



DCOR, LLC

**2011 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**

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DCOR, LLC – PLATFORM GILDA – PTO 1492

2011

COMPLIANCE VERIFICATION REPORT

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SECTION 1

Compliance Certification



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: 2/14/2012
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Time Period Covered by Compliance Certification <u>01</u> / <u>01</u> / <u>2011</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2011</u> (MM/DD/YY)

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"> • Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable • Verbal notice of maintenance activities • Rule 74.10 inspections • Annual compliance certification including verification that tanks are equipped with a vapor recovery system 	<ul style="list-style-type: none"> • Records of quarterly inspections and tank maintenance activities • Rule 74.10 records 	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> • Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve • Rule 74.10 inspections 	<ul style="list-style-type: none"> • 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 • Records to show integrity of roof and PV valves for tanks not permanently located at facility • Rule 74.10 records 	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.N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> Verbal notice of maintenance operations Rule 74.10 inspections Annual compliance certification including verifying the integrity of the cover 	<ul style="list-style-type: none"> Records of maintenance Rule 74.10 records 	None	None	
74.9N7	Rule 74.9.D.3	<ul style="list-style-type: none"> Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of operating hours Date, time, duration, and reason for emergency operation Records of engine data 	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only 	<ul style="list-style-type: none"> Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location 	None	None	
74.15.1N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> Annual compliance certification Biennial Source Test (NO_x, CO) Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters 	<ul style="list-style-type: none"> Records of source tests Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	

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"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO 1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	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"> Diesel fuel consumption for boats servicing Platforms Gina and Gilda Monthly calculations of emissions (boats) Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO1492PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation 	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation 	None	None	
PO1492PC1 - Condition No. 8	Rule 26 Boom Boat Fuel Limit	<ul style="list-style-type: none"> Gasoline consumption at Boom Boats Monthly gasoline consumption records Annual compliance certification 	<ul style="list-style-type: none"> Monthly gasoline consumption 	None	None	
PO1492PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1492PC2 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	
PO1492PC2 - Condition Nos. 2 and 3	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	

1.c.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"> Annual compliance certification Monthly records of backup utility generator hours of operation 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use Monthly and twelve month rolling records of hours of operation Monthly fuel consumption 	None	None	
PO1492PC3 - Condition No. 2	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> Annual compliance certification Recordkeeping 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) Monthly and twelve month rolling records of hours of operation 	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"> Routine surveillance Visual inspections Annual compliance certification, including a formal survey Opacity readings upon request Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> All occurrences of visible emissions for periods > 3 min in any one hour Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> Opacity - EPA Method 9 	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> Annual compliance certification Identify planned vs. unplanned flaring event Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event Upon request, source test for sulfur compounds at point of discharge 	<ul style="list-style-type: none"> Representative fuel analysis or exhaust analysis and compliance demonstration Flare records 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> Annual compliance certification Identify planned vs. unplanned flaring event Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event Determine ground or sea level concentrations of SO₂, upon request Annual compliance certification 	<ul style="list-style-type: none"> Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration Flare records 	None	<ul style="list-style-type: none"> SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.1	Rule 57.1	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> Annual compliance certification None for PUC-quality gas Annual test for non PUC-quality gas (submit with annual compliance certification) 	<ul style="list-style-type: none"> Annual fuel gas analysis for non PUC-quality gas 	None	<ul style="list-style-type: none"> SCAQMD Method 307-94 	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> Annual compliance certification Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> ASTM Method D4294-83 or D2622-87 	

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

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"> Annual compliance certification Identify leaking components Inspections every shift or 8 hours at natural gas processing plants Daily and/or weekly inspections for specified equipment Quarterly inspections for specified components Pressure relief valve inspections Annual update to Operator Management Plan Notification of major leaks in critical components Notification of repeat leaks 	<ul style="list-style-type: none"> Records of leak inspections in inspection log 	None	<ul style="list-style-type: none"> Gas Leaks - EPA Method 21 ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82 API Gravity - ASTM Method D287 	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> Annual compliance certification Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> Annual compliance certification Maintain furnace identification records 	<ul style="list-style-type: none"> Records of current furnace information 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of natural gas-fired, fan-type furnaces

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"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation-Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> VOC content-EPA Method 24, CARB Method 432 Acid content-ASTM Method D 1613-85. Metal content-SCAQMD Method 311-91 	
74.16	Rule 74.16	<ul style="list-style-type: none"> Annual compliance certification to ensure grid power being used, and/or Annual compliance certification to ensure drilling engine has a valid APCD Permit to Operate, and meets NOx limit, or Maintain cost analysis documentation as verification to grid power exemption, if applicable Annual source tests (NO_x) or engine manufacturer certification 	<ul style="list-style-type: none"> Records of source tests or engine manufacturer certification Records of cost analysis documentation 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 	

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SECTION 2

Breakdowns, Deviations, and Excess Emissions

PTO 1492: Platform Gilda

Reporting Period: January 1, 2011 through December 31, 2011

There were five (5) breakdowns and one (1) deviation filed during this reporting period, as summarized on the following Annual Compliance Certification Deviation Summary Forms.

Excess emissions were:

5/10/11 - 5/11/11 2,407 lbs ROC



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>5/3/2011</u> <u>9:20</u></p> <p>End <u>5/3/2011</u> <u>9:53</u></p> <p>When Discovered: Date & Time</p> <p><u>5/3/2011</u> <u>9:20</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>Loss of electrical power to facility due to SCE service outage.</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>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Flare Pilot</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>3/10/2011</u> <u>19:30</u></p> <p>End <u>3/11/2011</u> <u>9:45</u></p> <p>When Discovered: Date & Time</p> <p><u>3/11/2011</u> <u>9:45</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>Excess emissions of 2,407 lbs ROC</p>
<p>G. Probable Cause of Deviation</p> <p>When amine plant was started up, discharge valve was not successfully reset to direct produced treated gas to sales gas system. It was directed to flare without pilot and uncombusted.</p>		<p>H. Corrective actions taken:</p> <p>Discharge valve was reset to direct gas to sales gas system. Flare pilot was re-lit. Going forward, flare pilot will be monitored and recorded every two hours.</p>
<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>5/29/2011</u> <u>2:00</u></p> <p>End <u>5/29/2011</u> <u>2:05</u></p> <p>When Discovered: Date & Time</p> <p><u>5/29/2011</u> <u>2:00</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. There was no venting; therefore, no excess emissions.</p>



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>9/2/2011</u> <u>4:58</u> End <u>9/2/2011</u> <u>5:03</u> When Discovered: Date & Time <u>9/2/2011</u> <u>4:58</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation Loss of electrical power to facility due to SCE service flicker.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. There was no venting; therefore, no excess emissions.</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>9/20/2011</u> <u>4:55</u> End <u>9/20/2011</u> <u>5:40</u> When Discovered: Date & Time <u>9/20/2011</u> <u>4:55</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation Loss of electrical power to facility due to SCE service outage.</p>		<p>H. Corrective actions taken: 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 #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>9/20/2011</u> <u>10:30</u> End <u>9/21/2011</u> <u>21:30</u> When Discovered: Date & Time <u>9/20/2011</u> <u>10:30</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in.</p>
<p>G. Probable Cause of Deviation Loss of electrical power to facility due to SCE service outage caused by an emergency transformer replacement.</p>		<p>H. Corrective actions taken: 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

Specific Applicable Requirements



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1N1</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></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 #: Attachment 71.1N6</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></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 #: Attachment 71.4N1</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></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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment 74.9N7	D. Frequency of monitoring: Daily
B. Description Stationary Internal Combustion Engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A
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.	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 #: Attachment 74.9N9	D. Frequency of monitoring: Daily
B. Description Stationary Internal Combustion Engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A
C. Method of monitoring: All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.	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 #: Attachment 74.15.1N1	D. Frequency of monitoring: Daily records of fuel use. Biennial source test
B. Description Boilers, Steam Generators, and Process Heaters	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. ARB Method 100 (NOx and CO)
C. Method of monitoring: Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters.	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



**ANNUAL COMPLIANCE CERTIFICATION
SOURCE TEST SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant NOx
C. Measured Emission Rate 13.5 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 1/10/2011

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant CO
C. Measured Emission Rate 180.2 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 1/10/2011

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant NOx
C. Measured Emission Rate 24.2 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 1/18/2011

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant CO
C. Measured Emission Rate 62 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 1/18/2011

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

Permit Specific Conditions



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 1</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 #: PTO 1492 Permit Condition 1 Item 2</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 #: PTO 1492 Permit Condition 1 Item 3</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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 4</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 #: PTO 1492 Permit Condition 1 Item 5</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 #: PTO 1492 Condition 1 Item 6</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>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 1 Item 7</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 #: PTO 1492 Permit Condition 1 Item 8</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 #: PTO 1492 Permit Condition 1 Item 9</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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 2 Section 1 & 4</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></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 #: PTO 1492 Condition 2 Sections 2 & 3</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></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 #: PTO 1492 Condition 3 Sections 1 and 2</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></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 5

General Applicable Requirements



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</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 #: Rule 54.B.1</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 #: 54.B.2</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>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 57.1</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 #: Rule 64.B1</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 #: Rule 64.B2</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>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Crude Oil Production and Separation</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></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>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 #: Rule 71.4.B1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</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></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 #: Rule 71.4.B3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</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></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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.6</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-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>
<p>A. Attachment # or Permit Condition #: Rule 74.10</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 #: Rule 74.11.1</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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.22</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

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



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.1</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></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 #: Rule 74.2</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></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 #: Rule 74.16</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></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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Part 70 General</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 #: PO General</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: 01/01/11 to 12/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Outer Continental Shelf Air Regulations</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 #: 40 CFR Part 68</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Accidental Release Prevention and Risk Management Plans</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 #: 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Protection of Stratospheric Ozone</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>

SECTION 7

Supporting Documentation

AEROS ENVIRONMENTAL, INC.
Summary Of Results

DCOR, LLC
Platform Gilda
4.0 MMBtu/hr Process Heater

Project 092-7267
January 18, 2011
Permit No. 01492

Pollutant	ppm	ppm @ 3% O ₂	lb/hr	lb/MMBtu	Permit Limits
NOx	25.9	24.5	0.05	0.0295	0.14 lb/hr and 30 ppm @ 3% O ₂
	25.6	24.1	0.04	0.0290	
	25.6	24.1	0.04	0.0291	
Mean	25.7	24.2	0.04	0.0292	
CO	71	67	0.08	0.0492	0.32 lb/hr and 400 ppm @ 3% O ₂
	67	63	0.07	0.0462	
	61	57	0.06	0.0422	
Mean	66	62	0.07	0.0459	
Comments: _____					



GAS FIRED BURNER EMISSION TEST

Prepared for:



Dos Cuadras Offshore Resources

PLATFORM GILDA

DATE: 1/10/2011

EQUIPMENT TYPE: Uniflux Heater
MODEL NUMBER: Mobiltherm 600
SERIAL NUMBER: 4302
FGR OUTPUT VALUE: 66%
HEAT MEDIUM SP: 312
HEAT MEDIUM GPM: 4.443

FUEL: Natural Gas
FUEL USE: 33 MCFD
REGULATOR PRES.: 4.50 LBS
STACK TEMP.: 835 F
TESTED BY: Kirk Cormany

EMISSION DATA

RAW DATA

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE
O2	3.7	3.7	3.6	4.0	3.8
NOx	13	14	16	9	13.0
CO	182	173	141	194	172.5

CORRECTED TO 3% O2

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE	LIMITS
O2	3.7	3.7	3.6	4.0	3.8	N/A
*NOx	14	15	17	10	13.5	30
*CO	189	180	146	205	180.2	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-11	1.1	0.0
Feb-11	0.8	0.0
Mar-11	0.7	0.0
Apr-11	0.9	0.0
May-11	2.0	0.0
Jun-11	1.0	0.0
Jul-11	1.0	0.0
Aug-11	1.8	0.0
Sep-11	0.0	25.9
Oct-11	1.3	0.0
Nov-11	0.7	0.0
Dec-11	0.9	0.0
Total	16.0	36.6

HOURS	
Monthly Total	Annual Total
1.1	1.1
0.8	1.9
0.7	2.6
0.9	3.5
2.0	5.5
1.0	6.5
1.0	7.5
1.8	9.3
25.9	35.2
1.3	36.5
0.7	37.2
0.9	38.1

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-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
Jan-11	13	101	3327
Feb-11	59	399	3369
Mar-11	164	1151	3923
Apr-11	91	643	3997
May-11	97	604	3720
Jun-11	12	82	3516
Jul-11	11	70	3540
Aug-11	8	47	3463
Sep-11	6	34	3399
Oct-11	7	45	3367
Nov-11	7	45	3331
Dec-11	25	159	3378
North Crane permit limits		19,250 gal/yr	

GILDA	SOUTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
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
Jan-11	31	188	3496
Feb-11	41	260	3372
Mar-11	119	944	3372
Apr-11	110	672	3592
May-11	62	385	3372
Jun-11	11	81	3212
Jul-11	13	67	3198
Aug-11	19	128	3176
Sep-11	12	74	3129
Oct-11	10	73	3095
Nov-11	13	88	3074
Dec-11	28	188	3147
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-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
Jan-11	974	0.97	11.14
Feb-11	855	0.86	11.14
Mar-11	957	0.96	11.78
Apr-11	896	0.90	11.93
May-11	935	0.94	12.23
Jun-11	921	0.92	12.28
Jul-11	954	0.95	12.29
Aug-11	963	0.96	12.23
Sep-11	937	0.94	12.22
Oct-11	955	0.96	12.26
Nov-11	940	0.94	12.23
Dec-11	962	0.96	12.28

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

Natural Gas Usage Meter 3710

**DCOR, LLC
Platform Gilda HTM Gas (Meter 3710)
2011**

Days	January	February	March	April	May	June	July	August	September	October	November	December
	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF
1	35	29	30	31	30	30	31	31	34	31	31	32
2	36	30	31	30	30	30	31	31	34	31	34	31
3	36	30	31	28	30	30	31	31	33	31	33	32
4	36	30	30	29	30	30	31	31	34	31	32	31
5	35	30	31	28	30	30	31	31	35	31	32	31
6	31	31	31	30	30	30	31	31	33	31	32	32
7	31	30	31	30	38	30	31	31	33	31	31	31
8	31	30	31	30	30	30	31	31	26	31	31	31
9	31	31	32	30	30	31	30	31	33	31	31	31
10	31	31	31	30	32	30	31	34	34	31	31	30
11	31	30	31	30	30	30	31	31	34	31	31	30
12	31	30	31	30	28	31	29	31	34	31	31	31
13	32	31	30	30	30	31	29	31	34	31	31	31
14	31	31	30	30	27	31	30	31	32	32	31	31
15	30	31	30	30	30	32	31	31	12	31	31	31
16	32	31	31	30	29	31	31	30	29	31	31	31
17	32	31	31	31	29	31	31	31	29	32	31	31
18	30	31	31	31	30	31	32	31	31	29	31	31
19	30	31	31	31	29	31	30	31	31	30	31	31
20	31	31	31	31	30	31	31	31	11	30	31	31
21	31	31	31	30	30	31	30	31	30	31	31	31
22	31	31	31	29	30	31	31	31	34	31	31	31
23	31	31	30	29	30	31	31	31	35	31	31	31
24	31	30	34	29	30	31	31	31	35	30	32	31
25	31	30	31	30	30	31	31	31	34	30	32	31
26	31	31	30	30	30	31	31	31	34	30	31	31
27	30	31	31	30	30	31	31	31	34	31	31	31
28	27	30	30	30	30	31	31	31	33	31	31	31
29	30	0	31	30	31	31	31	31	31	31	31	31
30	30	0	31	29	31	31	31	31	31	31	31	31
31	28	0	31		31	31	31	31		30		31
TOTALS	974	855	957	896	935	921	954	963	937	955	940	962

TOTAL FOR YEAR 11249 MCF



Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to M/V Ryan T, Luke, Patrick, Nicholas L, Michael Uhl and Freedom/Kenneth Carl From 1/1/2011- 12/31/2011

Was in compliance with South Coast Air Quality Management District requirements for Ventura County. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by Maxum 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
Oxnard Division
Office (805) 299-1219



Hazen Research, Inc.

4601 Indiana Street
Golden, CO 80403 USA
Tel: (303) 279-4501
Fax: (303) 278-1528

DATE September 7, 2011
PROJ. # 009-479
CTRL # H313/11
REC'D 08/23/11

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

Sample Number: H313/11-1
Sample Identification: Diesel Fuel 08/16/11 OCS Crew Boat Alan T Project #092-7468A

	As Assayed	Normalized
ULTIMATE		
Water, %	<0.001	<0.001
Ash, %	0.008	0.008
Sulfur, %	0.003	0.003
Carbon, %	85.30	86.03
Hydrogen, %	13.8	13.9
Nitrogen, %	0.04	0.04
Oxygen, %*	0.85	0.00
PROXIMATE		
Water, %	<0.001	<0.001
Ash, %	0.008	0.008
Volatile Matter, %	100.00	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	137,663	
Calorific Value, BTU/lb	19,613	
API Gravity	36.8	
Density, g/cc	0.841	
EPA F-Factor @ 68 F, DSCF/MMBTU		9295
EPA F-Factor @ 60 F, DSCF/MMBTU		9156

By:


Gerard H. Cunningham
Fuel Laboratory Manager

* by difference



Petroleum Testing Services, Inc.

Supporting Documentation
PC 1, #4

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

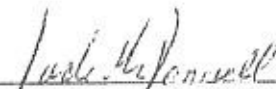
August 29, 2011
Job #: AEI 082311-1
Page: 1 of 1


Lisa Marriott-Smith

Laboratory Report

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

Sample ID	Sulfur, ppm ASTM D7039
DCOR, LLC., August 16, 2011 Location; OCS Crew Boat Alan T, Sample: 12 Unit: Main Engines, Project: 092-7468A Diesel Fuel, PO#: 20411	9


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) 278-1528

DATE September 7 2011
PROJ # 009-479
CTRL # H312/11
REC'D 08/23/11

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

Sample Number H312/11-1
Sample Identification: Diesel Fuel 08/18/11 OCS Supply Boat Ryan T Project #092-/468B

	As Assayed	Normalized
ULTIMATE		
Water %	0.009	0.009
Ash, %	<0.001	<0.001
Sulfur, %	0.012	0.012
Carbon %	87.52	86.16
Hydrogen, %	14.0	13.8
Nitrogen %	0.04	0.04
Oxygen %*	<0.01	0.00
PROXIMATE		
Water %	0.009	0.009
Ash %	<0.001	<0.001
Volatile Matter, %	99.96	99.99
Fixed Carbon, %*	0.03	0.00
Calorific Value BTU/gallon	138,079	
Calorific Value BTU/lb	19,885	
API Gravity	38.6	
Density g/cc	0.832	
EPA F-Factor @ 68 F. DSCF/MMBTU		9153
EPA F-Factor @ 60 F. DSCF/MMBTU		9016

By: 
Gerard H. Cunningham
Fuel Laboratory Manager

* by difference



Petroleum Testing Services, Inc.

Supporting Documentation

PC 1, #4

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

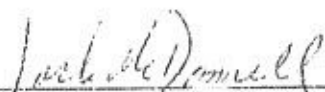
August 29, 2011
Job #: AEI 082311-2
Page: 1 of 1

Lisa Marriott-Smith

Laboratory Report

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

Sample ID	Sulfur, ppm ASTM D7039
DCOR, LLC., August 18, 2011 Location: OCS Supply Boat Ryan T, Sample: 16 Unit: Main Engines, Project: 092-74688 Diesel Fuel, PO#: 20413	7


Analysis Performed by: Jack McDonnell


Report Reviewed by: John Hafen

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Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Jan-11	10,240	2,560	7,680
Feb-11	9,951	2,488	7,463
Mar-11	13,800	3,450	10,350
Apr-11	13,475	3,369	10,106
May-11	10,975	2,744	8,231
Jun-11	9,825	2,456	7,369
Jul-11	9,875	2,469	7,406
Aug-11	10,960	2,740	8,220
Sep-11	10,425	2,606	7,819
Oct-11	11,150	2,788	8,363
Nov-11	10,948	2,737	8,211
Dec-11	12,300	3,075	9,225
2011 Total	33,481	100,443	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Jan-10	122	5	366	15
Feb-10	288	12	863	36
Mar-10	492	21	1477	62
Apr-10	537	22	1612	67
May-10	601	25	1804	75
Jun-10	322	13	966	40
Jul-10	96	4	288	12
Aug-10	157	2	472	20
Sep-10	175	7	524	22
Oct-10	173	7	520	22
Nov-10	214	9	642	27
Dec-10	121	5	364	15
Jan-11	794	33	2381	99
Feb-11	188	8	565	24
Mar-11	648	27	1945	81
Apr-11	875	36	2626	109
May-11	696	29	2087	87
Jun-11	87	4	261	11
Jul-11	340	14	1019	42
Aug-11	411	4	1233	51
Sep-11	569	24	1707	71
Oct-11	134	6	401	17
Nov-11	315	13	945	39
Dec-11	293	12	878	37
2011 Total	5,349	210	16,047	669

	Rolling 12 Mo Total	
	Gina	Gilda
	33,583	98,212
	32,438	96,564
	32,748	97,555
	32,843	97,530
	33,074	98,526
	33,081	98,698
	33,014	98,628
	32,984	98,313
	33,209	98,878
	33,688	99,280
	34,366	100,035
	34,671	100,668
	36,101	104,559
	35,441	104,324
	35,657	106,387
	37,024	110,086
	36,846	109,462
	36,780	109,271
	37,000	109,677
	37,347	111,320
	39,295	112,965
	38,299	113,759
	39,675	115,011
	40,864	117,158

2011 Total 33,481 100,443

2011 Total 5,349 210 16,047 669

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-10	0.56	9.42	0.56	0.13	1.71	1.63	27.55	1.65	0.37	5.01	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	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	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	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	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	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	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	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	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	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	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	1.67	28.24	1.69	0.38	5.13
Jan-11	0.60	10.13	0.60	0.14	1.84	1.73	29.33	1.75	0.39	5.33	1.73	29.33	1.75	0.39	5.33
Feb-11	0.59	9.94	0.59	0.13	1.81	1.73	29.26	1.75	0.39	5.32	1.73	29.26	1.75	0.39	5.32
Mar-11	0.59	10.00	0.60	0.13	1.82	1.76	29.84	1.78	0.40	5.43	1.76	29.84	1.78	0.40	5.43
Apr-11	0.61	10.39	0.62	0.14	1.89	1.82	30.88	1.84	0.41	5.61	1.82	30.88	1.84	0.41	5.61
May-11	0.61	10.34	0.62	0.14	1.88	1.81	30.70	1.83	0.41	5.58	1.81	30.70	1.83	0.41	5.58
Jun-11	0.61	10.32	0.62	0.14	1.88	1.81	30.65	1.83	0.41	5.57	1.81	30.65	1.83	0.41	5.57
Jul-11	0.61	10.38	0.62	0.14	1.89	1.82	30.76	1.84	0.41	5.59	1.82	30.76	1.84	0.41	5.59
Aug-11	0.62	10.48	0.63	0.14	1.90	1.85	31.23	1.86	0.42	5.68	1.85	31.23	1.86	0.42	5.68
Sep-11	0.65	11.02	0.66	0.15	2.00	1.87	31.69	1.89	0.42	5.76	1.87	31.69	1.89	0.42	5.76
Oct-11	0.63	10.74	0.64	0.14	1.95	1.89	31.91	1.91	0.43	5.80	1.89	31.91	1.91	0.43	5.80
Nov-11	0.66	11.13	0.66	0.15	2.02	1.91	32.26	1.93	0.43	5.87	1.91	32.26	1.93	0.43	5.87
Dec-11	0.68	11.46	0.68	0.15	2.08	1.94	32.86	1.96	0.44	5.98	1.94	32.86	1.96	0.44	5.98

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	
Pit Gina	1.40
Pit Gilda	4.20
TPY	23.68
TPY	71.07
TPY	1.41
TPY	4.24
TPY	0.31
TPY	0.95
TPY	4.31
TPY	12.92

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-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
Jan-11	0.00	6.0	2.98	2.98
Feb-11	0.05	5.8	2.88	2.88
Mar-11	2.55	8.2	4.10	4.10
Apr-11	0.10	8.3	4.13	4.13
May-11	0.10	8.3	4.13	4.13
Jun-11	0.00	8.3	4.13	4.13
Jul-11	4.70	10.6	5.28	5.28
Aug-11	0.05	9.9	4.95	4.95
Sep-11	0.05	9.3	4.63	4.63
Oct-11	0.10	9.3	4.63	4.63
Nov-11	0.10	9.3	4.63	4.63
Dec-11	0.05	7.9	3.93	3.93
Permit limit per Platform (gallons/year)			500	500

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 2011**

FACILITY: <u>DCOR, PLATFORM GILDA</u>					PERMIT#: <u>1492</u>		
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)
Tube Fitting	Well Bay #1, Well S-89	03/28/2011 1:00PM	03/28/2011 1:00PM	2,900	N/A	3/28/2011	0
Tube Fitting	Well Bay #1, Well S-61	03/28/2011 1:15PM	03/28/2011 1:15PM	12,000	N/A	3/28/2011	0
Tube Fitting	Well Bay #1, Well S-61	03/28/2011 2:30PM	03/28/2011 2:30PM	6,800	N/A	3/28/2011	0
Hatch	Sub Deck, #1 Waste Water Tank	03/28/2011 4:00PM	03/28/2011 4:00PM	9,800	N/A	3/28/2011	0
Valve - Butterfly	Well Bay #4, Well S-54	03/28/2011 4:50PM	03/28/2011 4:50PM	22,200	N/A	3/28/2011	10
Valve - Casing Wing	Well Bay #4, Well-42	03/28/2011 5:10PM	03/28/2011 5:10PM	1,700	N/A	3/28/2011	0
Valve - Fisher Control	Production Deck, Oil Shipping Tank MBJ804	03/29/2011 9:20AM	03/29/2011 9:20AM	25,000	N/A	3/29/2011	30
Valve - Orifice	Production Deck, V-3 Test Separator #3	03/29/2011 10:15AM	03/29/2011 10:15AM	50,000	N/A	3/29/2011	0
Valve - Manifold	Production Deck, HTM Meter #3710	03/29/2011 11:00AM	03/29/2011 11:00AM	38,000	N/A	3/29/2011	0

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 2nd Quarter of 2011**

FACILITY: <u>DCOR, PLATFORM GILDA</u>					PERMIT#: <u>1492</u>		
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	Well Bay #1, Well S-71 (Well)	06/27/2011	06/27/2011	2,500		6/27/2011	0
Valve - Ball	Well Bay #1, Well S-17 (Reference lines)	06/27/2011	06/27/2011	6,800		6/27/2011	0
Cap	Well Bay #1, Well S-89 (Casing SS Tbg Line)	06/27/2011	06/27/2011	50,000		6/27/2011	0
Tube Fitting	Well Bay #1, Well # S61 (Flowing Well)	06/27/2011	06/27/2011	2,600		6/27/2011	20
Collar	Well Bay #2, Well S-57 (Production Well)	06/27/2011	06/27/2011	4,750		6/27/2011	0
Valve - Shut Down	Compressor #3, Shut Down Valve #20	06/27/2011	06/27/2011	13,000		6/27/2011	3
Valve - Ball	Well Bay #3, Well S-38 (Well Idle)	06/27/2011	06/27/2011	4 DPM	Minor	6/27/2011	0 DPM
Gauge	Well Bay #3, Well S-38 (Well Idle)	06/27/2011	06/27/2011	8,800		6/27/2011	0
Tube Fitting	Compressor #3, Shut Down Valve #20	06/28/2011	06/28/2011	1,800		6/28/2011	0
Tube Fitting	Compressor #3, Shut Down Valve #20	06/28/2011	06/28/2011	2,800		6/28/2011	0
Valve - Orifice	Production Deck, Gas Compressor #3, Shut Down Valve #20	06/28/2011	06/28/2011	30,000		6/28/2011	0
Pig Trap Door	Production Deck, Gas Compressor #3, Shut Down Valve #20	06/28/2011	06/28/2011	26,000		6/28/2011	20

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 3rd Quarter of 2011

CILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of Inspection:	Components	Valves	Others	Pumps	Compres.	PRV's
<u>TVA</u>	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 Rept Rate (ppm)
Tube Fitting	Well Bay #1, Well S-27	09/22/2011 11:00AM	09/22/2011 11:00AM	8,000	N/A	09/22/2011	0
Tube Fitting	Well Bay #1, Well S-61	09/22/2011 9:45AM	09/22/2011 9:45AM	19,000	N/A	09/22/2011	0
Cap	Well Bay #2, S-79	09/22/2011 10:20AM	09/22/2011 10:20AM	2,900	N/A	09/22/2011	0
Tube Fitting	Well Bay #2, S-79	09/22/2011 10:25AM	09/22/2011 10:25AM	8,000	N/A	09/22/2011	0
Valve - Casing Wing	Well Bay #1, S-27	09/22/2011 11:50AM	09/22/2011 11:50AM	20,000	N/A	09/22/2011	50
Valve - Casing Wing	Well Bay #2, S-35	09/22/2011 12:15PM	09/22/2011 12:15PM	15,000	N/A	09/22/2011	20
Valve - Casing Wing	Well Bay #4, S-3	09/22/2011 2:40PM	09/22/2011 2:40PM	30,000	N/A	09/22/2011	15
Valve - Ball	Well Bay #4, S-42	09/22/2011 2:00PM	09/22/2011 2:00PM	3,300	N/A	09/22/2011	0
Tube Fitting	Well Bay #3, S-62	09/22/2011 3:15PM	09/22/2011 3:15PM	6,150	N/A	09/22/2011	0
Valve - Casing Wing	Well Bay #3, S-28	09/22/2011 3:25PM	09/22/2011 3:25PM	50,000	N/A	09/22/2011	200
Hatch	Sub Deck, #1 Waste Water Tank	09/22/2011 4:45PM	09/22/2011 4:45PM	1,340	N/A	09/22/2011	10
Valve	Production Deck, Gas Sales to Pig Launcher	09/26/2011 1:45PM	09/26/2011 1:45PM	20,000	N/A	9/26/2011	0
Tube Fitting	Production Deck, Dot Sales Gas	09/26/2011 9:05AM	09/26/2011 9:05AM	2,300	N/A	9/26/2011	0
Meter	Production Deck, Flare Pilot Gas	09/26/2011 9:45AM	09/26/2011 9:45AM	50,000	N/A	9/26/2011	0

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 4th Quarter of 2011

CILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of Inspection:	Components	Valves	Others	Pumps	Compres.	PRV's
<u>TVA</u>	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	1	0	0	0
	% Leaking:	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 (ppm)
Cap	Well Bay #1, Well S-19	10/24/2011 1:05PM	10/24/2011 1:05PM	2,400	N/A	10/24/2011	0
Valve - Casing Wing	Well Bay #4, Well S-3, Lower Level	10/26/2011 2:55PM	10/26/2011 2:55PM	1,600	N/A	10/26/2011	0
Tube Fitting	Well Bay #4, Well S-2, Lower Level	10/26/2011 3:00PM	10/26/2011 3:00PM	2,300	N/A	10/26/2011	0
Meter	Production Deck, Meter #3702, Sales Gas Meter	10/26/2011 4:15PM	10/26/2011 4:15PM	20,000	N/A	10/26/2011	0
Threaded Connection	Production Deck, K-25, Sales Gas Filter	10/26/2011 6:55PM	10/26/2011 6:55PM	40,000	N/A	10/27/2011	0
Tube Fitting	Well Bay #1, Well S-61	10/26/2011 8:55AM	10/26/2011 8:55AM	8,800	N/A	10/26/2011	0
Valve	Well Bay #1, Well S-75	10/26/2011 9:10AM	10/26/2011 9:10AM	3,800	N/A	10/26/2011	0
Valve - Ball	Well Bay #2, Well S-55	10/26/2011 9:30AM	10/26/2011 9:30AM	6,450	N/A	10/26/2011	0
Tube Fitting	Well Bay #2, Well S-55	10/26/2011 9:45AM	10/26/2011 9:45AM	8,650	N/A	10/26/2011	0
Cap	Well Bay #2, Well S-35	10/26/2011 9:55AM	10/26/2011 9:55AM	3,650	N/A	10/26/2011	0
Tube Fitting	Well Bay #1, Well S-27	10/26/2011 10:20AM	10/26/2011 10:20AM	30,000	N/A	10/26/2011	0
Cap	Well Bay #2, Well S-55, Lower Level	10/26/2011 10:50AM	10/26/2011 10:50AM	8,000	N/A	10/26/2011	0
Tube Fitting	Well Bay #4, Well S-3, Reference Line	10/26/2011 12:45PM	10/26/2011 12:45PM	8,000	N/A	10/26/2011	0
Valve	Production Deck, Gas Sales to Pig Launcher	11/28/2011 10:30AM	11/28/2011 10:30AM	1,185	N/A	12/6/2011	0

**PLATFORM GILDA
FLARE USAGE (MMSCF)**

100 MMBtu/hr Flare

	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMSCF	Planned MMCF
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
Jan-11	23	0.0	2.0	0.3054	1.59
Feb-11	21	0.0	48.0	0.3144	1.63
Mar-11	29	0.0	318.0	0.3318	1.94
Apr-11	32	66.0	8.0	0.3521	1.91
May-11	33	0.0	35.0	0.3711	0.57
Jun-11	33	0.0	7.0	0.3912	0.57
Jul-11	32	5.0	592.0	0.4091	1.14
Aug-11	37	0.0	2442.0	0.4324	3.55
Sep-11	16	0.0	493.0	0.4347	4.03
Oct-11	11	0.0	37.0	0.4320	4.04
Nov-11	2	0.0	24.0	0.4292	4.05
Dec-11	22	0.0	3.1	0.4429	4.01

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 all flaring > 10 minutes. Record H2S ppm.					February-11		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
2/4/11	13:50	13:55	4	0	Platform shutdown PLC at MOSF	UNPLANNED	J H.
2/4/11	16:50	16:55	6	0	Platform start up	UNPLANNED	J H.
2/6/11	11:30	11:32	2	0	Platform shutdown	UNPLANNED	J H.
2/6/11	12:00	12:02	2	0	Gas compressor shutdown	UNPLANNED	J H.
2/7/11	1:36	1:37	1	0	Amine plant shut down	UNPLANNED	J H.
2/8/11	9:00	9:02	1	0	Gas compressor shut down	UNPLANNED	J H.
2/17/11	10:00	10:02	2	0	Power flicker	UNPLANNED	J H.
2/17/11	19:15	19:20	4	0	Partial platform shutdown	UNPLANNED	TS
2/17/11	23:00	23:20	16	0	Partial platform shutdown	UNPLANNED	J H.
2/22/11	16:38	16:40	2	0	Partial platform shutdown	UNPLANNED	TS
2/22/11	17:49	17:54	4	0	Amine plant valve diverted to flare.	UNPLANNED	TS
2/26/11	8:00	8:02	4	0	GC-2 shut down.	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

Record all flaring > 10 minutes. Record H2S ppm.				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		March-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
3/10/11	13:00	13:05	11	0	GAS COMP. SHUT DOWN	UNPLANNED	P.A.
3/11/11	1:00	10:00	286	0	AMINE PLANT SHUT DOWN	UNPLANNED	L.V.
3/12/11	8:00	8:01	3	0	AMINE PLANT SHUT DOWN	UNPLANNED	L.V.
3/15/11	12:30	12:31	2	0	GC-3 SHUT DOWN	UNPLANNED	L.V.
3/15/11	13:45	13:46	2	0	GC-3 SHUTDOWN	UNPLANNED	L.V.
3/16/11	7:45	7:46	6	0	START- UP AND SHUT DOWN GC-3	UNPLANNED	L.V.
3/17/11	11:30	11:31	3	0	START- UP AND SHUT DOWN GC-3	UNPLANNED	F. S.
3/18/11	11:13	11:15	2	0	S-42 & S-57 UNLOADED SHUT DOWN GC-2	UNPLANNED	A.D.
3/21/11	8:07	8:10	2	0	PLANT S/D LOW SHIPPING PUMP PSI	UNPLANNED	A.D.
3/27/11	22:30	22:31	1	0	FLARE PILOT TESTING	UNPLANNED	P.A.

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, not "sweet" or "x"				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		May-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
5/1/11	4:14	4:14	3	0	MOSF received gas pig, Gas comp. s/d on low psi	UNPLANNED	FS
5/3/11	9:36	9:38	3	0	Lost power from MOSF	UNPLANNED	RP
5/14/11	8:16	8:18	2	0	Amine plant S/D	UNPLANNED	TS
5/14/11	9:40	9:42	2	0	Amine plant S/D	UNPLANNED	TS
5/16/11	14:02	14:04	3	0	Main scrubber LSL	UNPLANNED	TS
5/16/11	23:40	23:41	1	0	Amine plant S/D	UNPLANNED	AD
5/20/11	7:20	7:22	5	0	GC-3 S/D due to gas pig	UNPLANNED	JW
5/21/11	1:02	1:03	2	0	GC-3 & Chiller S/D due to gas pig	UNPLANNED	JW
5/26/11	15:23	15:55	3	0	Amine plant S/D	UNPLANNED	BM
5/29/11	2:00	2:05	7	0	Platform shut down due to power flicker	UNPLANNED	FS
5/30/11	14:08	14:10	4	0	Gas Comp. #3 S/D due to high pressure	UNPLANNED	BM

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PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Jul-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
7/6/11	15:30	15:33	9	0	GC-#3 Shut Down	UNPLANNED	L.V.		
7/15/11	15:00	15:01	1	0	Load & Send Oil & Gas Pigs	PLANNED	F.P.		
7/15/11	15:30	15:31	1	0	Load & Send Oil & Gas Pigs	PLANNED	F.P.		
7/15/11	16:00	16:01	1	0	Load & Send Oil & Gas Pigs	PLANNED	F.P.		
7/15/11	16:30	16:31	2	0	Load & Send Oil & Gas Pigs	PLANNED	F.P.		
7/16/11	9:00	9:01	1	0	Checking Flare Pilot Meter	UNPLANNED	F.P.		
7/16/11	12:00	12:01	3	0	Acid Gas Comp. S/D	UNPLANNED	F.P.		
7/16/11	18:00	18:01	3	0	Amine Plant S/D	UNPLANNED	P.A.		
7/19/11	21:03	21:04	1	0	HTM S/D Sent Gas Pig	UNPLANNED	P.A.		
7/19/11	21:04	21:05	1	0	HTM S/D Sent Gas Pig	UNPLANNED	P.A.		
7/27/11	23:00	3:00	382	0	Chiller PSV - MOSF Shut Gas Line	UNPLANNED	A.D.		
7/28/11	18:20	18:23	14	0	GC-#3 Shut Down	UNPLANNED	L.V.		
7/30/11	20:45	22:30	178	0	MOSF Gas Pipeline Shutdown	UNPLANNED	J.W.		

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, not "sweet" or "x"						Aug-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
8/3/11	13:47	13:49	3	0	Acid gas comp. s/d amine plt. s/d	UNPLANNED	P. A.
8/4/11	21:55	22:10	12	0	High psi. on gas line s/d gc.#3	UNPLANNED	J. H.
8/4/11	23:15	0:00	37	0	High psi. on gas line s/d gc.#3	UNPLANNED	J. H.
8/5/11	0:00	6:00	315	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/5/11	20:15	22:15	105	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/6/11	0:00	3:30	184	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/7/11	19:00	23:15	223	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/7/11	1:45	2:45	53	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/8/11	2:45	14:55	590	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/8/11	19:30	0:00	236	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/9/11	0:00	5:00	240	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	J. H.
8/9/11	9:50	17:00	344	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	B. M.
8/9/11	18:45	21:15	96	0	High psi. on gas line s/d gc.#3 wet gas	UNPLANNED	B. M.
8/10/11	3:58	4:03	4	0	Partial Platform Shutdown	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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Sep-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
9/2/11	4:58	5:03	7	0	Power Flicker	UNPLANNED	FS
9/5/11	7:06	7:08	2	0	Amine Plant	UNPLANNED	FS
9/7/11	15:04	15:06	2	0	GC#2 S/D to start GC#3	UNPLANNED	TS
9/8/11	11:30	11:35	11	0	GC#2 S/D low oil diff pressure	UNPLANNED	FP
9/15/11	18:00	18:10	7	0	Starting Platform	UNPLANNED	BM
9/15/11	20:00	20:03	2	0	High PSI on secondary scrubber	UNPLANNED	JH
9/15/11	10:45	11:35	36	0	GC#3 S/D to check th pin to see if it was sheared	UNPLANNED	JH
9/16/11	5:13	5:16	2	0	Vapor comp S/D Amine switch to sweet gas	UNPLANNED	JH
9/17/11	13:53	13:56	3	0	Amine Plant S/D	UNPLANNED	BM
9/17/11	17:11	17:13	2	0	Oil line low PSI	UNPLANNED	BM
9/20/11	5:00	6:00	44	0	Power loss from shore	UNPLANNED	JH
9/20/11	10:30	10:40	7	0	Controlled S/D power loss from shore	UNPLANNED	BM
9/21/11	22:00	0:00	87	0	Bringing platform back on, cant sell gas	UNPLANNED	JH
9/22/11	0:00	9:00	270	0	Bringing platform back on, cant sell gas	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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Sep-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
9/22/11	12:00	12:03	3	0	Amine plant S/D	UNPLANNED	LV	
9/22/11	15:00	15:02	2	0	Amine plant S/D	UNPLANNED	LV	
9/22/11	16:02	16:06	4	0	Amine plant S/D	UNPLANNED	LV	
9/30/11	10:00	10:03	2	0	Amine plant Startup	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

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
10-Jan-11	8:05 - 8:07	James Vanhoy	South Crane	No Visible Emissions
10-Jan-11	9:11 - 9:13	James Vanhoy	HTM Heater	No Visible Emissions
10-Jan-11	11:17 - 11:19	James Vanhoy	North Crane	No Visible Emissions
10-Jan-11	11:55 - 11:57	James Vanhoy	Standby Generator	No Visible Emissions

Platform Gilda 2011 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
1/10/11	2	0.6	0.001	0	0.00	0.000
2/4/11	4	0.6	0.002	0	0.00	0.000
2/4/11	6	0.6	0.004	0	0.00	0.000
2/6/11	2	0.6	0.001	0	0.00	0.000
2/6/11	2	0.6	0.001	0	0.00	0.000
2/7/11	1	0.6	0.001	0	0.00	0.000
2/8/11	1	0.6	0.001	0	0.00	0.000
2/17/11	2	0.6	0.001	0	0.00	0.000
2/17/11	4	0.6	0.002	0	0.00	0.000
2/17/11	16	0.6	0.010	0	0.00	0.000
2/22/11	2	0.6	0.001	0	0.00	0.000
2/22/11	4	0.6	0.002	0	0.00	0.000
2/26/11	4	0.6	0.002	0	0.00	0.000
3/10/11	11	0.6	0.007	0	0.00	0.000
3/11/11	286	0.6	0.172	0	0.00	0.000
3/12/11	3	0.6	0.002	0	0.00	0.000
3/15/11	2	0.6	0.001	0	0.00	0.000
3/15/11	2	0.6	0.001	0	0.00	0.000
3/16/11	6	0.6	0.004	0	0.00	0.000
3/17/11	3	0.6	0.002	0	0.00	0.000
3/18/11	2	0.6	0.001	0	0.00	0.000
3/21/11	2	0.6	0.001	0	0.00	0.000
3/27/11	1	0.6	0.001	0	0.00	0.000
4/13/11	64	0.6	0.038	0	0.00	0.000
4/14/11	3	0.6	0.002	0	0.00	0.000
4/14/11	3	0.6	0.002	0	0.00	0.000
4/16/11	2	0.6	0.001	0	0.00	0.000
4/19/11	2	0.6	0.001	0	0.00	0.000
5/1/11	3	0.6	0.002	0	0.00	0.000
5/3/11	3	0.6	0.002	0	0.00	0.000
5/14/11	2	0.6	0.001	0	0.00	0.000
5/14/11	2	0.6	0.001	0	0.00	0.000
5/16/11	3	0.6	0.002	0	0.00	0.000
5/16/11	1	0.6	0.001	0	0.00	0.000
5/20/11	5	0.6	0.003	0	0.00	0.000
5/21/11	2	0.6	0.001	0	0.00	0.000
5/26/11	3	0.6	0.002	0	0.00	0.000
5/29/11	7	0.6	0.004	0	0.00	0.000
5/30/11	4	0.6	0.002	0	0.00	0.000
6/14/11	2	0.6	0.001	0	0.00	0.000
6/26/11	3	0.6	0.002	0	0.00	0.000
6/27/11	2	0.6	0.001	0	0.00	0.000
7/6/11	9	0.6	0.005	0	0.00	0.000
7/15/11	1	0.6	0.001	0	0.00	0.000
7/15/11	1	0.6	0.001	0	0.00	0.000
7/15/11	1	0.6	0.001	0	0.00	0.000
7/15/11	2	0.6	0.001	0	0.00	0.000
7/16/11	1	0.6	0.001	0	0.00	0.000
7/16/11	3	0.6	0.002	0	0.00	0.000
7/16/11	3	0.6	0.002	0	0.00	0.000
7/19/11	1	0.6	0.001	0	0.00	0.000
7/19/11	1	0.6	0.001	0	0.00	0.000
7/27/11	382	0.6	0.229	0	0.00	0.000
7/28/11	14	0.6	0.008	0	0.00	0.000

Platform Gilda 2011 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
7/30/11	178	0.6	0.107	0	0.00	0.000
8/3/11	3	0.6	0.002	0	0.00	0.000
8/4/11	12	0.6	0.007	0	0.00	0.000
8/4/11	37	0.6	0.022	0	0.00	0.000
8/5/11	315	0.6	0.189	0	0.00	0.000
8/5/11	105	0.6	0.063	0	0.00	0.000
8/6/11	184	0.6	0.110	0	0.00	0.000
8/7/11	223	0.6	0.134	0	0.00	0.000
8/7/11	53	0.6	0.032	0	0.00	0.000
8/8/11	590	0.6	0.354	0	0.00	0.000
8/8/11	236	0.6	0.142	0	0.00	0.000
8/9/11	240	0.6	0.144	0	0.00	0.000
8/9/11	344	0.6	0.206	0	0.00	0.000
8/9/11	96	0.6	0.058	0	0.00	0.000
8/10/11	4	0.6	0.002	0	0.00	0.000
9/2/11	7	0.6	0.004	0	0.00	0.000
9/5/11	2	0.6	0.001	0	0.00	0.000
9/7/11	2	0.6	0.001	0	0.00	0.000
9/8/11	11	0.6	0.007	0	0.00	0.000
9/15/11	7	0.6	0.004	0	0.00	0.000
9/15/11	2	0.6	0.001	0	0.00	0.000
9/15/11	36	0.6	0.022	0	0.00	0.000
9/16/11	2	0.6	0.001	0	0.00	0.000
9/17/11	3	0.6	0.002	0	0.00	0.000
9/17/11	2	0.6	0.001	0	0.00	0.000
9/20/11	44	0.6	0.026	0	0.00	0.000
9/20/11	7	0.6	0.004	0	0.00	0.000
9/21/11	87	0.6	0.052	0	0.00	0.000
9/22/11	270	0.6	0.162	0	0.00	0.000
9/22/11	3	0.6	0.002	0	0.00	0.000
9/22/11	2	0.6	0.001	0	0.00	0.000
9/22/11	4	0.6	0.002	0	0.00	0.000
9/30/11	2	0.6	0.001	0	0.00	0.000
10/24/11	37	0.6	0.022	0	0.00	0.000
11/1/11	2	0.6	0.001	0	0.00	0.000
11/10/11	2	0.6	0.001	0	0.00	0.000
11/17/11	1	0.6	0.001	0	0.00	0.000
11/23/11	19	0.6	0.011	0	0.00	0.000
12/10/11	2	0.6	0.001	0	0.00	0.000
12/22/11	1.11	0.6	0.001	0	0.00	0.000
TOTAL	4080.11		2.45			0.00
TOTAL SULFUR EMISSIONS					2.45	lb SO2
Annual Limits:						
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)						