

**VENOCO**  
INC.

6267 Carpinteria Ave., Suite 200  
Carpinteria, CA 93013-1423  
805.745.2100  
Fax 805.745.1846

May 15, 2008

Mr. Keith Duval  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

**Re: Part 70 Annual Compliance Certification Report for Platform Grace -  
Reporting Period of April 1, 2007 through March 31, 2008**

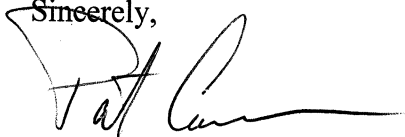
Dear Mr. Duval:

Pursuant to the requirements of the Title V Part 70 Federal Operating Permit No. 1493, Venoco, Inc. is submitting the Platform Grace Part 70 Annual Compliance Certification Report for the reporting period of April 1, 2007 through March 31, 2008.

It should be noted that the Platform Grace rolling 12-month equipment usage and fuel consumption data is only attached to the Compliance Certification Permit Form for Permit Condition Number 74.9N.3. This rolling 12-month data is referenced on several other Compliance Certification Permit Forms.

If you have questions or need additional information, please call me at (805) 745-2264.

Sincerely,



Patrick T. Corcoran  
Environmental Coordinator

Encl.

Cc: Gerardo Rios, U.S. EPA Region 9

RECEIVED  
VENTURA COUNTY  
08 MAY 19 PM 1:21  
A.P.C.D.

Ventura County Air Pollution Control District  
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 1 of 2

**Instructions**

This compliance certification cover sheet signed by the responsible official, Form TVPF45, must be submitted annually, on the anniversary date of the Part 70 permit; or on a more frequent schedule, if required by an applicable requirement or permit condition. To complete the compliance certification, you will need to attach the following to this sheet:

1. A completed compliance certification permit form (Form TVPF46) for each applicable requirement or Part 70 permit condition. Be sure to attach to the form any information specifically required to be submitted with the compliance certification by the applicable requirement or Part 70 permit condition. On this form, indicate the method(s) for determining compliance; if you are currently in compliance, as determined by the most recent monitoring measurement or observation; and whether the method(s) used for determining compliance indicate continuous or intermittent compliance during the period of certification. *Continuous* compliance should be checked if the source is in compliance as determined by all monitoring measurements required by the permit during the certification period. *Intermittent* compliance should be checked if any of these monitoring measurements, or any other information or data, indicates a failure to meet a term or condition of the permit, including a failure to monitor, report, or collect data as required by the permit. For example, if the permit requires an annual source test to demonstrate compliance and that annual source test indicates compliance, and no pre-test or other information indicated noncompliance during the period, compliance is considered to be *continuous* for the reporting period. If the answer to Question No. 4, 5 or 6 is "Yes" on compliance certification permit form TVPF46, compliance cannot be considered *continuous* without some further explanation or documentation.

In addition, for the time period covered by the certification, please identify any excursions or exceedances as indicated by the monitoring data. Also identify any information or data beyond the required monitoring that indicates that you are not in compliance. Note that you may cross reference any previous reports regarding compliance status that have previously been submitted to the District.

2. For each applicable requirement or Part 70 permit condition that requires compliance with a quantifiable emission rate, attach a completed quantifiable applicable requirement or Part 70 permit condition form (TVPF47) to Form TVPF46 for all emission units subject to the requirement or condition. On this form, please indicate the emission units subject to the requirement or condition; the pollutant regulated by the requirement or condition; the most recent measured emission rate, and the limited emission rate, both in units consistent with the requirement or condition; and a specific source test or monitoring record citation including the test date.

In lieu of filling out Forms TVPF46 and/or TVPF47, you may supply all of the necessary information required on the attached forms in your own format, and attach this information to Form TVPF45.

Ventura County Air Pollution Control District  
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 2 of 2

A copy of each compliance certification shall be submitted to EPA Region IX at the following address:

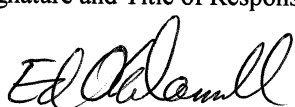
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Confidentiality**

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

**Certification by Responsible Official**

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: <i>Sr. Vice Pres.</i>	Date: <i>5/15/08</i>
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Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
 Applicable Requirement or Part 70 Permit Condition Attachment  
 Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 71.1N1	Description: Tanks that are equipped with vapor recovery.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fugitive I&M Program under Rule 74.10 for the tank hatches and other inlet and outlet gas and liquid piping connections; storage tank vapor recovery system for each applicable tank is monitored on a quarterly basis which includes inspection of the gas compressor, hatches, relief valves, pressure regulators, and flare; dated records of the quarterly inspections and tank maintenance activities are maintained at the facility; verbal notice of maintenance activities; Annual compliance certification verifying tanks are equipped with vapor recovery

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment  
Form TVPF46/07-21-03 Page 2 of 2

6.  Yes  No      During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:  
  04   /   01   /   07   (MM/DD/YY) to   03   /   31   /   08   (MM/DD/YY)

Ventura County Air Pollution Control District  
COMPLIANCE CERTIFICATION PERMIT FORM  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 71.4N3	Description: Sumps, pits, or ponds exempt from being required to have a cover which is impermeable to ROC vapors, and covers at least 90% of the liquid surface area; Low ROC exemption
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual validation/compliance certification that the tanks are exempt via independent laboratory analysis by EPA Method 8015 showing tank ROC content is < 5mg/l. *See attached ROC analytical results for T-2 and T-13.*

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6.  Yes  No      During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
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Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)



Oilfield Environmental and Compliance, INC.

Venoco, Inc. - Carpinteria  
5675 Carpinteria Ave.  
Carpinteria CA, 93013

Project: Annual Samples - Platform Gail & Grace  
Project Number: [none]  
Project Manager: Roger Westfall

Reported:  
23-Jan-08 08:21

**Plt. Grace Inlet To T-13**  
**0800092-05 (Water)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**Oilfield Environmental and Compliance**

**ROC by 8260M**

ROC (C3-C10)	ND	50	ug/L	1	A801134	14-Jan-08	14-Jan-08	EPA 8260
Surrogate: Dibromofluoromethane		105 %	70-130		"	"	"	"
Surrogate: Toluene-d8		98.0 %	70-130		"	"	"	"
Surrogate: 4-Bromofluorobenzene		101 %	70-130		"	"	"	"

**Plt. Grace Inlet To T-2**  
**0800092-06 (Water)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**Oilfield Environmental and Compliance**

**ROC by 8260M**

ROC (C3-C10)	54	50	ug/L	1	A801134	14-Jan-08	14-Jan-08	EPA 8260
Surrogate: Dibromofluoromethane		104 %	70-130		"	"	"	"
Surrogate: Toluene-d8		98.7 %	70-130		"	"	"	"
Surrogate: 4-Bromofluorobenzene		102 %	70-130		"	"	"	"

Oilfield Environmental and Compliance

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

307 Roemer Way, Suite 300, Santa Maria, CA 93454

www.oecusa.com

TEL: (805) 922-4772  
FAX: (805) 925-3376



Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.9N3	Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – NO <sub>x</sub> , ROC, and CO emission limits after January 1, 1997.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual source test of the G-03 generator using the following methods: ARB Method 100 for NO<sub>x</sub>, ARB Method 100 for CO, EPA Method 25 or EPA Method 18 for ROC, ARB Method 100 for oxygen content, and ASTM Method 1826-77 for gaseous fuel heating value. Engine inspections per the Engine Operator Inspection Plan. Inspection log containing identification and location of the generator, date and results of each emission inspection, and a summary of any emissions corrective maintenance action taken. Report submitted every 6 months consisting of the following: annual amount of fuel consumed; engine data including engine manufacturer, model number, operator identification number, and engine location, summary of maintenance and testing reports; annual source test report. **See attached Rolling 12-Month data for fuel consumption. Annual source test data is attached.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

COMPLIANCE CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. (*see attached*)

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

**Platform Grace  
PTO No. 1493 Equipment Usage  
Rolling 12-Months Ending:  
Apr-07**

Equipment	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	364.0	418.4	358.0	486.0	562.0	678.0	154.0	265.0	210.7	248.0	144.0	0.0	Gal/mo	3,888.1	N/A	Gal/yr
South Crane	0.0	142.0	126.0	82.5	200.0	56.0	150.0	0.0	0.0	65.0	75.0	77.0	Gal/mo	973.5	N/A	Gal/yr
<b>Crane Total</b>	<b>364.0</b>	<b>560.4</b>	<b>484.0</b>	<b>568.5</b>	<b>762.0</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>Gal/mo</b>	<b>4,862</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	113.0	93.0	70.0	505.0	359.0	266.0	111.0	118.0	114.0	99.0	119.0	145.0	MSCF/mo	2.11	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	4.0	0.0	66.0	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.12	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>113.0</b>	<b>97.0</b>	<b>70.0</b>	<b>571.0</b>	<b>411.0</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>MSCF/mo</b>	<b>2.23</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	607.0	1,503.0	1,302.0	3,257.0	1,320.0	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	Gal/mo	12,952.00	55,900	Gal/yr
G3	1.7	1.8	2.2	1.6	2.3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	MMSCF/mo	25.94	51.10	MMSCF/yr
48 BHP Starter Engine	13.0	0.0	35.0	0.0	40.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	Gal/mo	89.00	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	10.6	0.0	0.0	22.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	32.60	Exempt	Gal/yr
Portable Equipment	622.0	52.6	495.0	264.5	216.0	156.0	311.0	10.0	0.0	0.0	0.0	131.0	Gal/mo	2,258.06	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3950	MBbl/yr
Solvent Usage																
Z-Sol	5.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lbs/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/gal
<b>Total Solvents</b>	<b>5.0</b>	<b>3.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.01</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	164.5	881.0	140.0	89.0	154.0	19.0	2.0	0.0	0.0	0.0	29.3	7.4	Gal/mo	1,486.20	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	5,345.0	6,466.5	7,334.3	1,976.4	2,634.7	5,379.5	3,893.9	5,087.9	5,242.4	3,485.6	4,261.2	2,621.6	Gal/mo	53,709	N/A	Gal/yr
Work Boat Fuel:	425.4	3,884.9	4,916.1	4,237.8	4,100.9	3,536.9	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	Gal/mo	35,796	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>5,770.4</b>	<b>10,351.4</b>	<b>12,250.4</b>	<b>6,214.2</b>	<b>6,735.6</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,485.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>Gal/mo</b>	<b>89,505</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.10	0.17	0.20	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	Tons/mo	1.48	1.90	Tons/yr at 33.15 lbs/MMGal
NOx	1.62	2.90	3.44	1.74	1.89	2.50	2.23	2.68	1.47	0.97	1.53	2.13	Tons/mo	25.11	32.11	Tons/yr at 561.00 lbs/MMGal
PM	0.10	0.17	0.21	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	Tons/mo	1.50	1.92	Tons/yr at 33.50 lbs/MMGal
SOx	0.02	0.04	0.05	0.02	0.03	0.03	0.03	0.04	0.02	0.01	0.02	0.03	Tons/mo	0.34	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.29	0.53	0.62	0.32	0.34	0.45	0.41	0.49	0.27	0.18	0.28	0.39	Tons/mo	4.56	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**May-07**

Equipment	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	418.4	358.0	486.0	562.0	678.0	154.0	265.0	210.7	248.0	144.0	0.0	0.0	Gal/mo	3,524.1	N/A	Gal/yr
South Crane	142.0	126.0	82.5	200.0	56.0	150.0	0.0	0.0	65.0	75.0	77.0	172.0	Gal/mo	1,145.5	N/A	Gal/yr
<b>Crane Total</b>	<b>560.4</b>	<b>484.0</b>	<b>568.5</b>	<b>762.0</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>Gal/mo</b>	<b>4,670</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption: Planned (HP+LP)	93.0	70.0	505.0	359.0	266.0	111.0	118.0	114.0	99.0	119.0	145.0	145.0	MSCF/mo	2.14	N/A	MMSCF/yr
Unplanned (HP+LP)	4.0	0.0	66.0	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.12	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>97.0</b>	<b>70.0</b>	<b>571.0</b>	<b>411.0</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>MSCF/mo</b>	<b>2.27</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators: G2 (Emergency)	1,503.0	1,302.0	3,257.0	1,320.0	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	Gal/mo	12,345.00	55,980	Gal/yr
G3	1.8	2.2	1.6	2.3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	1.7	MMSCF/mo	25.94	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	35.0	0.0	40.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	3.0	Gal/mo	79.00	7,315.00	Gal/yr
P-19 Firewater Pump	10.6	0.0	0.0	22.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	32.60	Exempt	Gal/yr
Portable Equipment	52.6	495.0	264.5	216.0	156.0	311.0	10.0	0.0	0.0	0.0	131.0	92.0	Gal/mo	1,728.06	Exempt	Gal/yr
Tanks Throughputs T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.008	3960	MBbl/yr
Solvent Usage Z-Sol	3.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>3.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.01</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	881.0	140.0	89.0	154.0	19.0	2.0	0.0	0.0	0.0	29.3	7.4	78.8	Gal/mo	1,400.51	Exempt	Gal/yr
Boats: Crew Boat Fuel:	6,466.5	7,334.3	1,976.4	2,634.7	5,379.5	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	Gal/mo	54,258	N/A	Gal/yr
Work Boat Fuel:	3,884.9	4,916.1	4,237.8	4,100.9	3,536.9	4,063.4	4,452.9	0.0	0.0	1,199.7	4,985.8	0.0	Gal/mo	35,370	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>10,351.4</b>	<b>12,250.4</b>	<b>6,214.2</b>	<b>6,735.6</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,460.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>Gal/mo</b>	<b>89,628</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons ROX	0.17	0.20	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	Tons/mo	1.49	1.90	Tons/yr at 33.15 lbs/MGal
NOX	2.90	3.44	1.74	1.89	2.50	2.23	2.68	1.47	0.97	1.53	2.13	1.65	Tons/mo	25.14	32.11	Tons/yr at 861.00 lbs/MGal
PM	0.17	0.21	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	Tons/mo	1.50	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.04	0.05	0.02	0.03	0.03	0.03	0.04	0.02	0.01	0.02	0.03	0.02	Tons/mo	0.34	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.53	0.62	0.32	0.34	0.45	0.41	0.49	0.27	0.18	0.28	0.39	0.30	Tons/mo	4.57	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Jun-07**

Equipment	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	358.0	486.0	562.0	678.0	154.0	265.0	210.7	248.0	144.0	0.0	0.0	329.4	Gal/mo	3,435.1	N/A	Gal/yr
South Crane	126.0	82.5	200.0	56.0	150.0	0.0	0.0	65.0	75.0	77.0	172.0	81.0	Gal/mo	1,084.5	N/A	Gal/yr
<b>Crane Total</b>	<b>484.0</b>	<b>568.5</b>	<b>762.0</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>Gal/mo</b>	<b>4,520</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	70.0	505.0	359.0	266.0	111.0	118.0	114.0	99.0	119.0	145.0	145.0	264.0	MSCF/mo	2.32	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	66.0	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.12	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>70.0</b>	<b>571.0</b>	<b>411.0</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>MSCF/mo</b>	<b>2.43</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	1,302.0	3,257.0	1,320.0	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	Gal/mo	10,842.00	55,900	Gal/yr
G3	2.2	1.6	2.3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	MMSCF/mo	26.28	51.10	MMSCF/yr
48 BHP Starter Engine	35.0	0.0	40.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	3.0	0.0	Gal/mo	79.00	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	22.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	Gal/mo	36.00	Exempt	Gal/yr
Portable Equipment	495.0	264.5	216.0	156.0	311.0	10.0	0.0	0.0	0.0	131.0	92.0	0.0	Gal/mo	1,675.46	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>Gal/mo</b>	<b>0.01</b>	<b>4.46</b>	<b>Tons/yr ROC</b>
Coatings	140.0	89.0	154.0	19.0	2.0	0.0	0.0	0.0	29.3	7.4	78.8	0.0	Gal/mo	519.51	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	7,334.3	1,976.4	2,634.7	5,379.5	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	Gal/mo	52,037	N/A	Gal/yr
Work Boat Fuel:	4,916.1	4,237.8	4,100.9	3,538.9	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	Gal/mo	32,020	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>12,250.4</b>	<b>6,214.2</b>	<b>6,735.6</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>Gal/mo</b>	<b>84,057</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.20	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	Tons/mo	1.39	1.90	Tons/yr at 33.15 lbs/MMGal
NOX	3.44	1.74	1.89	2.50	2.23	2.68	1.47	0.97	1.53	2.13	1.65	1.34	Tons/mo	23.58	32.71	Tons/yr at 561.00 lbs/MMGal
PM	0.21	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	Tons/mo	1.41	1.92	Tons/yr at 33.50 lbs/MMGal
SOX	0.05	0.02	0.03	0.03	0.03	0.04	0.02	0.01	0.02	0.03	0.02	0.02	Tons/mo	0.32	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.62	0.32	0.34	0.45	0.41	0.49	0.27	0.18	0.28	0.39	0.30	0.24	Tons/mo	4.29	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Jul-07**

Equipment	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	486.0	562.0	678.0	154.0	265.0	210.7	248.0	144.0	0.0	0.0	329.4	0.0	Gal/mo	3,077.1	N/A	Gal/yr
South Crane	82.5	200.0	56.0	150.0	0.0	0.0	65.0	75.0	77.0	172.0	81.0	96.0	Gal/mo	1,054.5	N/A	Gal/yr
<b>Crane Total</b>	<b>568.5</b>	<b>762.0</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>Gal/mo</b>	<b>4,132</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption: Planned (HP+LP)	505.0	359.0	266.0	111.0	118.0	114.0	99.0	119.0	145.0	145.0	264.0	104.0	MSCF/mo	2.35	N/A	MMSCF/yr
Unplanned (HP+LP)	66.0	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.12	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>571.0</b>	<b>411.0</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>MSCF/mo</b>	<b>2.47</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	3,257.0	1,320.0	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	1,004.0	Gal/mo	10,544.00	55,900	Gal/yr
G3	1.6	2.3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	2.1	MMSCF/mo	26.18	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	40.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	3.0	0.0	0.0	Gal/mo	64.00	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	22.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	Gal/mo	36.00	Exempt	Gal/yr
Portable Equipment	264.5	216.0	156.0	311.0	10.0	0.0	0.0	0.0	131.0	92.0	0.0	20.0	Gal/mo	1,200.46	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbls/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbls/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3960	MBbls/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	0.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	-0.0	Gal/mo	0.01	4.45	Tons/yr ROC
Coatings	89.0	154.0	19.0	2.0	0.0	0.0	0.0	29.3	7.4	78.8	0.0	33.5	Gal/mo	413.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	1,976.4	2,634.7	5,379.5	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	Gal/mo	46,623	N/A	Gal/yr
Work Boat Fuel:	4,237.8	4,100.9	3,538.9	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,782.0	Gal/mo	32,886	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>6,214.2</b>	<b>6,735.6</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>Gal/mo</b>	<b>79,508</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	Tons/mo	1.32	1.90	Tons/yr at 33.15 lbs/MMGal
NOx	1.74	1.89	2.50	2.23	2.68	1.47	0.97	1.53	2.13	1.65	1.34	2.16	Tons/mo	22.30	32.11	Tons/yr at 561.00 lbs/MMGal
PM	0.10	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	Tons/mo	1.33	1.92	Tons/yr at 33.50 lbs/MMGal
SOx	0.02	0.03	0.03	0.03	0.04	0.02	0.01	0.02	0.03	0.02	0.02	0.03	Tons/mo	0.30	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.32	0.34	0.45	0.41	0.49	0.27	0.18	0.28	0.39	0.30	0.24	0.39	Tons/mo	4.05	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Aug-07**

Equipment	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	562.0	678.0	154.0	265.0	210.7	248.0	144.0	0.0	0.0	329.4	0.0	796.0	Gal/mo	3,387.1	N/A	Gal/yr
South Crane	200.0	56.0	150.0	0.0	0.0	65.0	75.0	77.0	172.0	81.0	96.0	155.0	Gal/mo	1,127.0	N/A	Gal/yr
<b>Crane Total</b>	<b>762.0</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>Gal/mo</b>	<b>4,514</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	359.0	266.0	111.0	118.0	114.0	99.0	119.0	145.0	145.0	264.0	104.0	204.0	MSCF/mo	2.05	N/A	MMSCF/yr
Unplanned (HP+LP)	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>411.0</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>MSCF/mo</b>	<b>2.10</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	1,320.0	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	Gal/mo	10,577.00	55,900	Gal/yr
G3	2.3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	2.1	0.5	MMSCF/mo	25.02	51.10	MMSCF/yr
48 BHP Starter Engine	40.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	3.0	0.0	20.0	122.0	Gal/mo	186.08	7,315.00	Gal/yr
P-19 Firewater Pump	22.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	Gal/mo	36.00	Exempt	Gal/yr
Portable Equipment	216.0	156.0	311.0	10.0	0.0	0.0	0.0	131.0	92.0	0.0	20.0	49.0	Gal/mo	985.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.01</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	154.0	19.0	2.0	0.0	0.0	0.0	29.3	7.4	78.8	0.0	33.5	0.0	Gal/mo	324.01	Exempt	Gal/yr
<b>Boats:</b>																
Crew Boat Fuel:	2,634.7	5,379.5	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	Gal/mo	48,944	N/A	Gal/yr
Work Boat Fuel:	4,100.9	3,538.9	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,782.0	2,781.5	Gal/mo	31,429	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>6,735.6</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>Gal/mo</b>	<b>80,374</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	Tons/mo	1.33	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.89	2.50	2.23	2.68	1.47	0.97	1.53	2.13	1.65	1.34	2.16	1.99	Tons/mo	22.54	32.11	Tons/yr at 361.00 lbs/MGal
PM	0.11	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	Tons/mo	1.35	1.92	Tons/yr at 331.50 lbs/MGal
SOx	0.03	0.03	0.03	0.04	0.02	0.01	0.02	0.03	0.02	0.02	0.03	0.03	Tons/mo	0.30	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.34	0.45	0.41	0.49	0.27	0.18	0.28	0.39	0.30	0.24	0.39	0.36	Tons/mo	4.10	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gallyr, with any producing wells, limit is 7,344 gallyr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)

**Platform Grace  
PTO No. 1493 Equipment Usage  
Rolling 12-Months Ending:  
Sep-07**

Equipment	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Monthly Units	12-Month Total	Permit Limit	12-Mo. & Permit Units
North Crane	678.0	154.0	265.0	210.7	248.0	144.0	0.0	0.0	329.4	0.0	796.0	823.0	Gal/mo	3,648.1	N/A	Gal/yr
South Crane	56.0	150.0	0.0	0.0	65.0	75.0	77.0	172.0	81.0	96.0	156.0	109.5	Gal/mo	1,036.5	N/A	Gal/yr
<b>Crane Total</b>	<b>734.0</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>Gal/mo</b>	<b>4,685</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	266.0	111.0	118.0	114.0	99.0	119.0	145.0	145.0	264.0	104.0	204.0	194.0	MSCF/mo	1.88	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	MSCF/mo	0.02	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>266.0</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>MSCF/mo</b>	<b>1.91</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	0.0	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	Gal/mo	9,477.00	55,900	Gal/yr
G3	2.5	2.3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	MMSCF/mo	22.70	51.40	MMSCF/yr
48 BHP Starter Engine	0.0	0.0	0.0	1.0	0.0	0.0	0.0	3.0	0.0	20.0	122.0	645.0	Gal/mo	791.00	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	55.0	Gal/mo	69.00	Exempt	Gal/yr
Portable Equipment	156.0	311.0	10.0	0.0	0.0	0.0	131.0	92.0	0.0	20.0	49.0	0.0	Gal/mo	769.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	Gal/mo	0.01	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Def	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>Gal/mo</b>	<b>0.01</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	19.0	2.0	0.0	0.0	0.0	29.3	7.4	78.8	0.0	33.5	0.0	0.0	Gal/mo	170.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	5,379.5	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	Gal/mo	51,697	N/A	Gal/yr
Work Boat Fuel:	3,538.9	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,782.0	2,781.5	4,886.3	Gal/mo	32,185	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>8,918.4</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>Gal/mo</b>	<b>83,882</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	Tons/mo	1.39	1.90	Tons/yr at 33.15 lbs/MMGal
NOx	2.50	2.23	2.68	1.47	0.97	1.53	2.13	1.65	1.34	2.16	1.99	2.87	Tons/mo	23.53	32.11	Tons/yr at 561.00 lbs/MMGal
PM	0.15	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	Tons/mo	1.41	1.92	Tons/yr at 331.50 lbs/MMGal
SOx	0.03	0.03	0.04	0.02	0.01	0.02	0.03	0.02	0.02	0.03	0.03	0.04	Tons/mo	0.31	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.45	0.41	0.49	0.27	0.18	0.28	0.39	0.30	0.24	0.39	0.36	0.52	Tons/mo	4.28	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2006)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)



**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Oct-07**

Equipment	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	154.0	265.0	210.7	248.0	144.0	0.0	0.0	329.4	0.0	796.0	823.0	1,094.0	Gal/mo	4,064.1	N/A	Gal/yr
South Crane	150.0	0.0	0.0	65.0	75.0	77.0	172.0	81.0	96.0	156.0	109.5	146.0	Gal/mo	1,126.5	N/A	Gal/yr
<b>Crane Total</b>	<b>304.0</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>Gal/mo</b>	<b>5,191</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	111.0	118.0	114.0	99.0	119.0	145.0	145.0	264.0	104.0	204.0	194.0	116.0	MSCF/mo	1.73	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	1.0	MSCF/mo	0.03	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>111.0</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>117.0</b>	<b>MSCF/mo</b>	<b>1.76</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	746.0	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	88.0	Gal/mo	9,565.00	55,900	Gal/yr
G3	2.3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	0.0	MMSCF/mo	20.18	51.10	MMSCF/yr
48 BHP Stair Engine	0.0	0.0	1.0	0.0	0.0	0.0	3.0	0.0	20.0	122.0	645.0	61.0	Gal/mo	852.00	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	55.0	0.0	Gal/mo	69.00	Exempt	Gal/yr
Portable Equipment	311.0	10.0	0.0	0.0	0.0	131.0	92.0	0.0	20.0	49.0	0.0	0.0	Gal/mo	613.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>5.0</b>	<b>Gal/mo</b>	<b>0.02</b>	<b>4.46</b>	<b>Tons/yr ROC</b>
Coatings	2.0	0.0	0.0	0.0	29.3	7.4	78.8	0.0	33.5	0.0	0.0	0.0	Gal/mo	151.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	3,893.9	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	Gal/mo	52,166	N/A	Gal/yr
Work Boat Fuel:	4,063.4	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,762.0	2,781.5	4,856.3	3,833.6	Gal/mo	32,479	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>7,957.3</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>9,682.4</b>	<b>Gal/mo</b>	<b>84,646</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
NOx	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	Tons/mo	1.40	1.90	Tons/yr at 39.45 lbs/MMGal
PM	2.23	2.68	1.47	0.97	1.53	2.13	1.65	1.34	2.16	1.99	2.87	2.72	Tons/mo	23.74	32.11	Tons/yr at 561.00 lbs/MMGal
SOx	0.13	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	Tons/mo	1.42	1.92	Tons/yr at 33.50 lbs/MMGal
CO	0.03	0.04	0.02	0.01	0.02	0.03	0.02	0.02	0.03	0.03	0.04	0.04	Tons/mo	0.32	0.42	Tons/yr at 7.50 lbs/MMGal
	0.41	0.49	0.27	0.18	0.28	0.39	0.30	0.24	0.39	0.36	0.52	0.49	Tons/mo	4.32	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Nov-07**

Equipment	Dec-06	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	265.0	210.7	248.0	144.0	0.0	0.0	329.4	0.0	796.0	823.0	1,094.0	1,002.0	Gal/mo	4,912.1	N/A	Gal/yr
South Crane	0.0	0.0	65.0	75.0	77.0	172.0	81.0	96.0	155.0	109.5	146.0	160.0	Gal/mo	1,136.5	N/A	Gal/yr
<b>Crane Total</b>	<b>265.0</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>1,162.0</b>	<b>Gal/mo</b>	<b>6,049</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	118.0	114.0	99.0	119.0	145.0	145.0	264.0	104.0	204.0	194.0	116.0	146.0	MSCF/mo	1.77	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	1.0	105.0	MSCF/mo	0.13	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>118.0</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>117.0</b>	<b>251.0</b>	<b>MSCF/mo</b>	<b>1.90</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	0.0	3,558.0	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	86.0	0.0	Gal/mo	8,819.00	55,900	Gal/yr
G3	2.4	1.9	2.3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	0.0	1.5	MMSCF/mo	19.41	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	1.0	0.0	0.0	0.0	3.0	0.0	20.0	122.0	645.0	61.0	104.0	Gal/mo	966.00	7,316.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	55.0	0.0	52.0	Gal/mo	122.00	Exempt	Gal/yr
Portable Equipment	10.0	0.0	0.0	0.0	131.0	92.0	0.0	20.0	49.0	0.0	0.0	174.0	Gal/mo	476.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	Bbls/mo	0.066	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	Bbls/mo	0.066	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	132.0	Bbls/mo	0.132	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>5.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.02</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	0.0	0.0	0.0	29.3	7.4	78.8	0.0	33.5	0.0	0.0	0.0	0.0	Gal/mo	149.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	5,087.9	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	6,434.0	Gal/mo	54,706	N/A	Gal/yr
Work Boat Fuel:	4,452.9	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,782.0	2,781.5	4,896.3	3,833.6	4,275.6	Gal/mo	32,692	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>9,540.8</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,283.5</b>	<b>9,682.4</b>	<b>10,709.6</b>	<b>Gal/mo</b>	<b>87,398</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	Tons/mo	1.45	1.90	Tons/yr at 33.15 lbs/MGal
NOx	2.68	1.47	0.97	1.53	2.13	1.65	1.34	2.16	1.99	2.87	2.72	3.00	Tons/mo	24.52	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.16	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	Tons/mo	1.46	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.04	0.02	0.01	0.02	0.03	0.02	0.02	0.03	0.03	0.04	0.04	0.04	Tons/mo	0.33	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.49	0.27	0.18	0.28	0.39	0.30	0.24	0.39	0.36	0.52	0.49	0.55	Tons/mo	4.46	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Dec-07**

Equipment	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	210.7	248.0	144.0	0.0	0.0	328.4	0.0	798.0	823.0	1,094.0	1,022.0	1,164.0	Gal/mo	5,811.1	N/A	Gal/yr
South Crane	0.0	65.0	75.0	77.0	172.0	81.0	96.0	155.0	109.5	146.0	160.0	114.0	Gal/mo	1,250.5	N/A	Gal/yr
<b>Crane Total</b>	<b>210.7</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>1,162.0</b>	<b>1,278.0</b>	<b>Gal/mo</b>	<b>7,062</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	114.0	99.0	119.0	145.0	145.0	264.0	104.0	204.0	194.0	116.0	146.0	154.0	MSCF/mo	1.80	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	0.0	1.0	105.0	686.0	MSCF/mo	0.82	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>114.0</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>194.0</b>	<b>117.0</b>	<b>251.0</b>	<b>840.0</b>	<b>MSCF/mo</b>	<b>2.62</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	3,555.0	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	88.0	0.0	0.0	Gal/mo	8,819.00	55,900	Gal/yr
G3	1.9	2.3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	0.0	1.5	2.6	MMSCF/mo	19.54	51.10	MMSCF/yr
48 BHP Starter Engine	1.0	0.0	0.0	0.0	3.0	0.0	20.0	122.0	645.0	61.0	104.0	211.8	Gal/mo	1,167.86	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	55.0	0.0	53.0	87.0	Gal/mo	209.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	131.0	92.0	0.0	20.0	49.0	0.0	0.0	174.0	146.0	Gal/mo	612.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	Bbls/mo	0.513	20	MBBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	Bbls/mo	0.513	20	MBBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	132.0	893.0	Bbls/mo	1.025	3960	MBBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	Gal/mo	0.02	4.45	Tons/yr ROC
Coatings	0.0	0.0	29.3	7.4	78.8	0.0	33.5	0.0	0.0	0.0	0.0	0.0	Gal/mo	149.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	5,242.4	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	6,434.0	7,494.8	Gal/mo	57,113	N/A	Gal/yr
Work Boat Fuel:	0.0	0.0	1,189.7	4,985.8	0.0	534.5	5,782.0	2,781.5	4,866.3	3,833.6	4,275.6	4,825.1	Gal/mo	33,064	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>5,242.4</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>9,682.4</b>	<b>10,709.6</b>	<b>12,319.9</b>	<b>Gal/mo</b>	<b>90,177</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROX	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.20	Tons/mo	1.49	1.90	Tons/yr at 33.15 lbs/MGal
NOX	1.47	0.97	1.53	2.13	1.65	1.34	2.16	1.99	2.87	2.72	3.00	3.46	Tons/mo	25.29	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.09	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.21	Tons/mo	1.51	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.02	0.01	0.02	0.03	0.02	0.02	0.03	0.03	0.04	0.04	0.04	0.05	Tons/mo	0.34	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.27	0.18	0.28	0.39	0.30	0.24	0.39	0.36	0.52	0.49	0.55	0.63	Tons/mo	4.60	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Jan-08**

Equipment	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	248.0	144.0	0.0	0.0	329.4	0.0	796.0	823.0	1,094.0	1,002.0	1,164.0	767.0	Gal/mo	6,367.4	N/A	Gal/yr
South Crane	65.0	75.0	77.0	172.0	81.0	96.0	155.0	109.5	146.0	160.0	114.0	161.0	Gal/mo	1,411.5	N/A	Gal/yr
<b>Crane Total</b>	<b>313.0</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>1,162.0</b>	<b>1,278.0</b>	<b>928.0</b>	<b>Gal/mo</b>	<b>7,779</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	99.0	119.0	145.0	145.0	264.0	104.0	204.0	194.0	116.0	146.0	154.0	176.0	MSCF/mo	1.87	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	1.0	105.0	686.0	0.0	MSCF/mo	0.82	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>99.0</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>117.0</b>	<b>251.0</b>	<b>840.0</b>	<b>176.0</b>	<b>MSCF/mo</b>	<b>2.68</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	37.0	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	86.0	0.0	0.0	64.0	Gal/mo	5,325.00	55,900	Gal/yr
G3	2.3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	0.0	1.5	2.6	1.8	MMSCF/mo	19.39	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	0.0	0.0	3.0	0.0	20.0	122.0	645.0	61.0	104.0	211.8	68.0	Gal/mo	1,234.80	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	14.0	0.0	0.0	55.0	0.0	53.0	87.0	242.0	Gal/mo	451.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	131.0	92.0	0.0	20.0	49.0	0.0	0.0	174.0	146.0	819.0	Gal/mo	1,431.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	Bbls/mo	0.513	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	Bbls/mo	0.513	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	132.0	893.0	0.0	Bbls/mo	1.025	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>5.0</b>	<b>0.0</b>	<b>9.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.02</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	0.0	29.3	7.4	78.8	0.0	33.5	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	149.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	3,465.6	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	6,434.0	7,494.8	4,599.6	Gal/mo	56,470	N/A	Gal/yr
Work Boat Fuel:	0.0	1,189.7	4,965.8	0.0	534.5	5,782.0	2,781.5	4,866.3	3,833.6	4,275.6	4,825.1	2,948.1	Gal/mo	36,012	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,465.6</b>	<b>5,450.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>9,682.4</b>	<b>10,709.6</b>	<b>12,319.9</b>	<b>7,547.7</b>	<b>Gal/mo</b>	<b>92,482</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.20	0.13	Tons/mo	1.53	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.97	1.53	2.13	1.65	1.34	2.16	1.99	2.87	2.72	3.00	3.46	2.12	Tons/mo	25.94	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.21	0.13	Tons/mo	1.55	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.02	0.03	0.02	0.02	0.03	0.03	0.04	0.04	0.04	0.05	0.03	Tons/mo	0.35	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.18	0.28	0.39	0.30	0.24	0.39	0.36	0.52	0.49	0.55	0.63	0.38	Tons/mo	4.72	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Feb-08**

Equipment	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	144.0	0.0	0.0	329.4	0.0	796.0	823.0	1,094.0	1,002.0	1,164.0	767.0	202.0	Gal/mo	6,321.4	N/A	Gal/yr
South Crane	75.0	77.0	172.0	81.0	96.0	155.0	109.5	146.0	160.0	114.0	161.0	0.0	Gal/mo	1,346.5	N/A	Gal/yr
<b>Crane Total</b>	<b>219.0</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>1,162.0</b>	<b>1,278.0</b>	<b>928.0</b>	<b>202.0</b>	<b>Gal/mo</b>	<b>7,668</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
Flare Gas Consumption:																
Planned (HP+LP)	119.0	145.0	145.0	264.0	104.0	204.0	194.0	116.0	146.0	154.0	176.0	171.0	MSCF/mo	1.94	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	24.0	1.0	105.0	686.0	0.0	0.0	MSCF/mo	0.82	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>119.0</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>117.0</b>	<b>251.0</b>	<b>840.0</b>	<b>176.0</b>	<b>171.0</b>	<b>MSCF/mo</b>	<b>2.75</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	0.0	622.0	0.0	0.0	1,004.0	3,290.0	220.0	88.0	0.0	0.0	64.0	0.0	Gal/mo	5,288.00	55,900	Gal/yr
G3	2.6	2.3	1.7	2.1	2.1	0.5	0.0	0.0	1.5	2.6	1.8	2.6	MMSCF/mo	19.66	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	0.0	3.0	0.0	20.0	122.0	645.0	61.0	104.0	211.8	68.0	0.0	Gal/mo	1,294.86	7,315.00	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	14.0	0.0	0.0	55.0	0.0	53.0	87.0	242.0	0.0	Gal/mo	451.00	Exempt	Gal/yr
Portable Equipment	0.0	131.0	92.0	0.0	20.0	49.0	0.0	0.0	174.0	146.0	819.0	0.0	Gal/mo	1,431.00	Exempt	Gal/yr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	217.0	Bbls/mo	0.730	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	217.0	Bbls/mo	0.730	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	132.0	893.0	0.0	434.0	Bbls/mo	1.459	3960	MBbl/yr
Solvent Usage																
Z-Sol	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	5.0	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	0.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Coatings	29.3	7.4	78.8	0.0	33.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	149.01	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	4,261.2	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	6,434.0	7,494.8	4,599.6	5,280.8	Gal/mo	58,286	N/A	Gal/yr
Work Boat Fuel:	1,199.7	4,985.8	0.0	534.5	5,782.0	2,781.5	4,856.3	3,833.6	4,275.6	4,825.1	2,948.1	996.8	Gal/mo	37,009	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>5,460.9</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>9,682.4</b>	<b>10,709.6</b>	<b>12,319.9</b>	<b>7,547.7</b>	<b>6,277.6</b>	<b>Gal/mo</b>	<b>95,294</b>	<b>114,481</b>	<b>Gal/yr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.20	0.13	0.10	Tons/mo	1.58	1.90	Tons/yr at 33.15 lbs/MMGal
NOx	1.53	2.13	1.65	1.34	2.16	1.99	2.87	2.72	3.00	3.46	2.12	1.76	Tons/mo	26.73	32.11	Tons/yr at 561.60 lbs/MMGal
PM	0.09	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.21	0.13	0.11	Tons/mo	1.60	1.92	Tons/yr at 33.50 lbs/MMGal
SOx	0.02	0.03	0.02	0.02	0.03	0.03	0.04	0.04	0.04	0.05	0.03	0.02	Tons/mo	0.36	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.28	0.39	0.30	0.24	0.39	0.36	0.52	0.49	0.55	0.63	0.38	0.32	Tons/mo	4.96	5.84	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gallyr; with any producing wells, limit is 7,344 gallyr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace  
PTO No. 1493 Equipment Usage  
Rolling 12-Months Ending:  
Mar-08**

Equipment	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
North Crane	0.0	0.0	329.4	0.0	796.0	823.0	1,094.0	1,002.0	1,184.0	767.0	202.0	175.0	Gal/mo	6,352.4	N/A	Gallyr
South Crane	77.0	172.0	81.0	96.0	155.0	109.5	146.0	160.0	114.0	161.0	0.0	78.0	Gal/mo	1,349.3	N/A	Gallyr
<b>Crane Total</b>	<b>77.0</b>	<b>172.0</b>	<b>410.4</b>	<b>96.0</b>	<b>951.0</b>	<b>932.5</b>	<b>1,240.0</b>	<b>1,162.0</b>	<b>1,278.0</b>	<b>928.0</b>	<b>202.0</b>	<b>253.0</b>	<b>Gal/mo</b>	<b>7,702</b>	<b>13,344</b>	<b>Gallyr<sup>a</sup></b>
Flare Gas Consumption: Planned (HP+LP)	145.0	145.0	264.0	104.0	204.0	194.0	116.0	146.0	154.0	176.0	171.0	214.0	MSCF/mo	2.03	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	24.0	1.0	105.0	686.0	0.0	0.0	2,398.0	MSCF/mo	3.21	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
	Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-81 - Meter GR-83)															
<b>Flare Gas Total</b>	<b>145.0</b>	<b>145.0</b>	<b>264.0</b>	<b>104.0</b>	<b>204.0</b>	<b>218.0</b>	<b>117.0</b>	<b>251.0</b>	<b>840.0</b>	<b>176.0</b>	<b>171.0</b>	<b>2,612.0</b>	<b>MSCF/mo</b>	<b>5.25</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
Generators:																
G2 (Emergency)	622.0	0.0	0.0	1,004.0	3,290.0	220.0	88.0	0.0	0.0	64.0	0.0	0.0	Gal/mo	5,288.00	55,900	Gallyr
G3	2.3	1.7	2.1	2.1	0.5	0.0	0.0	1.5	2.6	1.8	2.6	3.2	MMSCF/mo	20.31	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	3.0	0.0	20.0	122.0	645.0	61.0	104.0	211.8	68.0	0.0	28.0	Gal/mo	1,262.80	7,315.00	Gallyr
P-19 Firewater Pump	0.0	0.0	14.0	0.0	55.0	0.0	0.0	53.0	87.0	242.0	0.0	19.0	Gal/mo	470.00	Exempt	Gallyr
Portable Equipment	131.0	92.0	0.0	20.0	49.0	0.0	0.0	174.0	146.0	819.0	0.0	0.0	Gal/mo	1,431.00	Exempt	Gallyr
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	217.0	1,309.5	Bbls/mo	2,039	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	66.0	446.5	0.0	217.0	1,309.5	Bbls/mo	2,039	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	132.0	893.0	0.0	434.0	2,619.0	Bbls/mo	4,078	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	5.0	0.0	0.0	5.0	5.0	0.0	9.0	0.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	<b>5.0</b>	<b>0.0</b>	<b>9.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.02</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Coatings	7.4	78.8	0.0	33.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	119.71	Exempt	Gallyr
Boats:																
Crew Boat Fuel:	2,621.6	5,893.6	4,246.0	1,920.0	4,298.0	5,387.2	5,848.8	6,434.0	7,494.8	4,599.6	5,280.8	1,616.4	Gal/mo	55,641	N/A	Gallyr
Work Boat Fuel:	4,985.8	0.0	534.5	5,782.0	2,781.5	4,856.3	3,833.6	4,275.6	4,825.1	2,948.1	996.8	2,134.3	Gal/mo	37,953	N/A	Gallyr
<b>Total Boat Fuel:</b>	<b>7,607.4</b>	<b>5,893.6</b>	<b>4,780.5</b>	<b>7,702.0</b>	<b>7,079.5</b>	<b>10,243.5</b>	<b>9,682.4</b>	<b>10,709.6</b>	<b>12,319.9</b>	<b>7,547.7</b>	<b>6,277.6</b>	<b>3,750.7</b>	<b>Gal/mo</b>	<b>93,594</b>	<b>114,481</b>	<b>Gallyr<sup>c</sup></b>
Boat Emissions: tons																
ROC	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.20	0.13	0.10	0.06	Tons/mo	1.55	1.90	Tons/yr at 33.15 lbs/MGal
NOx	2.13	1.65	1.34	2.16	1.99	2.87	2.72	3.00	3.46	2.12	1.76	1.05	Tons/mo	26.25	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.13	0.10	0.08	0.13	0.12	0.17	0.16	0.18	0.21	0.13	0.11	0.06	Tons/mo	1.57	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.03	0.02	0.02	0.03	0.03	0.04	0.04	0.04	0.05	0.03	0.02	0.01	Tons/mo	0.35	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.39	0.30	0.24	0.39	0.36	0.52	0.49	0.55	0.63	0.38	0.32	0.19	Tons/mo	4.77	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gallyr; with any producing wells, limit is 7,344 gallyr (Well A-8 brought back to production in February 2008)

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

## **ENGINE DATA FOR THE WAUKESHA ENGINE (G-03)**

**Engine Manufacturer:** Waukesha

**Model No.:** F3521G (SI)

**Serial No.:** 289729

**Engine Location:** Turbine room, southwest corner of platform, production deck

**Summary of Maintenance and Testing Reports are attached**

**Source Test Report:** Please refer to the last source test report dated January 25, 2008 which was previously submitted to the District. Enclosed are summary of results.

**PLATFORM GRACE  
GENERATOR SERVICE**

**DATE;1-27-07      UNIT; G-3**

**HOURS;36370**

**MECHANIC: John T. Montgomery**

**1500 HOUR SERVICE**

**REPLACE SPARK PLUGS:** YES  NO   
COMMENTS: \_\_\_\_\_

**CHANGE & CLEAN OIL FILTERS:** YES  NO   
COMMENTS: \_\_\_\_\_

**CHANGE CRANK CASE OIL:** YES  NO   
COMMENTS: \_\_\_\_\_

**REPLACE AIR FILTER:** YES  NO   
COMMENTS: \_\_\_\_\_

**REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS:** YES  NO   
COMMENTS: \_\_\_\_\_

**3000 HOUR SERVICE**

**ACID CLEAN CATALYST ELEMENT:** YES  NO   
COMMENTS: \_\_\_\_\_

**REPLACE O2 SENSOR** YES  NO   
COMMENTS: \_\_\_\_\_

**ADDITIONAL MAINTENANCE**

**DATE:1-27-07      HOURS:36370      MECHANIC : John T. Montgomery**  
COMMENTS:

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.



## Equipment Data

Equipment: G-3

Description: Generator

Fuel: Natural Gas

Manufacture: Waukesha

Model: F3521GS

Serial No.:28979

Horse Power: 773@1200

Rich Burn Engine

The following preventive maintenance has been perform per  
APCD rule & regulation, 74.9 on 1-27-207

Change spark plug- 6

Change Catalyst element

Change engine oil and filers, 16"

Change O2 sensors-2

Check valve train

Clean air filter

**PLATFORM GRACE  
GENERATOR SERVICE**

**DATE; 6-2-2007     UNIT; G-3**

**HOURS; 39321**

**MECHANIC: J. RICKMAN**

**1500 HOUR SERVICE**

**REPLACE SPARK PLUGS:** YES  NO   
COMMENTS: \_\_\_\_\_

---

**CHANGE & CLEAN OIL FILTERS:** YES  NO   
COMMENTS: CLEANED SPINNER FILTER, DID NOT CHANGE SOCK  
FILTERS.

---

**CHANGE CRANK CASE OIL:** YES  NO   
COMMENTS: \_\_\_\_\_

---

**REPLACE AIR FILTER:** YES  NO   
COMMENTS: \_\_\_\_\_

---

**REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS:** YES  NO   
COMMENTS: REPLACED WITH FRESH ACID WASHED UNITS.

---

**3000 HOUR SERVICE**

**ACID CLEAN CATALYST ELEMENT:** YES  NO   
COMMENTS: \_\_\_\_\_

---

**REPLACE O2 SENSOR** YES  NO   
COMMENTS: TURBO OUT ELBOW HAS STRIPPED O2 SENSOR PORT.  
ORDERING NEW ELBOW .

---

**ADDITIONAL MAINTENANCE**

**DATE: HOURS: MECHANIC :**

**COMMENTS: ORDERING NEW SOCK OIL FILTERS, AND TURBO OUT ELBOW**

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.

# WORK ORDER

Platform Grace



Work Order No.: GAIL-01663-(G-3 -Grace)-072106

Work Order Date: 7/21/2006 Assigned To: John Montgomery Assigned By: \_\_\_\_\_

Work Description: 1500 HR Service

## Equipment Data

Equipment: G-3 -Grace Description: Generator

Manufacturer: Waukesha Model No: F3521GS Serial No: 28979

Size: 9 3/8 x 8 1/2 HP: \_\_\_\_\_ Other Info: Engine run RPM 1200

Notes: Spec G30483 Run Hours: \_\_\_\_\_  
Account Code: \_\_\_\_\_

## Labor Data

Work Date	Employee	Company	Regular Hours	OT Hours
8/3/2006	John Montgomery	Venoco	4	0

## Comments:

## Task Details

Task Notes

Task Instruction	
Replace spark plugs	Yes____ No____
Change Oil Filters	Yes____ No____
Change Crank Case	Yes____ No____
Remove Blow out and trun catalyst element	Yes____ No
3000 Hour Service	
Acid clean catalyst element	Yes____ No____
Replace O2 sensor	

**PLATFORM GRACE  
GENERATOR SERVICE**

**DATE; 8/17/08**

**UNIT; G-3**

**HOURS;40,622**

**MECHANIC; Mike Reeves**

**1500 HOUR SERVICE**

**REPLACE SPARK PLUGS:**

YES  NO

COMMENTS: Checked valve adjustment

---

**CHANGE & CLEAN OIL FILTERS:**

YES  NO

COMMENTS: \_\_\_\_\_

---

**CHANGE CRANK CASE OIL:**

YES  NO

COMMENTS: \_\_\_\_\_

---

**REPLACE AIR FILTER:**

YES  NO

COMMENTS; Cleaned air filter.

---

**REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS: YES  NO**

COMMENTS: \_\_\_\_\_

---

**3000 HOUR SERVICE**

**ACID CLEAN CATALYST ELEMENT:**

YES  NO

COMMENTS: Changed catalytic elements

**REPLACE O2 SENSOR**

YES  NO

COMMENTS; Replaced O2 sensors in and out of catalytic element box.

**ADDITIONAL MAINTENANCE**

**DATE:** \_\_\_\_\_ **HOURS:** \_\_\_\_\_ **MECHANIC:** \_\_\_\_\_

COMMENTS; Changed throttle body with rebuilt unit, adjusted throttle linkage.



**ADDITIONAL MAINTENANCE**

**DATE: HOURS: MECHANIC : AARON GUSHWA**

**COMMENTS:REPAIR FUEL GAS LEAK AT FLEX HOSE**

**REPLACE WATER PUMP BELTS AND FAN BELTS GREASE ALL FITTINGS**

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.

**PLATFORM GRACE  
GENERATOR SERVICE**

**DATE; 4/5/2007      UNIT; G-3**

**HOURS; 37974**

**MECHANIC: John T. Montgomery, (Monty)**

**1500 HOUR SERVICE**

**REPLACE SPARK PLUGS:** YES X NO \_\_\_  
COMMENTS: \_\_\_\_\_

**CHANGE & CLEAN OIL FILTERS:** YES X NO \_\_\_  
COMMENTS: \_\_\_\_\_

**CHANGE CRANK CASE OIL:** YES X NO \_\_\_  
COMMENTS: \_\_\_\_\_

**REPLACE AIR FILTER:** YES X NO \_\_\_  
COMMENTS: \_\_\_\_\_

**REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS:** YES \_\_\_ NO X  
COMMENTS: Install new element

**3000 HOUR SERVICE**

**ACID CLEAN CATALYST ELEMENT:** YES \_\_\_ NO \_\_\_  
COMMENTS: \_\_\_\_\_

**REPLACE O2 SENSOR** YES \_\_\_ NO \_\_\_  
COMMENTS: \_\_\_\_\_

**ADDITIONAL MAINTENANCE**

**DATE:      HOURS:      MECHANIC:**  
Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.



Ventura County Air Pollution Control District

COMPLIANCE CERTIFICATION PERMIT FORM

Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF47/12-21-98

Emission Unit Description: Waukesha Engine G-03		Pollutant: NO <sub>x</sub>
Measured Emission Rate: 1.3 ppm @ 15% O <sub>2</sub>	Limited Emission Rate: 9 ppm @ 15% O <sub>2</sub>	Specific Source Test or Monitoring Record Citation: ARB Method 100 Test Date: 01/25/08

Emission Unit Description: Waukesha Engine G-03		Pollutant: CO
Measured Emission Rate: 168 ppm @ 15% O <sub>2</sub>	Limited Emission Rate: 1600 ppm @ 15% O <sub>2</sub>	Specific Source Test or Monitoring Record Citation: ARB Method 100 Test Date: 01/25/08

Emission Unit Description: Waukesha Engine G-03		Pollutant: ROC
Measured Emission Rate: <0.5 ppm @ 15% O <sub>2</sub>	Limited Emission Rate: 50 ppm @ 15% O <sub>2</sub>	Specific Source Test or Monitoring Record Citation: EPA Method 18 Test Date: Test Date: 01/25/08

Emission Unit Description:		Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:

Emission Unit Description:		Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation: Test Date:

Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment  
Form TVPF46/12-24-98 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.9N7	Description: Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of operating hours. Date, time, duration, and reason for emergency operation. Records of engine data. Compliance is determined by logged hours of annual operation to ensure less than 50 hours per year.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method is continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

**COMPLIANCE CERTIFICATION PERMIT FORM**

Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/12-24-98 Page 2 of 2

6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.9N8	Description: Stationary diesel-fired internal combustion engines with permitted capacity factor of 15% or less.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records containing data for each engine verifying the manufacturer's specified maximum hourly fuel consumption, data specifying the actual annual usage (e.g., fuel consumption or operating hours), and data for each engine including the engine manufacturer, model no., operator identification no., and location of each engine. A report of the engine's fuel consumption is submitted to the District every 6 months. **See attached rolling 12-month fuel consumption.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.9N9	Description: Stationary diesel-fired internal combustion engines used to power cranes and welding equipment
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records containing data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine. Routine surveillance of the diesel-fired engine to ensure that compliance is being maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 1	Description: Platform Grace Additional Requirements - 12-month rolling records of throughput and consumption as provided in the Permitted Throughput and Consumption Limits Table in Section No. 3 of the Permit.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of tank throughputs for tanks with permitted throughputs, monthly records of fuel consumption for the generators, flares, turbines (removed in September 2000), generators, cranes, boom boats, and crew and supply boats are maintained in 12-month rolling records. In addition, monthly emissions for the crew and supply boats, and wipe cleaning solvents are calculated and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. See **attached 12-Month Rolling data.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."



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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 2	Description: Platform Grace Additional Requirements - Generator G-03 shall only burn natural gas and no other fuel.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine surveillance to ensure only natural gas is used. Annual compliance that only natural gas was burned in G-03.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Y ertura County Air Pollution Control District  
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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 3	Description: Platform Grace Additional Requirements - Maximum number of oil wells (16). Platform Grace currently has 11 oil well completions.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Authority to Construct will be obtained prior to drilling any wells, unless the activity is a redrill. Annual compliance certification that there was no increase in number of wells for this reporting period.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 4	Description: Platform Grace Additional Requirements - Maximum sulfur content of diesel fuel consumed in the crane engines, turbines and C-5B turbine starter engines, Generator G-03, backup generator engine, and the boats.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of certifications from the fuel supplier documenting the sulfur content of each diesel fuel delivery are maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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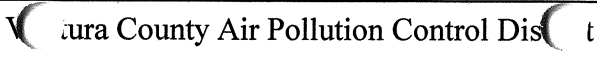
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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 5	Description: Platform Grace Additional Requirements - Crew boat and work boat emission limits
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of fuel consumption from the crew and work boats are maintained. Monthly emissions are calculated for the crew and work boats and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. **See attached 12-month rolling data.**

- Yes  No      Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- Yes  No      During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
- Yes  No      During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”



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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 6 and 7	Description: Platform Grace Additional Requirements - Crew boat and work boat permitted engines
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Only one crew boat and one work boat was used at any given time. Records are maintained showing the days and hours that each crew boat and work boat was in service. Annual compliance certification that these records are maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 3 / 31 / 08 (MM/DD/YY)

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC1 Condition No. 8	Description: Platform Grace Additional Requirements - Solvent Recordkeeping
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of solvent purchase and usage, along with records of solvent that is recycled or disposed of are maintained for solvents used in solvent cleaning activities, including wipe cleaning. Annual compliance certification that these records are maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC2 Condition Nos. 1 and 4	Description: Flare fuel consumption
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Each flare has individual fuel meter installed to record the amount of natural gas consumed. Monthly records of volume of gas combusted in flare are maintained in 12-month rolling records. Records also differentiate between emergency (unplanned) usage and non-emergency (planned) usage. Annual compliance certification that these records are maintained. **See attached 12-month rolling data.**

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC2 Condition Nos. 2 and 3	Description: Flare ignition system operation – each flare is equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Flare's ignition system is tested monthly and monthly records of the flare's ignition system tests and maintenance activities are maintained. Annual compliance certification that these records are maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."



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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC3	Description: Caterpillar Diesel Backup Generator operation. Cannot be fired simultaneously with either turbine, except during startup or shutdown periods not to exceed 1 hour. Can only be operated during maintenance and when the turbines or Generator G-03 cannot be operated due to mechanical malfunction.
--	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that the backup generator G-02 is only operated during maintenance testing or when the G-03 is mechanically malfunctioning. Records indicating reason for usage are maintained. Annual compliance certification that records are maintained. Turbines out of service therefore simultaneous operation was not possible. Turbines were removed from the platform in September of 2000.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC4	Description: Tanks designated as out of service on the permit are shut down and cannot be operated.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that Tanks T-4, T-6, T-10, T-21A, T-21B, T-23, T-25, and T-22 have been shut down and had not been operated during this compliance period.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 71.1.C	Description: Emissions of produced gas must be controlled at all times using a gas collection system that directs all gas to a fuel or sales gas system, or to a flare that combusts ROCs.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fugitive I&M Program under Rule 74.10 for the gas collection system's gas and liquid piping connections; Annual compliance certification that the produced gas collection system is a closed system through a visual inspection. Flare is inspected on a quarterly basis. Records of visual and flare inspections are maintained at the facility.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 71.4.B.1	Description: First stage sump prohibition
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual certification that there are no first stage production sumps at the facility.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”



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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 71.4.B.3	Description: Well cellar storage prohibition
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual certification including routine surveillance and visual inspections that no crude oil or petroleum material was stored in a well cellar except during periods of equipment maintenance or well workover, and in no case, no storage for more than 5 days. No well cellars are on Platform Grace.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.6	Description: Surface cleaning and degreasing requirements including ROC content limits, application and storage requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of current material list of ROC-containing material used in solvent cleaning activities are maintained. Routine surveillance of the applicable solvent cleaning activities is also performed.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.10	Description: Fugitive leak and leak inspection requirements for components at crude oil production and processing facilities.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Weekly visual inspections of pumps, including but not limited to rod pumps and compressor pumps for liquid leaks. Quarterly monitoring of the following components for gaseous leaks using EPA Reference Method 21: valves, packing seals on dump lever arms connected to gas traps, separators, or vessels, hatches on non-vapor recovery tanks, and polished rod stuffing boxes. All other components not exempt are monitored annually. Routine surveillance of the applicable components is also performed and includes verification of proper operation and equipment and inspection requirements are met. Detected leaks are visibly tagged with the date leak is detected, and repaired no later than 21 days (critical components are at next scheduled shutdown, but no later than 3 months). Repair is reinspected within one week of repair. Records of the following are maintained: location, type, description of each leaking component inspected, and name of any operating unit where each leaking component is found; date of leak detection and method of detection; date that leak is repaired and date of re-check; identification of leaks from critical process units; number of components inspected, number and percentage of leaking components found, categorized by groups: hatches, polished rod stuffing boxes, dumplever arms, valves (not open-ended), open-ended lines, flanges (if designated as exempt), other components.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

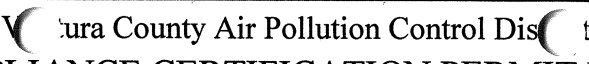
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5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.22	Description: Natural gas-fired, fan-type central furnaces – NO <sub>x</sub> limits and certification requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual certification including a formal survey identifying each furnace, whether it was installed before or after May 31, 1994, and for those installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces. Platform Grace does not have any natural gas-fired, fan-type central furnaces.

- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”



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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.1	Description: Abrasive blasting requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine surveillance including assuring that operation and equipment requirements are being met, and visual inspections to ensure there are no opacity violations of each abrasive blasting operation are performed. Records including date of operation, type of abrasive blasting media used, identity, size, and location of item blasted, whether the operation was conducted inside or outside a permanent building, and CARB certifications for the abrasives used are maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.11.1	Description: Large Water Heaters and Small Boilers
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual certification including a formal survey identifying each large water heater or small boiler, whether it was installed before or after December 31, 1999, or December 31, 2000 and for those installed after December 31, 1999, or December 31, 2000, information indicating that the certification is contained on the unit's nameplate, or that the unit is included on a District-provided list of certified water heaters, boilers, steam generators and process heaters. **Platform Grace does not have any of the applicable units.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

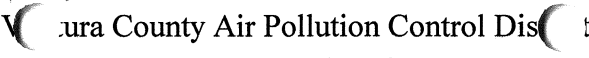
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/12-24-98 Page 2 of 2

6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
 Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 74.2	Description: Architectural coating requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine surveillance and records including specifying the usage of compliant coatings and maintaining VOC records of coatings used (MSDSs are maintained). VOC content of coatings are measured using EPA Method 24, VOC content of exempt organic compounds are measured using CARB Method 432, and acid content of pretreatment wash primers are measured using ASTM Method D 1613-85, and metal content of metallic pigmented coatings are measured using SCAQMD Method 311-91.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment  
Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 40CFR61.M	Description: National emission standard for asbestos
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that compliance with 40 CFR 61 Subpart M is met if an asbestos demolition or renovation activity occurs. None has occurred during this reporting period.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

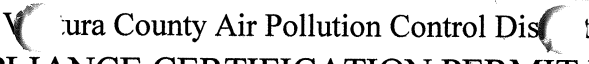


Ventura County Air Pollution Control District  
COMPLIANCE CERTIFICATION PERMIT FORM  
Applicable Requirement or Part 70 Permit Condition Attachment  
Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)


  
**COMPLIANCE CERTIFICATION PERMIT FORM**
  
 Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC5	Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO <sub>x</sub> , ROC, and CO emission limits. CAM Requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual source test of the G-03 generator using the following methods: ARB Method 100 for NO<sub>x</sub>, ARB Method 100 for CO, EPA Method 25 or EPA Method 18 for ROC, ARB Method 100 for oxygen content, and ASTM Method 1826-77 for gaseous fuel heating value. Annual source test also to obtain air to fuel ratio set point. Quarterly monitoring and recordkeeping of set point. **Annual Source Test was previously submitted. Summary of source test data is attached.** Annual compliance certification that daily NO<sub>x</sub> measurements utilizing a portable analyzer are being recorded, Annual source testing to validate portable analyzer measured concentrations. **Daily portable analyzer readings are attached. Source test validation report was previously submitted.**

- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

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5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. (*Form TVPF47 is included with Attachment 74.9N3*)

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)



**PLATFORM GRACE  
773 BHP WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING**

MONTH: MAY

YEAR:2007

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed) CO	Time	Tester's Initials
	Nox	CO						
1	3	183	5:02					JT
2	4	114	8:35					JM
3	3	98	5:12					JM
4	3	108	5:30					JM
5	0	258	5:44					JM
6	4	1005	7:26					JM
7	4	351	4:40					JM
8	3	255	5:25					SM
9	3	1524	6:30					CB
10	3	1201	7:00					CB
11	6	393	9:00					CB
12	4	292	9:45					CB
13	3	427	7:45					CB
14	3	1023	10:20					CB
15	4	363	5:30					JT
16	3	158	9:48					FS/FM
17	4	491	6:54					FS
18	3	717	10:30					FS
19	3	704	8:40					FS
20	3	148	19:58					SM
21	3	157	9:47					FS
22	3	503	4:03					SM
23	3	625	7:45					CB
24	3	909	9:47					CB
25	6	279	6:25					CB
26	3	1062	9:24					CB
27	5	611	8:00	Roller on printer is sticking				CB
28	3	1097	8:04					CB
29	0	177	4:33					JT
30	3	325	7:00					FS
31	5	481	5:39					FS



**PLATFORM GRACE  
773 BHP WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING**

MONTH: JULY

YEAR: 2007

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1	0	145	16:13					FM/FEB
2	6	136	6:36					F.M
3	4	114	4:44					F.S
4	4	412	6:25					J.T
5	8	1288	11:47					L.M
6	0	291	7:08					J.T/L.M
7	3	1210	8:28					J.T
8	2	557	7:49					L.M
9	2	261	7:09					J.T
10	2	164	6:36					C.B
11	2	301	6:23					S.M
12	2	250	8:14					FM
13	2	126	5:46					FB
14	2	754	6:00					FM
15	2	160	6:00					FB
16	1	152	6:30					F.M
17	4	535	12:57					LM
18	2	509	7:18					JT
19	2	531	7:19					JT
20	2	266	7:20					JT
21	3	806	6:22					JT
22	3	628	6:18					JT
23	2	308	6:26					JT
24	2	887	5:54					CB
25	2	161	6:30					FM
26	2	1342	11:50	took reading @11:50 got called off job hit print @12:09 on 7-27-07				SM.
27				OUT OF SERVICE				
28				OUT OF SERVICE				
29				OUT OF SERVICE				
30				OUT OF SERVICE				
31				OUT OF SERVICE				

**PLATFORM GRACE  
773 BHP WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING**

MONTH: AUGUST

YEAR: 2007

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed) CO	Time	Tester's Initials
Day	Nox						
1			OUT OF SERVICE				
2			OUT OF SERVICE				
3			OUT OF SERVICE				
4	4	584	17:56	G-3 BACK ON @ 14:32hrs			LM
5	2		7:49				JT
6	2		8:06				JT
7	3	134	8:13				CB
8	3	504	5:15				SM
9	4	470	0:00				SM
10				OUT OF SERVICE			
11							
12							
13							
14							
15							
16							
17							
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29							
30							
31							





**PLATFORM GRACE  
773 BHP WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING**

MONTH: OCTOBER

YEAR: 2007

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				NOT IN USE				
2				NOT IN USE				
3				NOT IN USE				
4				NOT IN USE				
5				NOT IN USE				
6				NOT IN USE				
7				NOT IN USE				
8				NOT IN USE				
9				NOT IN USE				
10				NOT IN USE				
11				NOT IN USE				
12				NOT IN USE				
13				NOT IN USE				
14				NOT IN USE				
15				NOT IN USE				
16				NOT IN USE				
17				NOT IN USE				
18				NOT IN USE				
19				NOT IN USE				
20				NOT IN USE				
21				NOT IN USE				
22				NOT IN USE				
23				NOT IN USE				
24				NOT IN USE				
25				NOT IN USE				
26				NOT IN USE				
27				NOT IN USE				
28				NOT IN USE				
29				NOT IN USE				
30				NOT IN USE				
31				NOT IN USE				



PLATFORM GRACE  
773 BHP WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING

MONTH: DECEMBER

YEAR: 2007

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed) CO	Time	Tester's Initials
	Nox	CO						
1	8.3	346	7:21					MR
2	8.8	1420	7:26					MR
3	8.1	912	7:46					MR
4	8.1	1297	8:53					MR
5	6.2	1148	8:40					AG
6	5.8	828	16:50					AG
7	9	40	7:24					AG
8	7.6	187	8:21					AG
9	7.5	606	8:44					AG
10	7.8	1136	16:11					AG
11	7.5	879	7:03					A.G.
12	3.8	502	8:01					MR
13	7.2	929	7:04					MR
14	6.8	327	7:15					MR
15	7.1	559	6:49					MR
16	6.1	1163	7:49					MR
17	6.8	1311	7:05					MR
18	8.2	1176	8:05					MR
19	9	1183	10:36					AG
20	7.8	1032	6:31					AG
21	8.4	1518	6:21					AG
22	8.6	1162	6:30					AG
23	1.6	950	12:28					AG
24	5.4	939	6:30					AG
25	8.5	1395	8:06					AG
26	8.5	1452	7:17					AG
27	3.7	1288	7:40					DG
28	3.3	1437	7:29					DG
29	3	1490	1:43					DJ
30	2.8	1316	2:55					DJ
31	3.9	1565	1:30					DJ

PLATFORM GRACE  
773 WAUKESHA GENERATOR ENGINE (G-03)  
DAILY CAM/RULE 74.9 MONITORING

Month: Jan Year: 2008

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed) CO	Time	Tester's Initials
	Nox	CO						
1	5.7	995	2:28					DJ
2	8.2	1399	6:41					DJ
3	7.6	989						AG
4	8	448	18:05					AG
5				DOWN FOR MAINTENANCE				
6				DOWN FOR MAINTENANCE				
7				DOWN FOR MAINTENANCE				
8				DOWN FOR MAINTENANCE				
9	8	112	8:10					DJ
10	8.3	297	6:28					DJ
11	8.8	574	9:44					DJ
12	8.4	883	7:44					DJ
13	8.7	374	7:22					DJ
14	8.3	808	6:59					DJ
15	8.8	653	7:48					DJ
16				DOWN FOR MAINTENANCE NEW HEADS				
17				DOWN FOR MAINTENANCE				
18				DOWN FOR MAINTENANCE				
19	8.6	751	11:00					LM
20	2	496	8:08					LM
21	8	1260	11:02					LM
22	7.7	240	15:03					AG
23	0.9	821	7:30					FM
24	4.9	824	6:01					FM
25	4.4	526	5:43	SOURCE TESTED				FM
26	7.8	907	6:11					FM
27	7.1	242	5:11					FM
28	8.9	801	7:09					FB
29	4.8	71	12:12					LM
30	5.6	196	9:11					LM
31	7.4	902	13:08					LM



**PLATFORM GRACE**  
**773 WAUKESHA GENERATOR ENGINE (G-03)**  
**DAILY CAM/RULE 74.9 MONITORING**

Month: MARCH Year: 2008

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Initial Reading (ppmv @ 15%O2)			Time	Corrective Actions Taken (In the event that initial test result is greater than 9 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	Nox	CO				CO	Time	
1				Portable Analyzer being repaired				
2	10.6	80	9:08	Portable Analyzer being repaired	4	148	5:19	SM
3	4	148	5:19					SM
4	6.5	305	19:43					JT
5	4.2	624	18:43					JT/WC
6	7.4	1102	21:03					JT
7	3.3	551	18:40					WC
8	6.4	488	19:33					JT
9	8	1470	15:30					WC
10	5.4	298	21:22					JT
11	2	648	4:31					JT
12	5.3	721	5:29					FB
13	5	738	5:31					FB
14	5.5	1398	5:54					FB
15	4.1	1270	5:44					FB
16	5.9	1561	5:20					FB
17	3.6	71	5:26					FB
18	3.9	345	15:26					JT/CB
19	4.4	1589	6:00					CB
20	3.8	1489	6:00					CB
21	6.6	1475	16:19					CB
22	6	633	6:00					CB
23	3.1	1444	6:12					CB
24	8	1355	6:09					CB
25	7.7	1145	0:00					FB
26	7.7	1107	5:49					FB
27	8.7	1377	5:51					FB
28	8.6	1272	6:09					FB
29	7.4	1545	5:49					FB
30	7.2	177	5:29					FB
31	7.6	979	5:27					FB

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC6	Description: Crane fuel consumption
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of crane fuel consumption are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. **See attached rolling 12-month data.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”



**COMPLIANCE CERTIFICATION PERMIT FORM**

Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

Vera County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: PO1493PC7	Description: Both turbines designated as out of service on the permit are shut down and cannot be operated.
--	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that Turbines G-1B and G-1C have been shut down and had not been operated during this compliance period. The turbines were removed in September of 2000.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
Applicable Requirement or Part 70 Permit Condition Attachment  
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

04 / 01 / 07 (MM/DD/YY) to 03 / 31 / 08 (MM/DD/YY)

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 50	Description: Opacity requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine surveillance and visual inspections are performed to ensure that opacity requirements are being maintained. Records including date, time, and identity of emissions unit of any occurrences of visible emissions not meeting Rule 50 opacity requirements are maintained. District notification within subsequent 24 hours if visible emissions problem cannot be corrected within first 24 hours.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 52	Description: Particulate Matter – Concentration requirements (grain loading)
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that particulate matter was not discharged into the atmosphere from any source at the facility in excess of the concentration listed in the table shown in Rule 52. This is based on a reference to the District analysis of Rule 52 compliance based on EPA emission factors as being sufficient. Periodic monitoring is not necessary to certify compliance.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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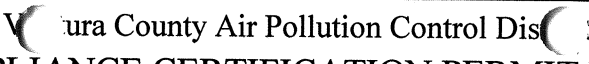
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 54.B.1 (OCS)	Description: Sulfur Compounds – Sulfur emission concentration requirements at point of discharge
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of each flaring event are maintained. Unplanned flaring event reports are provided to the District within one week if they exceed 24 hours. No unplanned flaring events exceeding 24 hours occurred at Platform Grace during this reporting period. The District is notified 72 hours prior to planned flaring. Records of planned flaring is maintained and includes the date, time, duration, flare volume, and estimated sulfur emissions during the entire event. A representative fuel analysis is being maintained.

- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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6.  Yes  No      During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach-a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 54.B.2 (OCS)	Description: Sulfur Compounds – Sulfur emission concentration requirements at ground level
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of each flaring event are maintained. Unplanned flaring event reports are provided to the District within one week if they exceed 24 hours. No unplanned flaring events exceeding 24 hours occurred at Platform Grace during this reporting period. The District is notified 72 hours prior to planned flaring. Records of planned flaring is maintained and includes the date, time, duration, flare volume, and estimated sulfur emissions during the entire event. A representative fuel analysis is being maintained.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 57.B	Description: Combustion contaminants requirements – Specific – Fuel burning equipment
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that combustion contaminants were not discharged into the atmosphere from any fuel-burning equipment at the facility in excess of the concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12% CO<sub>2</sub> at standard conditions. This is based on a reference to the District analysis of Rule 57.B compliance based on EPA emission factors and a representative source test as being sufficient. Periodic monitoring is not necessary to certify compliance.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”


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6.  Yes  No      During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 64.B.1	Description: Gaseous fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting gaseous fuel.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

**Annual fuel analysis of the total sulfur content measured as hydrogen sulfide.**

- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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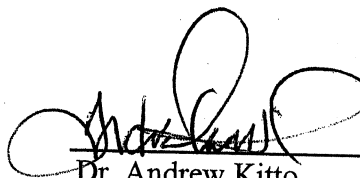


<b>CLIENT</b>	<b>OEC</b>
<b>PROJECT NAME:</b>	<b>Annual Samples</b>
<b>LABORATORY NO:</b>	<b>08-041</b>
<b>SAMPLING DATE:</b>	<b>January 11, 2008</b>
<b>RECEIVING DATE:</b>	<b>January 12, 2008</b>
<b>ANALYSIS DATE:</b>	<b>January 12, 2008</b>
<b>REPORT DATE:</b>	<b>January 15, 2008</b>

**Laboratory Analysis Report**

<b>Analysis Method</b>	<b>SCAQMD 307-91</b>				
<b>Detection Limits</b>	<b>0.1 PPMV</b>				
<b>Analyte</b>	<b>Client ID</b>	<b>Plt Gail Fuel Gas</b>	<b>Plt Gail Fuel Gas Dup</b>	<b>Plt Grace Fuel Gas</b>	<b>Plt Grace Fuel Gas Dup</b>
	<b>Sampling Date</b>	1/11/2008	1/11/2008	1/11/2008	1/11/2008
	<b>Sampling Time</b>	0840	0840	0920	0920
	<b>Lab ID</b>	01208-1	01208-2	01208-3	01208-4
	<b>Units</b>	<b>PPMV</b>	<b>PPMV</b>	<b>PPMV</b>	<b>PPMV</b>
	<b>Hydrogen Sulfide</b>	0.3	0.2	0.6	0.5
<b>Carbonyl Sulfide</b>	6.4	5.7	<0.1	<0.1	
<b>Methyl Mercaptan</b>	1.3	1.0	<0.1	<0.1	
<b>Ethyl Mercaptan</b>	0.7	0.5	<0.1	<0.1	
<b>Un-Identified S Compounds</b>	2.7	2.7	0.1	<0.1	
<b>TRS as H<sub>2</sub>S</b>	<b>11.4</b>	<b>10.0</b>	<b>0.7</b>	<b>0.5</b>	

TRS: Total Reduced Sulfur as Hydrogen Sulfide


  
 Dr. Andrew Kitto  
 President

Vera County Air Pollution Control District  
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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 64.B.2	Description: Solid or liquid fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting solid or liquid fuel.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

**Fuel supplier's certifications containing fuel sulfur content by weight for each fuel delivery are maintained.**

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
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GENERAL PETROLEUM

04/15/08

## Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and  
Delivered to VENOCO PLATFORM GAIL AND GRACE FROM 1/1/07-  
12/31/07

was in compliance with South Coast Air Quality Management District

Requirements for Santa Barbara, Ventura and Los Angeles Counties.

The test Results meet ASTM D-4294 and is typical of all CARB Ultra Low Sulfur  
Dyed Diesel Fuel sold by General Petroleum. The sulfur content is Guaranteed to  
be less than .0015%. (15PPM) The high heat content is typically in the 19,950 to  
20,200 BTU per pound range.

*Hope Bowles*

General Manager  
General Petroleum  
Oxnard Division  
Office (805) 299-1219

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: 68	Description: Carbon Monoxide concentration requirements for external combustion equipment
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification that carbon monoxide (CO) was not discharged into the atmosphere from any natural gas-fired or fuel oil-fired external combustion equipment at the facility in excess of 2000 ppmv measured on a dry basis at standard conditions. This is based on a reference to the District analysis of Rule 68 compliance based on EPA emission factors as being sufficient. Periodic monitoring is not necessary to certify compliance.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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6.  Yes  No      During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
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