



February 14, 2011

Mr. Keith Duval  
Ventura County APCD  
669 County Square Drive  
Ventura, CA 93003

**Subject: Annual Compliance Certification Report  
Platform Gilda, PTO 1492**

Dear Mr. Duval:

DCOR, LLC, submits the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 01492. This report covers the time period of January 1, 2010 to December 31, 2010.

Please do not hesitate to contact me at 805-535-2074 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Christine White".

Christine White  
Environmental Advisor

Enclosure

C: Mr. Gerardo Rios  
USEPA, Region 9  
75 Hawthorne Street  
Mail Code: AIR-3  
San Francisco, CA 94105

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**DCOR, LLC**

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**2010 ANNUAL COMPLIANCE  
CERTIFICATION REPORT**

**PLATFORM GILDA**

**PART 70  
PERMIT TO OPERATE 1492**

**Submitted to:**

**Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003**

**Submitted by:**

**DCOR, LLC  
290 Maple Court, Suite 290  
Ventura, CA 93003**

**DCOR, LLC – PLATFORM GILDA – PTO 1492**

**2010**

**COMPLIANCE VERIFICATION REPORT**

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**SECTION 1**  
**Compliance Certification**

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Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
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: Tina Wiegman, ES&RC Manager	Date: 2/10/2011
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Time Period Covered by Compliance Certification <u>01</u> / <u>01</u> / <u>2010</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2010</u> (MM/DD/YY)
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## 1.C. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1. - Specific Applicable Requirements
- Table 1.c.2. - Permit-Specific Conditions
- Table 1.c.3. - General Applicable Requirements
- Table 1.c.4. - General Requirements for Short-Term Activities

### 1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> <li>•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable</li> <li>•Verbal notice of maintenance activities</li> <li>•Rule 74.10 inspections</li> <li>•Annual compliance certification including verification that tanks are equipped with a vapor recovery system</li> </ul>	<ul style="list-style-type: none"> <li>•Records of quarterly inspections and tank maintenance activities</li> <li>•Rule 74.10 records</li> </ul>	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> <li>•Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve</li> <li>•Rule 74.10 inspections</li> </ul>	<ul style="list-style-type: none"> <li>•Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery</li> <li>•Records to show integrity of roof and PV valves for tanks not permanently located at facility</li> <li>•Rule 74.10 records</li> </ul>	None	None	

**1.c.1. Specific Applicable Requirements (Continued)**

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 NI	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> <li>Verbal notice of maintenance operations</li> <li>Rule 74.10 inspections</li> <li>Annual compliance certification including verifying the integrity of the cover</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance</li> <li>Rule 74.10 records</li> </ul>	None	None	
74.9N7	Rule 74.9.D.3	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>Records of operating hours</li> <li>Date, time, duration, and reason for emergency operation</li> <li>Records of engine data</li> </ul>	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only</li> </ul>	<ul style="list-style-type: none"> <li>Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location</li> </ul>	None	None	
74.15.1NI	Rule 74.15.1.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Biennial Source Test (NO<sub>x</sub>, CO)</li> <li>Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters</li> </ul>	<ul style="list-style-type: none"> <li>Records of source tests</li> <li>Daily records of alternate fuel consumption</li> </ul>	None	<ul style="list-style-type: none"> <li>NO<sub>x</sub>-ARB Method 100</li> <li>CO-ARB Method 100</li> </ul>	

### 1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> <li>Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery</li> <li>Annual compliance certification</li> </ul>	Fuel records	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> <li>Diesel fuel consumption for boats servicing Platforms Gina and Gilda</li> <li>Monthly calculations of emissions (boats)</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption</li> <li>Monthly calculations of emissions (boats)</li> </ul>	None	None	
PO1492PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> </ul>	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> </ul>	None	None	
PO1492PC1 - Condition No. 8	Rule 26 Boom Boat Fuel Limit	<ul style="list-style-type: none"> <li>Gasoline consumption at Boom Boats</li> <li>Monthly gasoline consumption records</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly gasoline consumption</li> </ul>	None	None	
PO1492PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1492PC2 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> <li>Fuel consumption</li> <li>Identify emergency vs. non-emergency usage</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of fuel consumption</li> </ul>	None	None	
PO1492PC2 - Condition Nos. 2 and 3	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <li>Monthly tests of flare's ignition system</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of ignition system</li> <li>Maintenance records</li> </ul>	None	None	



**1.e.2. Permit-Specific Conditions (continued)**

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Monthly records of backup utility generator hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use</li> <li>•Monthly and twelve month rolling records of hours of operation</li> <li>•Monthly fuel consumption</li> </ul>	None	None	
PO1492PC3 - Condition No. 2	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Recordkeeping</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter)</li> <li>•Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	

### 1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> <li>• Routine surveillance</li> <li>• Annual compliance certification, including a formal survey</li> <li>• Opacity readings upon request</li> <li>• Notification required for uncorrectable visible emissions</li> </ul>	<ul style="list-style-type: none"> <li>• All occurrences of visible emissions for periods &gt; 3min in any one hour</li> <li>• Annual formal survey of all emissions units</li> </ul>	None	<ul style="list-style-type: none"> <li>• Opacity - EPA Method 9</li> </ul>	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Upon request, source test for sulfur compounds at point of discharge</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate</li> </ul>	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Determine ground or sea level concentrations of SO<sub>2</sub> upon request</li> <li>• Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• SO<sub>2</sub> - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H<sub>2</sub>S and SO<sub>2</sub></li> </ul>	
57.1	Rule 57.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> </ul>	None	None	None	<ul style="list-style-type: none"> <li>• Not required based on District analysis</li> </ul>
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• None for PUC-quality gas</li> <li>• Annual test for non PUC-quality gas (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Annual fuel gas analysis for non PUC-quality gas</li> </ul>	None	<ul style="list-style-type: none"> <li>• SCAQMD Method 307-94</li> </ul>	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel supplier's certification, or fuel test per each delivery</li> </ul>	None	<ul style="list-style-type: none"> <li>• ASTM Method D4294-83 or D2622-87</li> </ul>	

**1.c.3. General Applicable Requirements (Continued)**

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1.C	Rules 71.1.C and 74.10	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Rule 74.10 inspections</li> <li>Visual inspection to ensure collection system is closed</li> <li>Quarterly inspection of flare to ensure proper operation</li> </ul>	<ul style="list-style-type: none"> <li>Records of inspections of flare</li> <li>Rule 74.10 records</li> </ul>	None	None	<ul style="list-style-type: none"> <li>Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements</li> </ul>
71.4.B.1	Rule 71.4.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification to ensure there are no first stage sumps</li> </ul>	None	None	None	
71.4.B.3	Rule 71.4.B.3	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance and visual inspections of well cellars</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance or well workover activity during periods of crude oil storage</li> </ul>	None	None	
74.6	Rule 74.6	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain current solvent information</li> <li>Routine surveillance of solvent cleaning activities</li> <li>Upon request, solvent testing</li> </ul>	<ul style="list-style-type: none"> <li>Records of current solvent information</li> </ul>	None	<ul style="list-style-type: none"> <li>ROC content-EPA Test Method 24 or 24A</li> <li>Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85</li> <li>True vapor pressure or composite partial pressure -ASTM D2879-86</li> <li>Initial boiling point-ASTM 1078-78 or published source</li> <li>Spray gun</li> <li>active/passive solvent losses-SCAQMD Method (10-3-89)</li> </ul>	

**1.c.3. General Applicable Requirements (Continued)**

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.10	Rule 74.10	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Identify leaking components</li> <li>•Inspections every shift or 8 hours at natural gas processing plants</li> <li>•Daily and/or weekly inspections for specified equipment</li> <li>•Quarterly inspections for specified components</li> <li>•Pressure relief valve inspections</li> <li>•Annual update to Operator Management Plan</li> <li>•Notification of major leaks in critical components</li> <li>•Notification of repeat leaks</li> </ul>	<ul style="list-style-type: none"> <li>•Records of leak inspections in inspection log</li> </ul>	None	<ul style="list-style-type: none"> <li>•Gas Leaks - EPA Method 21</li> <li>•ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85</li> <li>•Weight percentage of evaporated compounds of liquids -- ASTM Method D 86-82</li> <li>•API Gravity - ASTM Method D287</li> </ul>	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Maintain identification records of large water heaters and small boilers</li> </ul>	<ul style="list-style-type: none"> <li>•Records of current information of large water heaters and small boilers</li> </ul>	None	None	<ul style="list-style-type: none"> <li>•Rule only applies to future installation of large water heaters and small boilers</li> </ul>
74.22	Rule 74.22	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Maintain furnace identification records</li> </ul>	<ul style="list-style-type: none"> <li>•Records of current furnace information</li> </ul>	None	None	<ul style="list-style-type: none"> <li>•Rule only applies to future installation of natural gas-fired, fan-type furnaces</li> </ul>

### 1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance and visual inspections of abrasive blasting operation</li> <li>Abrasive blasting records</li> </ul>	<ul style="list-style-type: none"> <li>Abrasive blasting records</li> </ul>	None	<ul style="list-style-type: none"> <li>Visible emission evaluation-Section 92400 of CCR</li> </ul>	
74.2	Rule 74.2	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance</li> <li>Maintain VOC records of coatings used</li> </ul>	<ul style="list-style-type: none"> <li>Maintain VOC records of coatings used</li> </ul>	None	<ul style="list-style-type: none"> <li>VOC content-EPA Method 24, CARB Method 432</li> <li>Acid content-ASTM Method D 1613-85,</li> <li>Metal content-SCAQMD Method 311-91</li> </ul>	
74.16	Rule 74.16	<ul style="list-style-type: none"> <li>Annual compliance certification to ensure grid power being used, and/or</li> <li>Annual compliance certification to ensure drilling engine has a valid APCD Permit to Operate, and meets NOx limit, or</li> <li>Maintain cost analysis documentation as verification to grid power exemption, if applicable</li> <li>Annual source tests (NO<sub>x</sub>) or engine manufacturer certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of source tests or engine manufacturer certification</li> <li>Records of cost analysis documentation</li> </ul>	None	<ul style="list-style-type: none"> <li>NO<sub>x</sub>-ARB Method 100</li> </ul>	

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## **SECTION 2**

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### **Breakdowns, Deviations, and Excess Emissions**

**PTO 1492: Platform Gilda**

Reporting Period: January 1, 2010 through December 31, 2010

There were four breakdowns filed during this reporting period, as summarized on the following Annual Compliance Certification Deviation Summary Forms.

There were no excess emissions.



**ANNUAL COMPLIANCE CERTIFICATION  
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>5/18/2010</u> <u>4:46</u></p> <p>End <u>5/18/2010</u> <u>4:46</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>5/18/2010</u> <u>4:46</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation</p> <p>Loss of electrical power to facility due to SCE service flicker.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>6/30/2010</u> <u>6:20</u></p> <p>End <u>6/30/2010</u> <u>10:00</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>6/30/2010</u> <u>6:20</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation</p> <p>Main breaker to all DCOR Ventura facilities failed when So Cal Edison restored power after planned shutdown.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. The main breaker was repaired. All production was shut in and there was no venting; therefore, no excess emissions.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>10/19/2010</u> <u>18:05</u></p> <p>End <u>10/19/2010</u> <u>18:30</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>10/19/2010</u> <u>18:05</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation</p> <p>Loss of electrical power to facility due to SCE service flicker.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.</p>





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>12/13/2010</u> <u>10:22</u></p> <p>End <u>12/13/2010</u> <u>10:35</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>12/13/2010</u> <u>10:22</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation</p> <p>Loss of electrical power to facility due to SCE service flicker.</p>	<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.</p>	

## **SECTION 3**

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### **Specific Applicable Requirements**



**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1N1</b></p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Daily visual inspections verifying that the vapor recovery is operational on the tanks. Quarterly inspections per Rule 74.10 and EPA Method 21 ensuring that the hatches do not leak.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1N6</b></p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Crude Oil Production and Separation, Compliance with Vapor Recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Daily visual inspections verifying that the integrity of the roofs and pressure relief valves on the portable tanks. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak. The VRU is a closed system.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>Attachment 71.4N1</b></p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Quarterly inspections verifying the integrity of covers and/or roofs on sumps. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION  
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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
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<p>A. Attachment # or Permit Condition #: <b>Attachment 74.9N7</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Attachment 74.9N9</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Attachment 74.15.1N1</b></p>	<p>D. Frequency of monitoring: Daily records of fuel use.</p>
<p>B. Description  Boilers, Steam Generators, and Process Heaters</p>	<p>Biennial source test  E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  ARB Method 100 (NOx and CO)</p>
<p>C. Method of monitoring:  Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION  
SOURCE TEST SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

A. Emission Unit Description:  4.0 MMBtu/hr Process Heater			B. Pollutant  NOx
C. Measured Emission Rate  18 ppm @ 3% O2	D. Limited Emission Rate  30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation  ARB Method 100	F. Test Date  1/28/2009

A. Emission Unit Description:  4.0 MMBtu/hr Process Heater			B. Pollutant  CO
C. Measured Emission Rate  232 ppm @ 3% O2	D. Limited Emission Rate  400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation  ARB Method 100	F. Test Date  1/28/2009

A. Emission Unit Description:  4.0 MMBtu/hr Process Heater			B. Pollutant  NOx
C. Measured Emission Rate  25.2 ppm @ 3% O2	D. Limited Emission Rate  30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation  Burner Emission Test	F. Test Date  5/7/2010

A. Emission Unit Description:  4.0 MMBtu/hr Process Heater			B. Pollutant  CO
C. Measured Emission Rate  65.4 ppm @ 3% O2	D. Limited Emission Rate  400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation  Burner Emission Test	F. Test Date  5/7/2010

A. Emission Unit Description:			B. Pollutant
C. Measured Emission Rate	D. Limited Emission Rate	E. Specific Source Test or Monitoring Record Citation	F. Test Date

**SECTION 4**

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**Permit Specific Conditions**



**ANNUAL COMPLIANCE CERTIFICATION  
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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 1</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Monthly Records of Throughput and Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records maintained for platform throughput, equipment hours of operations, and fuel consumption.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 2</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Maximum Number of Oil Wells: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 48 slots with oilwell completions. Annual Compliance Certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 3</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Well Operations: BACT Requirements: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Annual Compliance Certification verifying that the wells S-89 (slot 6), S-87 (slot 28) and S-28 (slot 58) are free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 4</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Maximum Sulfur Content of Diesel Fuel: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Records of sulfur content of diesel fuel maintained from fuel supplier.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 5</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Crew and Work Boat Emission Limits: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Daily records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 1 Item 6</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Two Crew Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>





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<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 1 Item 7</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Two Work Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Log book maintained confirming work boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 8</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description  Boom Boat Fuel Limit: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Monthly records maintained of fuel consumption at boom boats. Annual compliance certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 9</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description  Solvent Recordkeeping: Rule 23 and Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 2 Section 1 &amp; 4</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description  Flare Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 2 Sections 2 &amp; 3</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description  Flare Ignition System: Rule 71.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Flare has continuous pilot fed by sweet gas.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 3 Sections 1 and 2</b></p>	<p>D. Frequency of monitoring: Monthly and 12-Month Rolling Average</p>
<p>B. Description  New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Non-resettable hour meters are installed on the back-up utility generator. Logs are maintained of the daily usage. The engine is used less than 200 hours per calendar year and less than 50 hours during routine maintenance and the therefore exempt from Rule 74.9 Section D.2 and D.3.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

## **SECTION 5**

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### **General Applicable Requirements**



**ANNUAL COMPLIANCE CERTIFICATION  
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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 50</b></p>	<p>D. Frequency of monitoring: Annual Method 9 Visible Emission Evaluation</p>
<p>B. Description  Visible Emissions - Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 54.B.1</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Sulfur Compounds - SOx at Point of Discharge</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B or SCAQMD 307-94.</p>
<p>C. Method of monitoring:  Record all flare events that exceed one hour or are sour. Source testing upon request.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>54.B.2</b></p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description  Sulfur Compounds - SOx at or Beyond Property Line</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: BAAQMD Ground Level Monitoring for H2S and SO2</p>
<p>C. Method of monitoring:  Record all flare events that exceed one hour or are sour. Source testing upon request.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 57.1</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Combustion Contaminants, Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Calculations based on Ventura County APCD approved methods</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 64.B1</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Sulfur Content of Fuels (Gaseous)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 64.B2</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Sulfur Content of Fuels (Liquid)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Records are maintained from diesel fuel supplier certifying the sulfur content of fuel used for the project.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1.C</b></p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description <b>Crude Oil Production and Separation</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>Y</u> *Deviation Summary Form in Report Section #2</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 71.4.B1</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description <b>Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no first stage sumps on Platform Gilda. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 71.4.B3</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description <b>Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no well cellars on Platform Gilda. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION  
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Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.6</b></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-5 has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>Rule 74.10</b></p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Fugitive Emissions - Oilfields</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <b>Rule 74.11.1</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Platform Gilda has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000 BTU/hr.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.22</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Natural Gas Fired Fan - Central Furnaces</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  There are no natural gas fired fan-type furnaces on the platform. Platform Gilda is not subject to this requirement.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



## **SECTION 6**

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**General Requirements for Short-Term Activities**  
**General Permit Conditions**  
**Miscellaneous Federal Program Conditions**



**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.1</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Visible emission evaluation during abrasive blasting operations. Use of California Certified abrasive sands.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 74.2</b></p>	<p>D. Frequency of monitoring: Monthly Records, Annual Compliance Certification</p>
<p>B. Description  Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Maintain records of all architectural coatings used. Calculate ROC content in grams per liter in accordance to Table of Standards in Rule 74.2. Maintain records of products used, MSDS and or product data sheets.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 74.16</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  Oilfield Drilling Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  All drilling operations powered by grid power, or have exemption from grid power.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Part 70 General</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  General Part 70 Permit Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>PO General</b></p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description  General Permit to Operate Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A</p>
<p>C. Method of monitoring:  Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/10 to 01/31/10  
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: <b>40 CFR Part 55</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Outer Continental Shelf Air Regulations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1492	F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: <b>40 CFR Part 68</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Accidental Release Prevention and Risk Management Plans	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1492	F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: <b>40 CFR Part 82</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Protection of Stratospheric Ozone	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1492	F. Currently in compliance? (Y or N) <u>Y</u>  G. Compliance Status? (C or I) <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form

**SECTION 7**

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**Supporting Documentation**

**AEROS ENVIRONMENTAL, INC.**

**Summary Of Results**

**DCOR, LLC  
Platform Gilda  
4.0 MMBtu/hr Process Heater**

**Project 092-6276  
January 28, 2009  
Permit No. 1492**

Pollutant	ppm	ppm @ 3% O <sub>2</sub>	lb/hr	lb/MMBtu	Permit Limits
NOx	20.8	19.4	0.04	0.0233	0.14 lb/hr and 30 ppm @ 3% O <sub>2</sub>
	19.5	18.0	0.03	0.0217	
	19.8	17.8	0.04	0.0214	
Mean	20.0	18.4	0.04	0.0221	
CO	235	219	0.24	0.1600	0.32 lb/hr and 400 ppm @ 3% O <sub>2</sub>
	240	222	0.25	0.1623	
	282	254	0.30	0.1855	
Mean	252	232	0.26	0.1693	
Comments: _____					



## GAS FIRED BURNER EMISSION TEST

Prepared for:



Dos Cuadras Offshore Resources

PLATFORM GILDA

DATE: 5/7/2010

EQUIPMENT TYPE: Uniflux Heater  
MODEL NUMBER: Mobiltherm 600  
SERIAL NUMBER: 4302  
FGR OUTPUT VALUE: 66%  
HEAT MEDIUM SP 270

FUEL: Natural Gas  
FUEL USE: 40 MCFD  
REGULATOR PRES. 4.50 LBS  
STACK TEMP. 815 F  
TESTED BY: Kirk Cormany

### EMISSION DATA

#### RAW DATA

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE
O2	4.7	4.4	5.5	5.8	5.1
NOx	22	25	21	21	22.3
CO	33	32	78	84	56.8

#### CORRECTED TO 3% O2

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE	LIMITS
O2	4.7	4.4	5.5	5.8	5.1	N/A
*NOx	24	27	24	25	25.2	30
*CO	36	35	91	100	65.4	400

\*Corrected figures are rounded.

#### COMMENTS:

Unit was found to be operating within limits. No adjustments were made.  
Unit fuel gas chart indicated a steady firing rate.

PLATFORM GILDA  
 EMERGENCY STANDBY GENERATOR  
 325 bhp Diesel Engine, Caterpillar 3406

	HOURS	
	Non-Emergency	Emergency
Jan-10	1.0	
Feb-10	0.8	
Mar-10	0.7	
Apr-10	4.7	
May-10	1.2	
Jun-10	0.0	36.6
Jul-10	1.2	
Aug-10	1.7	
Sep-10	1.4	
Oct-10	1.3	
Nov-10	1.2	
Dec-10	0.8	
<b>Total</b>	<b>16.0</b>	<b>36.6</b>

HOURS	
Monthly Total	Annual Total
1.0	1.0
0.8	1.8
0.7	2.5
4.7	7.2
1.2	8.4
36.6	45.0
1.2	46.2
1.7	47.9
1.4	49.3
1.3	50.6
1.2	51.8
0.8	52.6



# PLATFORM GILDA DIESEL CRANES FUEL USAGE

Supporting Documentation  
PC 1, #1

GILDA	NORTH CRANE		
	325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-09	49	686	14980
Feb-09	34	476	14770
Mar-09	13	182	13846
Apr-09	12	168	12012
May-09	203	2842	14266
Jun-09	22	308	11872
Jul-09	15	210	9240
Aug-09	12	168	8512
Sep-09	8	112	7728
Oct-09	10	140	6468
Nov-09	9	126	5908
Dec-09	11	154	5572
Jan-10	8	77	4963
Feb-10	54	356	4843
Mar-10	90	598	5259
Apr-10	87	568	5659
May-10	126	881	3698
Jun-10	38	286	3676
Jul-10	6	46	3512
Aug-10	17	124	3468
Sep-10	13	98	3454
Oct-10	11	77	3391
Nov-10	12	80	3345
Dec-10	15	112	3303
North Crane permit limits		19,250 gal/yr	

GILDA	SOUTH CRANE		
	325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-09	163	2282	18018
Feb-09	58	812	17794
Mar-09	18	252	17094
Apr-09	49	686	16926
May-09	79	1106	17472
Jun-09	14	196	16814
Jul-09	14	196	16296
Aug-09	12	168	14042
Sep-09	11	154	11900
Oct-09	9	126	10346
Nov-09	9	126	8246
Dec-09	11	154	6258
Jan-10	5	57	4033
Feb-10	60	383	3604
Mar-10	161	944	4296
Apr-10	71	452	4062
May-10	86	605	3561
Jun-10	37	241	3606
Jul-10	13	81	3491
Aug-10	27	150	3473
Sep-10	18	121	3440
Oct-10	19	107	3421
Nov-10	19	109	3403
Dec-10	18	115	3364
South Crane permit limits		17,200 gal/yr	

DIESEL CRANES FUEL USAGE - PLATFORM GILDA  
 Fuel meters installed January 2010. Prior to this using  
 conversion factor hr to gal = 14 gal/hr

PLATFORM GILDA  
UNIFLUX HEATER  
4.00 MMBtu/hr, Natural Gas Uniflux Lo-Nox

	Usage		12 Mo 'Rolling' Total
	Natural gas		Natural gas
	mcf	mmscf	mmscf
Jan-09	974	0.97	14.85
Feb-09	884	0.88	14.51
Mar-09	961	0.96	14.37
Apr-09	1040	1.04	14.18
May-09	937	0.94	13.96
Jun-09	936	0.94	13.66
Jul-09	1005	1.01	13.47
Aug-09	951	0.95	13.27
Sep-09	893	0.89	12.98
Oct-09	666	0.67	12.49
Nov-09	995	1.00	12.37
Dec-09	540	0.54	11.80
Jan-10	856	0.86	11.64
Feb-10	319	0.32	10.98
Mar-10	746	0.75	10.85
Apr-10	633	0.63	10.52
May-10	874	0.87	10.35
Jun-10	942	0.94	10.36
Jul-10	1024	1.02	10.44
Aug-10	944	0.94	10.38
Sep-10	912	0.91	10.34
Oct-10	969	0.97	10.42
Nov-10	914	0.91	10.67
Dec-10	1032	1.03	10.71

<b>Permit limit, mmscf/yr</b>		<b>36.6</b>

Natural Gas Usage      Meter 3710

**DCOR, LLC  
Platform Gilda HTM Gas (Meter 3710)  
2010**

Days	January MCF	February MCF	March MCF	April MCF	May MCF	June MCF	July MCF	August MCF	September MCF	October MCF	November MCF	December MCF
1	31	31	33	0	29	27	36	30	30	40	29	31
2	30	31	33	0	29	30	36	30	30	31	29	31
3	31	31	33	0	28	40	36	30	30	31	29	31
4	26	32	35	0	29	30	36	30	27	31	30	31
5	27	33	35	0	29	30	36	31	28	31	32	31
6	27	33	32	4	26	30	36	31	31	31	30	31
7	26	30	30	9	29	30	36	30	31	30	30	31
8	27	8	29	21	28	31	36	30	31	30	30	31
9	26	0	30	21	28	31	35	30	33	31	30	31
10	26	0	28	26	28	31	36	30	30	30	30	31
11	26	0	26	26	28	31	36	30	30	31	32	31
12	26	0	26	30	28	31	35	30	30	32	31	35
13	26	0	26	30	21	30	36	30	30	31	30	31
14	25	0	27	29	22	31	36	30	30	31	31	31
15	25	0	24	30	21	31	30	30	30	30	30	33
16	25	0	23	30	21	31	30	30	31	31	29	33
17	25	0	23	29	27	31	31	31	31	31	34	37
18	31	0	25	28	38	31	30	30	28	31	30	37
19	31	0	27	30	37	31	31	32	30	31	30	36
20	31	0	27	30	26	31	31	31	31	34	30	36
21	32	0	26	26	29	31	30	31	31	31	30	38
22	32	0	20	30	28	31	31	31	32	33	31	36
23	31	0	23	30	28	31	31	31	31	32	31	34
24	31	0	21	30	28	33	32	30	31	31	31	35
25	25	28	20	29	30	34	32	30	31	31	31	35
26	26	31	20	29	29	33	31	30	31	33	31	33
27	26	0	22	29	29	32	31	31	31	34	31	35
28	27	31	22	29	29	32	31	31	31	31	31	33
29	26	0	0	0	31	31	30	31	31	31	31	33
30	26	0	0	28	30	35	30	31	30	24	30	35
31	26	0	0		31		30	31		29		35
<b>TOTALS</b>	<b>856</b>	<b>319</b>	<b>746</b>	<b>633</b>	<b>874</b>	<b>942</b>	<b>1024</b>	<b>944</b>	<b>912</b>	<b>969</b>	<b>914</b>	<b>1032</b>

**TOTAL FOR YEAR 10165 MCF**



Formally General Petroleum

1/21/2011

## Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to

DCOR FOR M/V RYAN T, PATRICK, LUKE & PETER MAC FROM 1/1/2010-12/31/2010

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-5453 and are 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 - 20,200 BTU per pound range.

Hope Bowles

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



Hazen Research, Inc.  
 4601 Indiana Street  
 Golden, CO 80403 USA  
 Tel: (303) 929-4501  
 Fax: (303) 278-1520

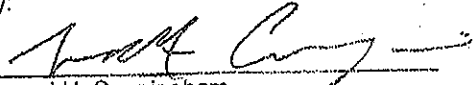
DATE September 9, 2010  
 PROJ. # 009-479  
 CTRL # H264/10  
 REC'D 08/20/10

Aeros Environmental, Inc.  
 Lisa Marriott-Smith  
 18828 Highway 65  
 Bakersfield, California 93308

Sample Number: H264/10-1  
 Sample Identification: Diesel Fuel 08/18/10 OCS Supply Boat Ryan T Main Engines Project #092-6792B

	As Assayed	Normalized
<b>ULTIMATE</b>		
Water, %	0.011	0.011
Ash, %	<0.001	<0.001
Sulfur, %	0.006	0.006
Carbon, %	89.42	87.78
Hydrogen, %	12.3	12.1
Nitrogen, %	0.13	0.13
Oxygen, %*	<0.01	0.00
<b>PROXIMATE</b>		
Water, %	0.011	0.011
Ash, %	<0.001	<0.001
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	136.876	
Calorific Value, BTU/lb	19.807	
API Gravity	39.4	
Density, g/cc	0.828	
F-Factor, DSCF/MMBTU @ 68° F		8915 @ 60° 9001 @ 68°

By:

  
 Gerard H. Cunningham  
 Fuel Laboratory Manager



# Petroleum Testing Services, Inc.

Aeros Environmental, Inc.  
18828 Highway 65  
Bakersfield, CA 93308

August 20, 2010  
Job #: AEI 082010-2  
Page: 1 of 1

Lisa Marriott-Smith

## Laboratory Report

Matrix: Diesel Fuel  
Sample Preparation: None, determined as is  
Results:

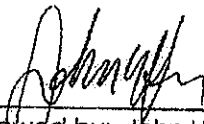
**Sample ID**

**Sulfur, ppm  
ASTM D7039**

DCOR, LLC  
Location: OCS Supply Boat Ryan T, 08/18/2010,  
Project # 092-6792B, PO#: 20371, Unit: Main Engines  
District: SBCAPCD, Diesel Fuel

7

  
Analysis Performed by: Jack McDonnell

  
Report Reviewed by: John Hafen

Peak Petroleum Testing Services, Inc. has prepared this report for the client listed above, and any third parties who might have received this report in error are respectfully asked to return this data to the intended recipient. The data contained on this report may contain privileged client information and may not be used, in any way, by a third party without prior written consent of both the client and Peak Petroleum Testing Services, Inc. Although every effort has been made to obtain the most accurate test data possible, Peak Petroleum Testing Services, Inc. does not guarantee test data results.



Hazen Research, Inc.  
4601 Indiana Street  
Golden, CO 80403 USA  
Tel: (303) 279-4501  
Fax: (303) 279-1509

DATE September 9, 2010  
PROJ. # 009-479  
CTRL # H263/10  
REC'D 08/20/10

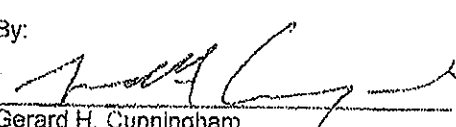
Aeros Environmental, Inc.  
Lisa Marriott-Smith  
18828 Highway 65  
Bakersfield, California 93308

Sample Number: H263/10-1

Sample Identification: Diesel Fuel 08/17/10 OCS Crew Boat Alan T Main Engines Project #092-6792A

	As Assayed	Normalized
<b>ULTIMATE</b>		
Water, %	0.010	0.010
Ash, %	<0.001	<0.001
Sulfur, %	0.016	0.016
Carbon, %	89.54	87.81
Hydrogen, %	12.3	12.1
Nitrogen, %	0.11	0.11
Oxygen, %*	<0.01	0.00
<b>PROXIMATE</b>		
Water, %	0.010	0.010
Ash, %	<0.001	<0.001
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	136,341	
Calorific Value, BTU/lb	19,682	
API Gravity	39.0	
Density, g/cc	0.830	
F-Factor, DSCF/MMBTU @ 68° F		8971.5 20 8068 2.65

By:

  
Gerard H. Cunningham  
Fuel Laboratory Manager



## Petroleum Testing Services, Inc.

Aeros Environmental, Inc.  
18828 Highway 65  
Bakersfield, CA 93308

August 20, 2010  
Job #: AEI 082010-3  
Page: 1 of 1

Lisa Marriott-Smith

### Laboratory Report


Matrix: Diesel Fuel  
Sample Preparation: None, determined as is  
Results:

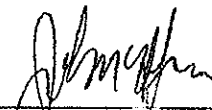
#### Sample ID

**Sulfur, ppm**  
**ASTM D7039**

DCOR, LLC  
Location: OCS Crew Boat Alan T, 08/17/2010,  
Project # 092-6792A, PO#: 20369, Unit: Main Engines  
District: SBCAPCD, Diesel Fuel

7

  
Analysis Performed by: Jack McDonnell

  
Report Reviewed by: John Hafen

*Peak Petroleum Testing Services, Inc. has prepared this report for the client listed above, and any third parties who might have received this report in error are respectfully asked to return this data to the intended recipient. The data contained on this report may contain privileged client information and may not be used, in any way, by a third party without prior written consent of both the client and Peak Petroleum Testing Services, Inc. Although every effort has been made to obtain the most accurate test data possible, Peak Petroleum Testing Services, Inc. does not guarantee test data results*



## Platforms Gina and Gilda Fuel Usage (in Gallons)

### Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
Jan-09	11,925	2,981	8,944
Feb-09	11,250	2,813	8,438
Mar-09	10,600	2,650	7,950
Apr-09	9,725	2,431	7,294
May-09	11,676	2,919	8,757
Jun-09	9,701	2,425	7,276
Jul-09	10,375	2,594	7,781
Aug-09	10,235	2,559	7,676
Sep-09	9,375	2,344	7,031
Oct-09	9,738	2,435	7,304
Nov-09	9,300	2,325	6,975
Dec-09	9,375	2,344	7,031
Jan-10	7,850	1,963	5,888
Feb-10	9,850	2,463	7,388
Mar-10	11,700	2,925	8,775
Apr-10	9,951	2,488	7,463
May-10	12,200	3,050	9,150
Jun-10	9,101	2,275	6,826
Jul-10	10,350	2,588	7,763
Aug-10	9,825	2,456	7,369
Sep-10	9,875	2,469	7,406
Oct-10	9,925	2,481	7,444
Nov-10	9,700	2,425	7,275
Dec-10	10,150	2,538	7,613
<b>2010 Total</b>	<b>30,119</b>	<b>90,358</b>	

### Supply Boat Fuel Usage

	Gina		Gilda	
	Main	Aux	Main	Aux
Jan-09	798.3	33.26	2395	99.79
Feb-09	478.9	19.95	1436.6	59.86
Mar-09	439.1	18.3	1317.3	54.89
Apr-09	599.6	24.98	1798.9	74.95
May-09	408.5	17.02	1225.6	51.07
Jun-09	122.7	5.11	368.1	15.34
Jul-09	112.5	4.68	337.6	14.07
Aug-09	159.7	1.6	479.2	19.97
Sep-09	113.9	4.74	341.6	14.23
Oct-09	89.53	3.73	268.6	11.19
Nov-09	68.48	2.85	205.45	8.56
Dec-09	104.7	4.36	314.1	13.09
Jan-10	122.1	5.09	366.3	15.26
Feb-10	287.6	11.98	862.8	35.95
Mar-10	492.2	20.51	1476.6	61.53
Apr-10	537.4	22.39	1612.1	67.17
May-10	601.4	25.06	1804.1	75.17
Jun-10	321.9	13.42	965.8	40.25
Jul-10	96.00	4.00	287.90	12.00
Aug-10	157.4	1.57	472.3	19.68
Sep-10	174.70	7.28	524.00	21.83
Oct-10	173.40	7.23	520.20	21.68
Nov-10	214.06	8.92	642.19	26.76
Dec-10	121.31	5.05	363.92	15.16
<b>2010 Total</b>	<b>3,299</b>	<b>133</b>	<b>9,898</b>	<b>412</b>

	Rolling 12 Mo Total	
	Gina	Gilda
Jan-09	47,335	139,286
Feb-09	47,410	139,180
Mar-09	46,902	136,768
Apr-09	44,810	132,249
May-09	44,275	129,544
Jun-09	42,939	126,062
Jul-09	41,964	121,597
Aug-09	40,821	119,044
Sep-09	40,024	115,099
Oct-09	37,904	110,735
Nov-09	36,477	106,703
Dec-09	35,705	103,381
Jan-10	33,583	98,212
Feb-10	32,438	96,564
Mar-10	32,748	97,555
Apr-10	32,843	97,530
May-10	33,074	98,526
Jun-10	33,081	98,698
Jul-10	33,014	98,628
Aug-10	32,984	98,313
Sep-10	33,209	98,878
Oct-10	33,688	99,280
Nov-10	34,366	100,035
Dec-10	34,671	100,668

Platform Gina Permitted Fuel Total: 84,398  
 Platform Gilda Permitted Fuel Total: 253,390

**Platforms Gina and Gilda**  
**Annual Crew and Supply Boat Emissions**  
 (Based Upon 12 Month "Rolling" Total Fuel Usage)

	Platform Gina						Platform Gilda								
	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY
Jan-09	0.78	13.28	0.79	0.18	2.41	2.31	39.07	2.33	0.52	7.10					
Feb-09	0.79	13.30	0.79	0.18	2.42	2.31	39.04	2.33	0.52	7.10					
Mar-09	0.78	13.16	0.79	0.18	2.39	2.27	38.36	2.29	0.51	6.98					
Apr-09	0.74	12.57	0.75	0.17	2.29	2.19	37.10	2.22	0.50	6.74					
May-09	0.73	12.42	0.74	0.17	2.26	2.15	36.34	2.17	0.49	6.61					
Jun-09	0.71	12.04	0.72	0.16	2.19	2.09	35.36	2.11	0.47	6.43					
Jul-09	0.70	11.77	0.70	0.16	2.14	2.02	34.11	2.04	0.46	6.20					
Aug-09	0.68	11.45	0.68	0.15	2.08	1.97	33.39	1.99	0.45	6.07					
Sep-09	0.66	11.23	0.67	0.15	2.04	1.91	32.29	1.93	0.43	5.87					
Oct-09	0.63	10.63	0.63	0.14	1.93	1.84	31.06	1.85	0.42	5.65					
Nov-09	0.60	10.23	0.61	0.14	1.86	1.77	29.93	1.79	0.40	5.44					
Dec-09	0.59	10.02	0.60	0.13	1.82	1.71	29.00	1.73	0.39	5.27					
Jan-10	0.56	9.42	0.56	0.13	1.71	1.63	27.55	1.65	0.37	5.01					
Feb-10	0.54	9.10	0.54	0.12	1.65	1.60	27.09	1.62	0.36	4.92					
Mar-10	0.54	9.19	0.55	0.12	1.67	1.62	27.36	1.63	0.37	4.98					
Apr-10	0.54	9.21	0.55	0.12	1.67	1.62	27.36	1.63	0.37	4.97					
May-10	0.55	9.28	0.55	0.12	1.69	1.63	27.64	1.65	0.37	5.02					
Jun-10	0.55	9.28	0.55	0.12	1.69	1.64	27.68	1.65	0.37	5.03					
Jul-10	0.55	9.26	0.55	0.12	1.68	1.63	27.67	1.65	0.37	5.03					
Aug-10	0.55	9.25	0.55	0.12	1.68	1.63	27.58	1.65	0.37	5.01					
Sep-10	0.55	9.32	0.56	0.12	1.69	1.64	27.74	1.66	0.37	5.04					
Oct-10	0.56	9.45	0.56	0.13	1.72	1.65	27.85	1.66	0.37	5.06					
Nov-10	0.57	9.64	0.58	0.13	1.75	1.66	28.06	1.68	0.38	5.10					
Dec-10	0.57	9.73	0.58	0.13	1.77	1.67	28.24	1.69	0.38	5.13					

Emission Factors	
ROC	33.15 lb/Mgal
NOx	561.00 lb/Mgal
PM	33.50 lb/Mgal
SOx	7.50 lb/Mgal
CO	102.00 lb/Mgal

Permitted Emissions	
Plt Gina	Plt Gilda
1.40	4.20
23.68	71.07
1.41	4.24
0.31	0.95
4.31	12.92

Supporting Documentation  
 PC 1, #5

**PLATFORM GINA and GILDA BOOM BOAT  
Fuel Usage  
2 - 70 bhp Suzuki Gasoline Engines, Model DF-70**

	Total Usage	12 Mo 'Running' Total	12 Mo 'Running' Total	
	Gasoline gal	Gasoline gal	Gina 50% gal	Gilda 50% gal
Jan-09	0.00	4.4	2.18	2.18
Feb-09	0.05	4.3	2.16	2.16
Mar-09	0.40	4.7	2.35	2.35
Apr-09	1.60	6.3	3.15	3.15
May-09	0.15	6.5	3.23	3.23
Jun-09	3.20	9.4	4.70	4.70
Jul-09	0.00	9.1	4.55	4.55
Aug-09	0.00	5.9	2.95	2.95
Sep-09	0.00	5.7	2.83	2.83
Oct-09	0.20	5.7	2.85	2.85
Nov-09	0.90	6.5	3.25	3.25
Dec-09	1.40	7.9	3.95	3.95
Jan-10	0.00	7.9	3.95	3.95
Feb-10	0.25	8.1	4.05	4.05
Mar-10	0.10	7.8	3.90	3.90
Apr-10	0.05	6.3	3.13	3.13
May-10	0.10	6.2	3.10	3.10
Jun-10	0.00	3.0	1.50	1.50
Jul-10	2.40	5.4	2.70	2.70
Aug-10	0.70	6.1	3.05	3.05
Sep-10	0.70	6.8	3.40	3.40
Oct-10	0.10	6.7	3.35	3.35
Nov-10	0.10	5.9	2.95	2.95
Dec-10	1.45	6.0	2.98	2.98
Permit limit per Platform (gallons/year)			<b>500</b>	<b>500</b>

Note: Starting in 6/08, fuel use calculated based on hourly usage and rate of 0.5 gallon/hour  
 Boom Boat is physically located on Platform Gilda.  
 Fuel use is split 50/50 between Platforms Gina and Gilda.

**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
**Report for the 1st Quarter of 2010**

<b>FACILITY: DCOR PLATFORM GILDA</b>					<b>PERMIT#: 1492</b>	
<b>Method of Inspection:</b> <u>TVA</u>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>
	<b>Accessible Inspected:</b>	2,820	18,267	0	3	0
	<b>Inacc. Insp. To Date:</b>	N/A	N/A	N/A	N/A	N/A
	<b>Total # Leaking:</b>	0	1	0	0	0
	<b>% Leaking:</b>	0.00%	0.01%	0.00%	0.00%	0.00%

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve	Well Bay #1, Well S-71	3/24/2010 1:00PM	3/24/2010 1:00PM	8,000	N/A	3/24/2010	20
Cap	Well Bay #1, Well S-71	3/24/2010 2:00PM	3/24/2010 2:00PM	3,000	N/A	3/24/2010	0
Cap	Well Bay #2, Well S-35	3/24/2010 3:00PM	3/24/2010 3:00PM	30,000	N/A	3/24/2010	0
Ball Valve	Production Deck, Test Separator #1	3/24/2010 4:00PM	3/24/2010 4:00PM	4 DPM	Minor	3/24/2010	0 DPM
Cameron Clamp	Well Bay #3, Well S-26	3/24/2010 5:00PM	3/24/2010 5:00PM	16,800	N/A	OPEN	
Orifice Valve	Production Deck, Sales Gas Meter	3/25/2010 7:00AM	3/25/2010 7:00AM	5,460	N/A	3/25/2010	100
Union	Production Deck, Flare Pilot Filer Line	3/25/2010 1:00PM	3/25/2010 1:00PM	2,800	N/A	3/25/2010	0

**VENTURA COUNTY APCD  
 RULE 74.10  
 COMPONENT LEAK REPORT  
 Report for the 2nd Quarter of 2010**

FACILITY: DCOR, PLATFORM GILDA		PERMIT#: 1492					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve - Casing Wing	Well Bay #4, Well #S-3	6/24/2010 1:00PM	6/24/2010 1:00PM	5,500	N/A	6/24/2010	0
Valve - Casing Wing	Well Bay #4, Well #S-54	6/24/2010 2:00PM	6/24/2010 2:00PM	12,000	N/A	6/24/2010	0
Hatch	Sub Deck, ABJ 810	6/25/2010 2:00PM	6/25/2010 2:00PM	8,500	N/A	6/25/2010	10
Nipple	Production Deck, Flare Pilot Line	6/25/2010 3:00PM	6/25/2010 3:00PM	12,000	N/A	6/25/2010	0

**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
**Report for the 3rd Quarter of 2010**

<b>FACILITY: DCOR, PLATFORM GILDA</b>				<b>PERMIT#: 1492</b>			
<b>Method of Inspection: TVA</b>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>	
	<b>Accessible Inspected:</b>	<b>2,820</b>	<b>18,267</b>	<b>0</b>	<b>3</b>	<b>0</b>	
	<b>Inacc. Insp. To Date:</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	
	<b>Total # Leaking:</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	
	<b>% Leaking:</b>	<b>0.00%</b>	<b>0.01%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	
<b>Component Description</b>	<b>Operating Unit / Location</b>	<b>Detection Date/Time</b>	<b>Inspection Date/Time</b>	<b>Gas Leak (ppmv)</b>	<b>Liquid Leak major/minor</b>	<b>Repair Date</b>	<b>Post Repair Rate (ppmv)</b>
Valve - Ball	Well Bay #3	Sep 9 1:15PM	Sep 9 1:15PM	22,000	N/A	09/09/2010	0
Clamp	Well Bay #3	Sep 9 3:00PM	Sep 9 3:00PM	48,000	N/A	09/25/2010	100
Valve - Casing Wing	Well Bay #4	Sep 9 12:05PM	Sep 9 12:05PM	18,000	N/A	09/09/2010	0
Valve - Manifold	Production Deck	Sep 10 10:45AM	Sep 10 10:45AM	2,500	N/A	09/10/2010	0
Meter	Production Deck	Sep 10 12:10PM	Sep 10 12:10PM	16,000	N/A	09/10/2010	0

**VENTURA COUNTY APCD  
RULE 74.10  
COMPONENT LEAK REPORT  
Report for the 4th Quarter of 2010**

<b>FACILITY: <u>DCOR PLATFORM GILDA</u></b>		<b>PERMIT#: <u>1492</u></b>				
<b>Method of Inspection: <u>TVA</u></b>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>
	<b>Accessible Inspected:</b>	<b>2,820</b>	<b>18,267</b>	<b>0</b>	<b>3</b>	<b>0</b>
	<b>Inacc. Insp. To Date:</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
	<b>Total # Leaking:</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>% Leaking:</b>	<b>0.00%</b>	<b>0.01%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Clamp	Well Bay #2, Well S-57	11/03/2010 1:15PM	11/03/2010 1:15PM	1,200	N/A	11/5/2010	298
Tube Fitting	Well Bay #1, Well S-61	11/03/2010 12:50PM	11/03/2010 12:50PM	5,400	N/A	11/3/2010	0
Hatch	Sub Deck, #1 Waste Water Tank	11/04/2010 8:45AM	11/04/2010 8:45AM	6,000	N/A	11/4/2010	0
Other Connector	Sub Deck, Vapor Recovery Compressor	11/04/2010 9:05AM	11/04/2010 9:05AM	15,000	N/A	11/4/2010	0
Valve - Orifice	Production Deck, V-1	11/04/2010 10:20AM	11/04/2010 10:20AM	4,000	N/A	11/4/2010	0

Inspection performed utilizing EPA Method 21  
PREPARED BY AVANTI ENVIRONMENTAL, INC.

**PLATFORM GILDA  
FLARE USAGE (MMSCF)**

**100 MMBtu/hr Flare**

2009-2010	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMSCF	Planned MMCF
Jan-09	23	0.0	158.0	0.5830	0.99
Feb-09	12	0.0	0.0	0.5720	0.98
Mar-09	12	71.0	1257.0	0.5540	2.23
Apr-09	12	0.0	8.0	0.5360	2.15
May-09	14	0.0	0.0	0.5195	2.08
Jun-09	13	0.0	147.0	0.5047	2.22
Jul-09	14	0.0	80.0	0.4895	2.27
Aug-09	13	21.0	16.0	0.4737	2.15
Sep-09	14	0.0	39.0	0.4572	2.06
Oct-09	14	0.0	25.0	0.4399	1.86
Nov-09	5	1.0	43.0	0.4151	1.87
Dec-09	8	2.2	6.2	0.3989	1.78
Jan-10	10	0.0	20.4	0.3849	1.64
Feb-10	7	2.0	6.2	0.3726	1.65
Mar-10	8	0.0	11.5	0.3579	0.40
Apr-10	6	3.0	38.0	0.3410	0.43
May-10	6	0.0	1372.0	0.3227	1.80
Jun-10	6	5.0	10.0	0.3060	1.67
Jul-10	6	0.0	18.0	0.2861	1.61
Aug-10	6	2.0	35.0	0.2672	1.62
Sep-10	27	2.0	-11.0	0.2701	1.60
Oct-10	25	0.0	26.0	0.2820	1.60
Nov-10	20	0.0	22.0	0.2917	1.58
Dec-10	25	0.0	40.0	0.3050	1.61

Permit Limit Planned Flaring MMCF/YR **50.51**

Supporting Documentation  
PC 2, #1 and #4



**Monthly Flare Logs**

**Supporting Documentation**

**PC 2, #1 and #4**

**Rule 54.B1, 54.B2**

# PLATFORM GILDA FLARE LOG

Record Flaring > 10 minutes - Record H2S ppm							January-10	
Callin's Breakdown Report to O&A Summary Flare Gas Logging Operational Period							PLANNED OR UNPLANNED	OPERATOR INITIALS
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated H2S (PPM)	Reason for Flare			
1/8/10	13:00	13:10	8.4	0	Switched gas comp.	unplanned	JH	
1/9/10	14:30	14:33	2	0	high inlet psi on GC-3	unplanned	JH	
1/9/10	15:15	15:20	3.4	0	high inlet psi on GC-3	unplanned	JH	
1/17/10	23:25	23:30	4	0	high inlet psi on GC-3	unplanned	AD	
1/24/10	20:45	20:47	1	0	Vapor compressor S/D	unplanned	JH	
1/25/10	11:45	11:46	0.6	0	Amine plant upset	unplanned	JH	
1/28/10	15:40	15:41	1	0	Amine plant S/D	unplanned	LV	

**A)** Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. **E)** All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Callipara, Coahuila, Mexico, FPS (T3)							February-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
2/7/10	9:28	9:40	1.1	0	Testing TSH on Gas Comp	PLANNED	J.H.	
2/8/10	12:10	12:12	1.1	0	Testing PSV on waste oil S/D Platform	PLANNED	J.H.	
2/18/10	10:00	10:07	4	0	Testing LSL on Waste Oil S/D Platform	PLANNED	J.H.	
2/23/10	15:45	15:40	2	0	Blowing Down S-28 Csg	UNPLANNED	F.S.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Company Name: <b>BP Energy Services</b>					Location: <b>Platform Gilda</b>			Date: <b>March-10</b>	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H <sub>2</sub> S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
3/12/10	18:04	18:06	6	0	Gas Compressor #3 S/D	UNPLANNED	F.P.		
3/22/10	7:15	7:18	1.5	0	Amine Plant Upset	UNPLANNED	J.H.		
3/22/10	22:15	22:17	1	0	Amine Plant Upset	UNPLANNED	J.H.		
3/26/10	21:55	21:57	3	0	Gas Compressor #3 S/D	UNPLANNED	L.V.		

A) Unplanned flaring >300 ppm H<sub>2</sub>S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H<sub>2</sub>S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H<sub>2</sub>S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Record Keeping Requirements: Estimated or Measured H <sub>2</sub> S							Apr-10
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H <sub>2</sub> S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
4/7/10	10:30	10:32	2	0	GC-3 S/D HIGH PRESS	UNPLANNED	T.S.
4/7/10	11:40	11:42	2	0	GC-3 S/D HIGH PRESS	UNPLANNED	T.S.
4/7/10	12:10	12:12	2	0	GC-3 S/D HIGH PRESS	UNPLANNED	T.S.
4/8/10	12:45	12:47	5	0	GC-3 S/D HIGH INLET PRESS	UNPLANNED	J.W.
4/8/10	22:42	22:45	3	0	GC-3 S/D HIGH INLET PRESS	UNPLANNED	A.D.
4/9/10	12:15	12:17	6	0	AMINE PLANT S/D	UNPLANNED	J.W.
4/10/10	15:43	15:45	3	0	PLT. S/D PLC	UNPLANNED	J.W.
4/12/10	8:43	8:45	3	0	PLT. START UP	PLANNED	J.W.
4/16/10	8:15	8:18	3	0	AMINE PLANT S/D	UNPLANNED	F.S.
4/17/10	8:17	8:20	3	0	GC-3 LOW OIL PSI (CHILLER DIFF)	UNPLANNED	F.S.
4/24/10	0:30	0:35	7	0	PLT.S/D	UNPLANNED	J.W.
4/25/10	8:30	8:32	2	0	AMINE PLANT S/D & GAS COMP.	UNPLANNED	L.V.

**A)** Unplanned flaring >300 ppm H<sub>2</sub>S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H<sub>2</sub>S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Planned flaring >300 ppm H<sub>2</sub>S for any duration requires a 72-hr written notice to APCD. **E)** All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

							May-10
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
5/3/10	14:50	14:53	3	0	Test gc #2 oil pump	UNPLANNED	F.S
5/5/10	14:18	14:21	3	0	S-42 unloaded / shutdown on high psi	UNPLANNED	F.S
5/5/10	16:58	17:01	3	0	amine plant upset	UNPLANNED	N.T
5/7/10	6:00	6:02	7	0	GC #3 S/D	UNPLANNED	L.V
5/14/10	15:00	15:03	7	0	GC #2 S/D	UNPLANNED	R.T
5/18/10	4:35	0:00	695	0	GC #2 S/D Power flicker GC#2 DWN.FOR REPAIRS	UNPLANNED	F.S
5/19/10	0:00	15:35	599	0	GC #2 & #3 dwn.for repairs	UNPLANNED	F.S
5/26/10	1:00	1:30	31	0	GC#2 S/D sheared oil pump pin.	UNPLANNED	A.D
5/27/10	21:40	22:10	24	0	Change hose on GC#2 oil pump	UNPLANNED	J.H

**A)** Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. **E)** All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Report all H <sub>2</sub> S spikes. Report H <sub>2</sub> S (ppm) to Calhoun, Eshelby, Lewis, or Williams. Call the Engineering Department at 781-221-1111.							<b>Jun-10</b>	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H <sub>2</sub> S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
6/2/10	9:40	9:44	4	0	Partial Platform S/D	UNPLANNED	J H	
6/15/10	18:27	18:31	4	0	Partial Platform S/D - Amine Plant Upset	UNPLANNED	T S	
6/25/10	13:24	13:26	2	0	Working on Gas Line Repair Leaks	UNPLANNED	J H	
6/30/10	15:30	15:32	5	0	Platform start up after planned shut down.	PLANNED	LV	

**A) Unplanned flaring >300 ppm H<sub>2</sub>S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H<sub>2</sub>S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H<sub>2</sub>S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.**

# PLATFORM GILDA FLARE LOG

Record Flaring > 0 minutes. Report H2S ppm (ppm) Call to Breakdown Report 607-633-1111 or 607-633-1112 (Flaring Logging Logbook) Email: flaring.logging@ogard.com						Jul-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
7/9/10	8:13	8:16	3	0	GC # 2 S/D WORKING ON PLC WONDERWARE	UNPLANNED	F.S.
7/10/10	1400	1405	6	0	TROUBLE SHOOTING GC# 3	UNPLANNED	F.S.
7/13/10	1,400	1403	3	0	AMINE PLANT UPSET	UNPLANNED	F.S.
7/15/10	1045	1048	3	0	GC # 3 S/D WORKING ON GC#2	UNPLANNED	C.D.
7/29/10	1430	1431	3	0	AMINE PLANT UPSET	UNPLANNED	C.D.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.



# PLATFORM GILDA FLARE LOG

Platform Name: Gildas, Platform H2S ppm (ppm) Call to a base town Report to APCD, Platform H2S ppm (ppm) Call to a base town Report to APCD							Aug-10
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
8/6/10	12:00	12:03	3	0	S/D G/C Testing Temps	UNPLANNED	R.T.
8/17/10	18:30	18:31	2	0	Taking Amine Plant Out of Bypass	PLANNED	J.W.
8/18/10	17:30	17:31	4	0	Amine Plant Upset	UNPLANNED	J.W.
8/19/10	13:42	13:45	3	0	PLC Wonder Ware Programming	UNPLANNED	F.S.
8/22/10	2:45	3:15	22	0	Leak @ Amine Plant - Amine upset	UNPLANNED	R.T.
8/27/10	11:40	11:41	1	0	Amine Plant S/D	UNPLANNED	L.V.
8/27/10	14:00	14:01	2	0	Vapor Comp S/D	UNPLANNED	L.V.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H <sub>2</sub> S in ppm (or weight % if flaring is unplanned). Swing to 2'.						Sep-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H <sub>2</sub> S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
9/5/10	13:30	13:33	3	NONE	ACID GAS COMP. DOWN / AMINE SHUT DOWN	UNPLANNED	F. S.
9/9/10	16:50	16:51	2	NONE	TAKING AMINE PLANT OUT OF BYPASS	PLANNED	J. W.
9/12/10	18:41	18:42	2	NONE	ACID GAS COMP. SHUT DOWN	UNPLANNED	C.D.
9/16/10	18:00	18:01	1	NONE	G.C.#3 SHUT DOWN DUE TO SENDING GAS PIG	UNPLANNED	J.H.
9/18/10	6:41	6:46	5	NONE	LIGHT FLICKER AMINE PL. AND G.C.#3 SHUT DOWN	UNPLANNED	F.S.

A) Unplanned flaring >300 ppm H<sub>2</sub>S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H<sub>2</sub>S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H<sub>2</sub>S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Oct-10

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/1/10	1:30	1:33	10	0	GC-3 S/D & switch to GC-2	UNPLANNED	L.V.
10/9/10	11:45	11:46	2	0	GC-2 S/D	UNPLANNED	L.V.
10/19/10	18:05	18:10	4	0	Power flicker	UNPLANNED	T.S.
10/31/10	17:50	18:00	10	0	High discharge psi in gas pig blow down line	UNPLANNED	F.S.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm if not sweet or				Call for Breakdown Report to V&E by 11:00 AM. Flaring longer than 1 hour requires a Breakdown Report to APCD.		Nov-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
11/2/10	8:50	9:00	14	0	Small fire in Production Room, Partial Pit. S/D	UNPLANNED	FS
11/18/10	17:45	18:00	5	0	GC#2 S/D Low PSI	UNPLANNED	AD
11/25/10	16:30	16:33	3	0	Partial Pit.S/D due to PLC system work	UNPLANNED	TS

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GILDA FLARE LOG

Cell Log - Unplanned H2S Spills							Dec-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
12/6/10	10:07	10:08	4	0	amine plant s/d	unplanned	A.D	
12/7/10	07:50	07:51	2	0	amine plant s/d	unplanned	A.D	
12/7/10	11:40	11:41	2	0	amine plant s/d	unplanned	A.D	
12/10/10	2:00	2:10	8	0	starting gas comp.#3	unplanned	JH	
12/13/10	10:22	10:37	13	0	power flicker s/d.	unplanned	JH	
12/14/10	12:06	12:08	3	0	amine plant s/d	unplanned	FS	
12/17/10	12:52	12:54	2	0	working on shipping tk level control	unplanned	JW	
12/26/10	6:30	6:35	4	0	GC-2 S/D	unplanned	TS	
12/28/10	21:18	21:20	2	0	S-24 unloading high press. s/d on main scrubber.	unplanned	JH	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.

**PLATFORM GILDA**  
**Visible Emissions Inspection Record - VCAPCD**

<b>Date</b>	<b>Time</b>	<b>Inspected by</b>	<b>Emission Unit</b>	<b>Observations/Corrective Action</b>
7-May-10	9:00 - 9:02	James Vanhoy	HTM Heater	No Visible Emissions
7-May-10	9:30 - 9:32	James Vanhoy	North Crane	No Visible Emissions
7-May-10	10:00 - 10:02	James Vanhoy	South Crane	No Visible Emissions
7-May-10	11:30 - 11:32	James Vanhoy	Standby Generator	No Visible Emissions

Platform Gilda 2010 Flaring Events						
100 MMBtu/hr Flare						
Flare Date	MCF flared	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	H2S ppm	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
1/8/10	8.4	0.6	0.005	0	0.00	0.000
1/9/10	2	0.6	0.001	0	0.00	0.000
1/9/10	3.4	0.6	0.002	0	0.00	0.000
1/11/10	4	0.6	0.002	0	0.00	0.000
1/24/10	1	0.6	0.001	0	0.00	0.000
1/25/10	0.6	0.6	0.000	0	0.00	0.000
1/28/10	1	0.6	0.001	0	0.00	0.000
2/7/10	1.1	0.6	0.001	0	0.00	0.000
2/8/10	1.1	0.6	0.001	0	0.00	0.000
2/18/10	4	0.6	0.002	0	0.00	0.000
2/23/10	2	0.6	0.001	0	0.00	0.000
3/12/10	6	0.6	0.004	0	0.00	0.000
3/22/10	1.5	0.6	0.001	0	0.00	0.000
3/22/10	1	0.6	0.001	0	0.00	0.000
3/26/10	3	0.6	0.002	0	0.00	0.000
4/7/10	2	0.6	0.001	0	0.00	0.000
4/7/10	2	0.6	0.001	0	0.00	0.000
4/7/10	2	0.6	0.001	0	0.00	0.000
4/8/10	5	0.6	0.003	0	0.00	0.000
4/8/10	3	0.6	0.002	0	0.00	0.000
4/9/10	6	0.6	0.004	0	0.00	0.000
4/10/10	3	0.6	0.002	0	0.00	0.000
4/12/10	3	0.6	0.002	0	0.00	0.000
4/16/10	3	0.6	0.002	0	0.00	0.000
4/17/10	3	0.6	0.002	0	0.00	0.000
4/24/10	7	0.6	0.004	0	0.00	0.000
4/25/10	2	0.6	0.001	0	0.00	0.000
5/3/10	3	0.6	0.002	0	0.00	0.000
5/5/10	3	0.6	0.002	0	0.00	0.000
5/5/10	3	0.6	0.002	0	0.00	0.000
5/7/10	7	0.6	0.004	0	0.00	0.000
5/14/10	7	0.6	0.004	0	0.00	0.000
5/18/10	695	0.6	0.417	0	0.00	0.000
5/19/10	599	0.6	0.359	0	0.00	0.000
5/26/10	31	0.6	0.019	0	0.00	0.000
5/27/10	24	0.6	0.014	0	0.00	0.000
6/2/10	4	0.6	0.002	0	0.00	0.000
6/15/10	4	0.6	0.002	0	0.00	0.000
6/25/10	2	0.6	0.001	0	0.00	0.000
6/30/10	5	0.6	0.003	0	0.00	0.000
7/9/10	3	0.6	0.002	0	0.00	0.000
7/10/10	6	0.6	0.004	0	0.00	0.000
7/13/10	3	0.6	0.002	0	0.00	0.000
7/15/10	3	0.6	0.002	0	0.00	0.000
7/29/10	3	0.6	0.002	0	0.00	0.000
8/6/10	3	0.6	0.002	0	0.00	0.000
8/17/10	2	0.6	0.001	0	0.00	0.000
8/18/10	4	0.6	0.002	0	0.00	0.000
8/19/10	3	0.6	0.002	0	0.00	0.000
8/22/10	22	0.6	0.013	0	0.00	0.000
8/27/10	1	0.6	0.001	0	0.00	0.000
8/27/10	2	0.6	0.001	0	0.00	0.000
9/5/10	3	0.6	0.002	0	0.00	0.000
9/9/10	2	0.6	0.001	0	0.00	0.000

Platform Gilda 2010 Flaring Events						
100 MMBtu/hr Flare						
Flare Date	MCF flared	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	H2S ppm	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
9/12/10	2	0.6	0.001	0	0.00	0.000
9/16/10	1	0.6	0.001	0	0.00	0.000
9/18/10	5	0.6	0.003	0	0.00	0.000
10/1/10	10	0.6	0.006	0	0.00	0.000
10/9/10	2	0.6	0.001	0	0.00	0.000
10/19/10	4	0.6	0.002	0	0.00	0.000
10/31/10	10	0.6	0.006	0	0.00	0.000
11/2/10	14	0.6	0.008	0	0.00	0.000
11/18/10	5	0.6	0.003	0	0.00	0.000
11/25/10	3	0.6	0.002	0	0.00	0.000
12/16/10	4	0.6	0.002	0	0.00	0.000
12/7/10	2	0.6	0.001	0	0.00	0.000
12/7/10	2	0.6	0.001	0	0.00	0.000
12/10/10	8	0.6	0.005	0	0.00	0.000
12/13/10	13	0.6	0.008	0	0.00	0.000
12/14/10	3	0.6	0.002	0	0.00	0.000
12/17/10	2	0.6	0.001	0	0.00	0.000
12/26/10	4	0.6	0.002	0	0.00	0.000
12/28/10	2	0.6	0.001	0	0.00	0.000
<b>TOTAL</b>	<b>1624.1</b>		<b>0.97</b>			<b>0.00</b>
<b>TOTAL SULFUR EMISSIONS</b>					<b>0.97</b>	<b>lb SO2</b>
<b>Annual Limits:</b>						
27,012 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)						
1.80 tons SOx/year (per PTO 1492, Table 4)						