service or repair as defined in Rule 4401. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall maintain for a period of five years, accurate records of fugitive inspection component counts, leak screening values in excess of 10,000 ppm, and shall, as approved by the District, calculate fugitive emissions using February 1999 CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c. Permittee shall make records of component counts, screening values, and calculations readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.