



290 Maple Court
Suite 290
Ventura, CA 93003
(805) 535-2000

February 9, 2015

Mr. Dan Searcy
Ventura County APCD
669 County Square Drive, Second Floor
Ventura, CA 93003

RE: Annual Compliance Certification Report
Platform Gilda, PTO 1492

Mr. Searcy:

DCOR, LLC, is submitting the enclosed Annual Compliance Verification Report for Platform Gilda as required by Part 70 Permit to Operate 1492. This report covers the time period of January 1, 2014, through December 31, 2014.

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

Sincerely,

Christine White

Christine White
Environmental Advisor

Enclosure

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

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DCOR, LLC

**2014 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

2014

COMPLIANCE VERIFICATION REPORT

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SECTION

1



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: Bob Garcia, VP California Offshore Operations	Date: 2.9.15
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Time Period Covered by Compliance Certification 01 / 01 / 2014 (MM/DD/YY) to 12 / 31 / 2014 (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) Annual NO_x and CO screening Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters 	<ul style="list-style-type: none"> Records of source tests Records of NO_x and CO screenings Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> Fuel type records Fuel use records 	<ul style="list-style-type: none"> Fuel type records Fuel use records 	None	None	Not federally enforceable
40CFR63ZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> Maintenance records Use non-resettable hour meter Annual compliance certification 	<ul style="list-style-type: none"> Maintenance records Hours of operation records 	None	None	
40CFR63ZZZN5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> Initial CO source testing Maintain catalyst pressure / temperature Annual compliance certification 	<ul style="list-style-type: none"> Initial CO testing records 	As specified in Sections 63.6650(c)(1)-(6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives	

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 Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation Maintain a log of crew boats and engines 	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 Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Maintain a log of work boats and engines 	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, 2, and 5	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	

I.c.2. Permit-Specific Conditions (continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC2 - Condition Nos.3 and 4	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	
PO1492PC3 - Condition No. 1	40 CFR Part 63, Subpart ZZZZ RICE MACT 100 hr/yr maintenance and testing limit	<ul style="list-style-type: none"> •Annual compliance certification •Monthly records of maintenance and testing hours 	<ul style="list-style-type: none"> •Monthly records of maintenance and testing hours 	None	None	
PO1492PC3 - Condition No. 2	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. 3	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 307-941, 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 (July 20, 1994) 	
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 	

I.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) 	

I.e.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, 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 Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Abrasive blasting records Maintain VOC records of coatings used 	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

PTO 1492: Platform Gilda

Reporting Period: January 1, 2014 through December 31, 2014

There were five (5) breakdowns filed during this reporting period.

There was one (1) deviation filed.

These are summarized on the following Annual Compliance Certification Deviation Summary

Excess Emissions

Date	NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
5/18 - 5/19/14	0	0	0	3.2508	0	0
5/19/2014	0	0	0	4.4376	0	0
6/19/2014	0	0	0	0.34	0	0
6/24/2014	0	0	0	1.25	0	0
Total	0	0	0	9.278	0	0



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(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>2/6/2014</u> <u>2:50 PM</u> End <u>2/6/2014</u> <u>7:45 PM</u> When Discovered: Date & Time <u>2/6/2014</u> <u>2:50 PM</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 SCE Demand Response Program (Base Interruptible Power) Outage</p>		<p>H. Corrective actions taken: VCAPCD was notified of the outage. All oil and gas production was shut-in during the test.</p>
<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>B. Equipment description: Flare</p>	<p>C. Deviation Period: Date & Time Begin <u>5/18/2014</u> <u>3:00 PM</u> End <u>5/19/2014</u> <u>6:45 AM</u> When Discovered: Date & Time <u>5/18/2014</u> <u>3:00 PM</u></p>
<p>D. Parameters monitored: H2S concentration in flared gas</p>	<p>E. Limit 300 ppm</p>	<p>F. Actual: 1200 ppm</p>
<p>G. Probable Cause of Deviation Mechanical problems with the "vapor" compressor. Produced gas could not be routed to the amine plant to remove H2S.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. A backup "vapor" compressor was installed on 5/19/14.</p>
<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>B. Equipment description: Flare</p>	<p>C. Deviation Period: Date & Time Begin <u>5/19/2014</u> <u>8:30 AM</u> End <u>5/19/2014</u> <u>7:15 PM</u> When Discovered: Date & Time <u>5/19/2014</u> <u>8:30 AM</u></p>
<p>D. Parameters monitored: H2S concentration in flared gas</p>	<p>E. Limit 300 ppm</p>	<p>F. Actual: 1200 ppm</p>
<p>G. Probable Cause of Deviation The backup vapor compressor also experienced mechanical problems.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. Sweet gas was added to the sour gas stream to dilute the H2S concentration. Both vapor compressors were reconditioned.</p>



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>B. Equipment description: Flare</p>	<p>C. Deviation Period: Date & Time Begin <u>6/19/2014</u> <u>7:15 PM</u> End <u>6/20/2014</u> <u>12:00 AM</u> When Discovered: Date & Time <u>6/19/2014</u> <u>7:15 PM</u></p>
<p>D. Parameters monitored: H2S concentration in flared gas</p>	<p>E. Limit 300 ppm</p>	<p>F. Actual: 1200 ppm</p>
<p>G. Probable Cause of Deviation The amine plant, which removes H2S from the gas stream had an upset, and flared gas had an H2S concentration above 300 ppm.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The Amine plant was shut down. The problem originated from a stuck valve, which was manually exercised, and the problem corrected itself.</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>B. Equipment description: Flare</p>	<p>C. Deviation Period: Date & Time Begin <u>6/24/2014</u> <u>7:00 PM</u> End <u>6/25/2014</u> <u>6:45 AM</u> When Discovered: Date & Time <u>6/24/2014</u> <u>7:00 PM</u></p>
<p>D. Parameters monitored: H2S concentration in flared gas</p>	<p>E. Limit 300 ppm</p>	<p>F. Actual: 1200 ppm</p>
<p>G. Probable Cause of Deviation Insufficient dilution of flared sour gas led to a flaring event over 300 ppm lasting longer than one hour.</p>		<p>H. Corrective actions taken: SO2 injection rate was slowly increased, and sweet gas wells were also brought online to dilute the flared sour gas.</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>12/8/2014</u> <u>1:30 AM</u> End <u>12/8/2014</u> <u>11:25 AM</u> When Discovered: Date & Time <u>12/8/2014</u> <u>1:30 AM</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 A power flicker caused the Platform Gilda main electrical breaker to trip resulting in complete shut-down of all oil and gas production facilities, including vapor recovery compressor.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. Platform electrical system reviewed. Vapor recovery compressor was started back up as soon as possible. There was no venting; therefore, no excess emissions.</p>

SECTION	3
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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(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> 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 #: 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> 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 #: 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> 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: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 74.9N7</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></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 74.9N9</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></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 74.15.1N1</p>	<p>D. Frequency of monitoring: Daily records of fuel use; Biennial source test; Annual screening analysis.</p>
<p>B. Description Boilers, Steam Generators, and Process Heaters</p>	<p>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 unflux heater is operating within the normal parameters.</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
SOURCE TEST SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant NOx
C. Measured Emission Rate 29.2 ppm @ 3% O2	D. Limited Emission Rate 30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation Emission Screening Analysis	F. Test Date 4/25/2014

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant CO
C. Measured Emission Rate 169.4 ppm @ 3% O2	D. Limited Emission Rate 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation Emission Screening Analysis	F. Test Date 4/25/2014

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater <i>Note: will next be tested in 2015</i>			B. Pollutant NOx
C. Measured Emission Rate 24.5 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 1/22/2013

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater <i>Note: will next be tested in 2015</i>			B. Pollutant CO
C. Measured Emission Rate 66 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 1/22/2013



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: ATCM Engine N3</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description Air Toxic Control Measure for Stationary Compression Ignition 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: Use of CARB Diesel; Recordkeeping</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 #: 40 CFR 63 ZZZZ N3 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description NESHAP for Stationary RICE, Emergency 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: Change oil filter every 500 hours or annually. Inspect air cleaner every 1,000 hours or annually. Inspect all hoses and belts every 500 hours or annually. Emergency Use operations as specified. Recordkeeping.</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 #: 40 CFR 63 ZZZZ N5 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description NESHAP for Stationary RICE, Non-Emergency 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: Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Crankcase ventilation system. Recordkeeping.</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	4
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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(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 oil well 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: 01/01/14 to 12/31/14
(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> 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 5</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Crew and Work Boat Emission Limits: Rules 26 and 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> 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 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> 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: 01/01/14 to 12/31/14
(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
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Period Covered by Compliance Certification: 01/01/14 to 12/31/14
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<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 2 Section 1, 2, and 5</p>	<p>D. Frequency of monitoring: Daily, 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 #: PTO 1492 Condition 2 Sections 3 and 4</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>



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Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Section 1</p>	<p>D. Frequency of monitoring: Monthly, Annually</p>
<p>B. Description 40 CFR Part 63, Subpart ZZZZ, NESHAPS RICE MACT for Backup Utility Generator</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</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 2 and 3</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 operated less than 200 hours per calendar year, operated during an emergency operation, and/or operated less than 50 hours during maintenance and is therefore exempt from Rule 74.9, "Stationary Internal Combustion Engines."</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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual 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></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 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: Maintain logs recording each flare event. 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></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 #: 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: Maintain logs recording each flare event. 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></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: 01/01/14 to 12/31/14
(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: 01/01/14 to 12/31/14
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<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>



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Period Covered by Compliance Certification: 01/01/14 to 12/31/14
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<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 1,000,000 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: 01/01/14 to 12/31/14
(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
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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(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 inspection 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: 01/01/14 to 12/31/14
(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: 01/01/14 to 12/31/14
(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>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/14 to 12/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</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 and VCAPCD Rules</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
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GAS FIRED BURNER EMISSION TEST

Prepared for:



Dos Cuadras Offshore Resources

PLATFORM GILDA

DATE: 4/25/2014

EQUIPMENT TYPE: Uniflux Heater
 MODEL NUMBER: Mobiltherm 600
 SERIAL NUMBER: 4302
 FGR OUTPUT VALUE: 63%
 HEAT MEDIUM SP: 260
 HEAT MEDIUM GPM: 4.443

FUEL: Natural Gas
 FUEL USE: 35 MCFD
 REGULATOR PRES.: 4.40 LBS
 STACK TEMP.: 845
 TESTED BY: Jesse Vanhoy

EMISSION DATA

RAW DATA

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE
O ₂	0.55	0.60	0.68	0.79	0.7
NO _x	33	32	33	34	33
CO	256	216	166	129	192

CORRECTED TO 3% O₂

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE	LIMITS
O ₂	0.6	0.6	0.7	0.8	0.7	N/A
*NO _x	29	28	29	30	29.2	30
*CO	225	190	147	115	169.4	400

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-14	0.8	0
Feb-14	5	0
Mar-14	1	0
Apr-14	0.8	0
May-14	1	0
Jun-14	0.7	0
Jul-14	0.8	0
Aug-14	0.8	0
Sep-14	0	37.9
Oct-14	0.7	0
Nov-14	0.8	0
Dec-14	2.4	0

HOURS	
Monthly Total	Annual Total
0.8	0.8
5.0	5.8
1.0	6.8
0.8	7.6
1.0	8.6
0.7	9.3
0.8	10.1
0.8	10.9
37.9	48.8
0.7	49.5
0.8	50.3
2.4	52.7

PLATFORM GILDA DIESEL CRANES FUEL USAGE

Supporting Documentation
PC 1

GILDA	NORTH CRANE		
	325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-13	23	165	3578
Feb-13	59	356	3270
Mar-13	36	222	3332
Apr-13	30	181	3415
May-13	24	139	2579
Jun-13	25	162	2317
Jul-13	28	211	2013
Aug-13	22	234	2009
Sep-13	55	319	2209
Oct-13	128	861	3021
Nov-13	112	712	3675
Dec-13	64	444	4005
Jan-14	37	337	4176
Feb-14	125	782	4602
Mar-14	63	415	4795
Apr-14	45	294	4908
May-14	57	395	5164
Jun-14	115	848	5850
Jul-14	169	1246	6886
Aug-14	144	976	7628
Sep-14	90	658	7967
Oct-14	70	468	7574
Nov-14	5.9	377	7239
Dec-14	9.7	671	7466
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE		
	325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-13	46	307	4759
Feb-13	92	578	4876
Mar-13	32	197	4864
Apr-13	24	149	4807
May-13	29	184	4073
Jun-13	22	144	3332
Jul-13	43	274	2935
Aug-13	37	259	2747
Sep-13	41	261	2841
Oct-13	44	278	2999
Nov-13	65	567	3422
Dec-13	80	475	3672
Jan-14	101	578	3944
Feb-14	61	382	3747
Mar-14	51	346	3896
Apr-14	110	697	4444
May-14	137	891	5151
Jun-14	103	643	5650
Jul-14	89	579	5955
Aug-14	44	297	5993
Sep-14	39	262	5994
Oct-14	67	462	6178
Nov-14	8	381	5993
Dec-14	80	577	6095
South Crane permit limits	17,200 gal/yr		

**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-13	1235	1.24	15.06
Feb-13	1140	1.14	15.20
Mar-13	503	0.50	14.76
Apr-13	0	0.00	13.66
May-13	0	0.00	12.43
Jun-13	386	0.39	11.48
Jul-13	1105	1.11	11.40
Aug-13	1010	1.01	11.20
Sep-13	1013	1.01	11.01
Oct-13	1023	1.02	11.03
Nov-13	955	0.96	10.74
Dec-13	969	0.97	10.54
Jan-14	952	0.95	10.29
Feb-14	850	0.85	9.91
Mar-14	946	0.95	9.71
Apr-14	902	0.90	10.11
May-14	914	0.91	11.03
Jun-14	876	0.88	11.90
Jul-14	1061	1.06	12.58
Aug-14	1048	1.05	12.52
Sep-14	966	0.97	12.48
Oct-14	1082	1.08	12.54
Nov-14	1021	1.02	12.54
Dec-14	1016	1.02	12.60

Permit limit, mmscf/yr		36.6

Natural Gas Usage Meter 3710

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

2014

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	30	30	38	31	29	31	35	34	35	35	34
2	31	30	30	30	31	29	31	35	35	34	35	34
3	31	30	30	30	31	22	34	35	33	35	35	34
4	31	30	30	30	31	28	34	35	35	35	35	34
5	31	30	30	30	31	29	34	35	35	35	35	33
6	31	31	30	30	31	29	34	35	35	35	34	33
7	31	31	30	30	31	29	32	33	35	35	34	33
8	31	31	30	30	28	29	36	33	35	35	34	33
9	31	31	30	30	29	29	36	33	35	33	33	33
10	31	31	30	30	29	29	36	33	35	35	31	33
11	31	31	30	30	30	29	36	33	35	33	32	33
12	31	31	30	30	30	28	38	33	35	37	32	33
13	31	30	38	30	29	27	35	33	35	34	34	33
14	31	30	30	30	29	28	35	33	35	34	34	33
15	31	30	30	30	29	28	34	33	35	34	34	33
16	30	30	30	30	29	28	33	33	35	35	34	33
17	30	31	30	30	29	28	35	34	35	35	34	33
18	30	31	30	30	29	28	35	34	35	36	34	32
19	30	31	30	30	29	27	34	34	35	35	34	32
20	30	30	30	29	29	33	34	34	35	35	34	32
21	30	30	30	29	29	31	34	27	35	35	34	32
22	30	30	30	29	29	31	34	35	12	35	35	32
23	31	30	30	30	29	31	34	35	0	35	35	35
24	31	30	30	31	29	30	34	35	0	35	35	32
25	31	30	30	31	29	32	33	35	36	35	35	32
26	31	30	30	31	29	31	34	35	35	36	35	32
27	31	30	30	30	29	31	34	35	46	36	33	32
28	31	30	30	28	29	31	34	33	35	35	34	32
29	31		38	28	29	31	34	33	35	35	34	32
30	30		30	28	29	31	34	34	35	35	34	32
31	30		30	28	29	31	35	33	35	35	34	32
TOTALS	952	850	946	902	914	876	1,061	1,048	966	1,082	1,021	1,016

TOTAL FOR YEAR 11,634 MCF

NOTE: Planned Platform shutdown September 23-24, 2014 for electrical upgrades



Letter of Conformance

January 28, 2015

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to
Dcor from 1/1/2014- 12/31/2014

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. 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
SC Fuels
Oxnard Division
Office (805) 299-1219
bowlesh@scfuels.com



Letter of Conformance

January 26, 2015

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

DCOR LLC FOR M/V RYAN T, LUKE, DANNY C, ADELE ELISE & CAPT T LE FROM 1/1/2014-12/31/2014

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. 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.

Mark Mason

General Manager
Maxum Petroleum
California Division
Office (310) 356-2702



STATIONARY IC EMISSION TEST

PREPARED FOR:



DATE:	April 24, 2014	PLATFORM:	GILDA
QUARTER:	2nd	EQUIPMENT:	SOUTH CRANE
FIELD TECHNICIAN:	JESSE VANHOY	MANUFACTURER:	CATERPILLAR
FUEL TYPE:	#2 DIESEL	MODEL NUMBER :	3406

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1900	1900	1900	1900	
O2	11.8	12.2	12.1	12.0	
CO	49	43	43	45	
NX	1030	976	991	999	LIMIT
<i>CO corrected to %15 O2</i>	32	29	29	30	49
<i>NX corrected to %15 O2</i>	668	662	664	665	

COMMENTS:

Readings were taken post-cat. Temperature: 522°F

Pressure Drop (inches of water column): 2.5" - 3"



STATIONARY IC EMISSION TEST

PREPARED FOR:



DATE:	April 24, 2014	PLATFORM:	GILDA
QUARTER:	2nd	EQUIPMENT:	NORTH CRANE
FIELD TECHNICIAN:	JESSE VANHOY	MANUFACTURER:	CATERPILLAR
FUEL TYPE:	#2 DIESEL	MODEL NUMBER :	3406

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1900	1900	1900	1900	
O2	9.9	10.3	9.6	9.9	
CO	65	56	52	58	
NX	1610	1617	1597	1608	LIMIT
<i>CO corrected to %15 O2</i>	35	31	27	31	49
<i>NX corrected to %15 O2</i>	864	900	834	866	

COMMENTS:

Readings were taken post-cat. Temperature: 618°F

Pressure Drop (inches of water column): 3.5"

PLATFORM GILDA
ENGINE MAINTENANCE
40 CFR Part 63, Subpart ZZZZ

Change Oil and Filter every 500 hours of operation or annually, whichever comes first
Inspect Air Cleaner every 1,000 hours of operation or annually, whichever comes first
Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first

Gilda North Crane

Oil / Filter Change	12/28/2013	3/23/2014	11/14/2014
Air Cleaner Inspection	12/28/2013	3/23/2014	11/14/2014
Belt / Hose Inspection	12/28/2013	3/23/2014	11/14/2014

Gilda South Crane

Oil / Filter Change	12/28/2013	7/2/2014	11/14/2014
Air Cleaner Inspection	12/28/2013	7/2/2014	11/14/2014
Belt Hose Inspection	12/28/2013	7/2/2014	11/14/2014

Gilda Emergency Generator

Oil / Filter Change	12/28/2013	9/7/2014
Air Cleaner Inspection	12/28/2013	9/7/2014
Belt Hose Inspection	12/28/2013	9/7/2014

Note: Inspections of air cleaner and belt hose includes replacement.

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
Jan-13	9,100	2,275	6,825
Feb-13	8,400	2,100	6,300
Mar-13	10,200	2,550	7,650
Apr-13	8,875	2,219	6,656
May-13	10,592	2,648	7,944
Jun-13	11,400	2,850	8,550
Jul-13	11,770	2,943	8,828
Aug-13	12,976	3,244	9,732
Sep-13	11,475	2,869	8,606
Oct-13	12,600	3,150	9,450
Nov-13	12,250	3,063	9,188
Dec-13	11,850	2,963	8,888
Jan-14	11,550	2,888	8,663
Feb-14	9,325	2,331	6,994
Mar-14	9,390	2,348	7,043
Apr-14	6,805	1,701	5,104
May-14	5,803	1,451	4,352
Jun-14	10,153	2,538	7,615
Jul-14	13,206	3,302	9,905
Aug-14	9,075	2,269	6,806
Sep-14	12,300	3,075	9,225
Oct-14	14,685	3,671	11,014
Nov-14	14,000	3,500	10,500
Dec-14	14,850	3,713	11,138
2014 Total	32,786	98,357	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Jan-13	0	0	0	0
Feb-13	875	36	2,615	109
Mar-13	656	27	1,967	82
Apr-13	1,433	60	4,298	179
May-13	1,707	71	5,122	213
Jun-13	2,618	109	7,854	327
Jul-13	866	36	2,598	108
Aug-13	1,239	12	3,718	155
Sep-13	1,521	63	4,562	190
Oct-13	2,089	87	6,266	261
Nov-13	1,895	79	5,686	237
Dec-13	1,659	69	4,976	207
Jan-14	1,918	80	5,755	240
Feb-14	2,086	87	6,259	261
Mar-14	2,280	95	6,841	285
Apr-14	1,880	78	5,641	235
May-14	2,957	123	8,872	370
Jun-14	3,010	125	9,030	376
Jul-14	1,925	80	5,774	241
Aug-14	1,399	58	4,197	175
Sep-14	5,264	219	9,745	406
Oct-14	2,075	86	6,222	259
Nov-14	3,652	152	10,956	457
Dec-14	3,674	153	11,023	459
2014 Total	32,122	1,338	90,316	3,763

	Rolling 12 Mo Total	
	Gina	Gilda
Jan-13	51,990	144,910
Feb-13	48,265	140,244
Mar-13	51,229	140,210
Apr-13	49,198	141,426
May-13	46,512	137,578
Jun-13	47,046	141,221
Jul-13	45,020	135,144
Aug-13	45,546	134,420
Sep-13	45,420	136,370
Oct-13	49,009	141,697
Nov-13	50,205	146,625
Dec-13	53,064	150,346
Jan-14	56,247	158,178
Feb-14	59,637	162,668
Mar-14	57,477	167,138
Apr-14	58,244	166,985
May-14	58,895	167,299
Jun-14	60,175	167,589
Jul-14	61,234	171,975
Aug-14	59,971	169,548
Sep-14	64,618	175,566
Oct-14	65,475	177,084
Nov-14	68,147	183,886
Dec-14	70,163	192,435

Platform Gina Permitted Fuel Total: 84,400
 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	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO		
	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY		
Jan-13	0.86	14.58	0.87	0.19	2.65	2.40	40.65	2.43	0.54	7.39		
Feb-13	0.80	13.54	0.81	0.18	2.46	2.32	39.34	2.35	0.53	7.15		
Mar-13	0.85	14.37	0.86	0.19	2.61	2.32	39.33	2.35	0.53	7.15		
Apr-13	0.82	13.80	0.82	0.18	2.51	2.34	39.67	2.37	0.53	7.21		
May-13	0.77	13.05	0.78	0.17	2.37	2.28	38.59	2.30	0.52	7.02		
Jun-13	0.78	13.20	0.79	0.18	2.40	2.34	39.61	2.37	0.53	7.20		
Jul-13	0.75	12.63	0.75	0.17	2.30	2.24	37.91	2.26	0.51	6.89		
Aug-13	0.75	12.78	0.76	0.17	2.32	2.23	37.70	2.25	0.50	6.86		
Sep-13	0.75	12.74	0.76	0.17	2.32	2.26	38.25	2.28	0.51	6.95		
Oct-13	0.81	13.75	0.82	0.18	2.50	2.35	39.75	2.37	0.53	7.23		
Nov-13	0.83	14.08	0.84	0.19	2.56	2.43	41.13	2.46	0.55	7.48		
Dec-13	0.88	14.88	0.89	0.20	2.71	2.49	42.17	2.52	0.56	7.67		
Jan-14	0.93	15.78	0.94	0.21	2.87	2.62	44.37	2.65	0.59	8.07		
Feb-14	0.99	16.73	1.00	0.22	3.04	2.70	45.63	2.72	0.61	8.30		
Mar-14	0.95	16.12	0.96	0.22	2.93	2.77	46.88	2.80	0.63	8.52		
Apr-14	0.97	16.34	0.98	0.22	2.97	2.77	46.84	2.80	0.63	8.52		
May-14	0.98	16.52	0.99	0.22	3.00	2.77	46.93	2.80	0.63	8.53		
Jun-14	1.00	16.88	1.01	0.23	3.07	2.78	47.01	2.81	0.63	8.55		
Jul-14	1.01	17.18	1.03	0.23	3.12	2.85	48.24	2.88	0.64	8.77		
Aug-14	0.99	16.82	1.00	0.22	3.06	2.81	47.56	2.84	0.64	8.65		
Sep-14	1.07	18.13	1.08	0.24	3.30	2.91	49.25	2.94	0.66	8.95		
Oct-14	1.09	18.37	1.10	0.25	3.34	2.94	49.67	2.97	0.66	9.03		
Nov-14	1.13	19.12	1.14	0.26	3.48	3.05	51.58	3.08	0.69	9.38		
Dec-14	1.16	19.68	1.18	0.26	3.58	3.19	53.98	3.22	0.72	9.81		

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

**Platforms Gina and Gilda Crew and Supply Boats
2014
Log of Boats Operating**

The following crew and supply boats operated at Platform Gina and Platform Gilda

Crew Boats:

Luke
Capt T Le

Supply Boats:

Ryan T
Capt T Le
Danny C
Adele Elise

Boat Engines:

Ryan T
4 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Luke
3 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Cap T Le
3 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Danny C
2 - 360 BHP Diesel Main Engines, Caterpillar 3406C
1 - 30 BHP Diesel Generator Engine, Shibaura M20CRW2
1 - 47 BHP Diesel Generator Engine, Isuzu 4JB1
1 - 45 BHP Winch engine, Detroit 2-71

Adele Elise
2 - 2,000 BHP Diesel Main Engines, Caterpillar 3516
2 - 112 BHP Diesel Generator Engines, John Deere 4045TF275D
1 - 660 BHP Diesel Bow Thruster Engine, Cummins QSK19-M

**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	Gasoline	Gina 50%	Gilda 50%
	gal	gal	gal	gal
Jan-13	0.10	4.8	2.38	2.38
Feb-13	0.10	4.8	2.38	2.38
Mar-13	0.10	4.8	2.38	2.38
Apr-13	0.10	4.8	2.38	2.38
May-13	0.00	4.8	2.38	2.38
Jun-13	0.05	4.8	2.40	2.40
Jul-13	0.00	2.9	1.45	1.45
Aug-13	0.00	0.7	0.33	0.33
Sep-13	0.00	0.5	0.25	0.25
Oct-13	0.00	0.5	0.25	0.25
Nov-13	0.00	0.5	0.25	0.25
Dec-13	0.00	0.5	0.23	0.23
Jan-14	0.00	0.4	0.18	0.18
Feb-14	0.00	0.3	0.13	0.13
Mar-14	0.00	0.2	0.08	0.08
Apr-14	0.00	0.1	0.03	0.03
May-14	0.00	0.1	0.03	0.03
Jun-14	0.00	0.0	0.00	0.00
Jul-14	0.00	0.0	0.00	0.00
Aug-14	0.00	0.0	0.00	0.00
Sep-14	0.00	0.0	0.00	0.00
Oct-14	0.00	0.0	0.00	0.00
Nov-14	0.00	0.0	0.00	0.00
Dec-14	0.00	0.0	0.00	0.00
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 physically located on Platform Gilda.
Fuel use split 50/50 between Platforms Gina and Gilda.

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
 Report for the 1st Quarter of 2014

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)
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No Reportable Leaks for this Quarter
Inspection on 03/04/2014

VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 2nd Quarter of 2014

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)
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No Reportable Leaks for this Quarter
Inspection on 04/22/2014

VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 3rd Quarter of 2014

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)
No Reportable Leaks for this Quarter							
Inspection on 09/11/2014							

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 4th Quarter of 2014**

FACILITY: DCOR, PLATFORM GLEDA						PERMIT#: 149Z
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)
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**No Reportable Leaks for this Quarter
 Inspection on 10/30/2014**

Monthly Flare Logs
Supporting Documentation
PC2
Rule 54.B1, 54.B2

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						January-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
1/7/14	8:50	9:20	5.2	1650	Planned mechanical seal packing change-out.	Planned	F.S.
1/7/14	9:21	12:40	34.8	250	Planned mechanical seal packing change-out.	Planned	F.S.
1/18/14	23:30	23:36	4	0	LSL Alarm on Final Scrubber	Unplanned	J.H.
1/21/14	14:30	14:32	1	0	Amine System Upset.	Unplanned	R.T.
1/21/14	1:00	1:06	4	0	Amine System Upset	Unplanned	J.H.
1/22/14	8:56	8:57	1	0	Amine System Upset.	Unplanned	R.T.
1/25/14	1:01	1:04	3	0	Oil Line PSL Alarm	Unplanned	J.W.
1/31/14	8:50	9:15	16	0	GC#3 S/D to isolate Final Scrubber and install level switch	Planned	J.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.						February-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
2/6/14	20:00	20:03	6	0	Platform Start-up	Unplanned	L.V.
2/13/14	14:00	14:05	9	0	GC-#3 S/D due to Low Oil Pressure - Installed New Pump	Unplanned	R.T.
2/17/14	12:23	12:40	2	0	Amine Plant S/D - Upset	Unplanned	R.T.
<p>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.</p>							

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					March-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
3/2/14	11:30	11:32	2	0	Amine System & Vapor compressor S/D	Unplanned	FS
3/3/14	15:34	15:38	3	0	Repaired vapor compressor oil leak	Unplanned	AD
3/27/14	15:00	15:02	1	0	Switching Gas Compressors	Unplanned	JH
<p>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.</p>							

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		April-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
4/3/14	9:24	9:26	8	0	Unplanned Partial Platform S/D	Unplanned	J.W.		
4/10/14	11:45	11:49	4	0	GC-#3 S/D	Unplanned	J.S		
4/14/14	8:55	8:58	4	0	Switching Gas Compressors	Planned	J.S		
4/16/14	12:22	12:25	5	0	Switching Gas Compressors	Planned	J.S.		
4/23/14	10:40	10:42	2	0	Unplanned Partial Platform S/D	Unplanned	L.V.		
4/25/14	10:00	10:10	6	0	MOSF Gas Line SDV S/I	Unplanned	J.H.		
4/28/14	16:20	24:00	356	0	MOSF Gas Line SDV S/I	Unplanned	R.T.		
4/29/14	0:00	24:00	1143	0	MOSF Gas Line SDV S/I	Unplanned	A.D.		
4/30/14	0:00	24:00	991	0	MOSF Gas Line SDV S/I	Unplanned	A.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

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		May-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
5/1/14	0:00	13:15	537	0	MOSF Gas Line SDV S/I	Unplanned	A.D.
5/15/14	12:03	12:04	1	0	Gas Compressor #3 shut down	Unplanned	J.W.
5/18/14	15:00	23:59	25	1200	Vapor compressor down	Unplanned	J.W.
5/19/14	0:00	6:45	10	1000	Vapor compressor down	Unplanned	B.M.
5/19/14	8:26	24:00	63.7	800	Shut down vapor compressor to install new compressor	Unplanned	B.M.
5/20/14	0:00	24:00	212.8	53	Vapor compressor down	Unplanned	B.M.
5/21/14	0:00	24:00	216.8	50	Vapor compressor down	Unplanned	B.M.
5/22/14	0:00	24:00	144.8	177	Vapor compressor down	Unplanned	J.H.
5/23/14	0:00	24:00	341.7	61	Vapor compressor down	Unplanned	J.H.
5/24/14	0:00	24:00	304.8	62	Vapor compressor down	Unplanned	J.H.
5/25/14	0:00	24:00	299.7	86	Vapor compressor down	Unplanned	J.H.
5/26/14	0:00	24:00	384.8	63	Vapor compressor down	Unplanned	J.H.
5/26/14	20:00	20:05	5	0	Partial Platform Shut Down due to Power Flicker	Unplanned	J.H.
5/27/14	0:00	24:00	443.8	81	Vapor compressor down	Unplanned	J.H.
5/28/14	0:00	24:00	368.8	183	Vapor compressor down	Unplanned	J.H.
5/29/14	0:00	24:00	334.7	223	Vapor compressor down	Unplanned	J.W.
5/30/14	0:00	24:00	210.8	259	Vapor compressor down	Unplanned	J.W.
5/31/14	0:00	24:00	327.8	160	Vapor compressor down	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.		Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S				June-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
6/1/2014	0:00	24:00	399.8	65	Vapor Compressor Down	Unplanned	A.D.
6/2/2014	0:00	24:00	253.8	85	Vapor Compressor Down	Unplanned	A.D.
6/3/2014	0:00	24:00	177	72	Vapor Compressor Down	Unplanned	A.D.
6/4/2014	0:00	24:00	196.8	60	Vapor Compressor Down	Unplanned	A.D.
6/5/14	0:00	24:00	324.8	70	Vapor Compressor Down	Unplanned	A.D.
6/6/14	10:00	10:10	5	0	Platform Partial S/D - Fire Eyes not Bypassed	Unplanned	J.H.
6/6/14	15:10	15:13	2	0	K.O. Drum PSH - Platform Partial S/D	Unplanned	J.H.
6/6/14	0:00	23:59	376.4	65	Vapor Compressor Down	Unplanned	A.D.
6/7/14	8:00	8:10	3	0	Amine Plant Upset	Unplanned	J.H.
6/7/14	0:00	24:00	429.8	100	Vapor Compressor Down	Unplanned	A.D.
6/8/14	0:00	24:00	197.7	85	Vapor Compressor Down	Unplanned	A.D.
6/9/14	10:07	10:12	3	0	Switching Gas Compressors	Unplanned	J.H.
6/9/14	13:38	13:43	3	0	Switching Gas Compressors	Unplanned	J.H.
6/9/14	13:53	13:58	3	0	Amine Plant Upset	Unplanned	J.H.
6/9/14	0:00	24:00	265.8	100	Vapor Compressor Down	Unplanned	A.D.
6/10/14	9:15	9:19	6	0	MOSF Gas Line S/I	Unplanned	J.H.
6/10/14	0:00	24:00	366.8	58	Vapor Compressor Down	Unplanned	A.D.
6/11/14	12:30	17:00	124	0	Vapor Compressor Down	Unplanned	J.H.
6/11/14	0:00	24:00	300.9	60	Vapor Compressor Down	Unplanned	A.D.
6/12/14	0:00	24:00	397.9	68	Vapor Compressor Down	Unplanned	B.M.
6/13/14	0:00	24:00	451.8	65	Vapor Compressor Down	Unplanned	B.M.
6/14/14	0:00	24:00	404.7	90	Vapor Compressor Down	Unplanned	B.M.
6/15/14	0:00	24:00	437.8	93	Vapor Compressor Down	Unplanned	B.M.
6/16/14	0:00	24:00	485.8	72	Vapor Compressor Down	Unplanned	B.M.
6/17/14	0:00	24:00	468.5	115	Vapor Compressor Down	Unplanned	B.M.
6/18/14	0:00	24:00	487.5	155	Vapor Compressor Down	Unplanned	B.M.
6/19/14	0:00	24:00	322.8	180	Vapor Compressor Down	Unplanned	J.S./F.S.
6/19/14	19:15	24:00	137.8	530	Amine Plant Upset/HTM Linkage Worn	Unplanned	F.S.
6/20/14	7:10	12:30	196	0	HTM - Linkage Worn	Unplanned	F.S.
6/20/14	0:00	24:00	381.6	243	Vapor Compressor Down	Unplanned	F.S.
6/21/14	0:00	24:00	400.6	135	Vapor Compressor Down	Unplanned	F.S.
6/22/14	0:00	24:00	458.2	138	Vapor Compressor Down - PLC #1 S/D Pit Partial S/D 1Hr	Unplanned	F.S.
6/23/14	0:00	24:00	269.1	68	Vapor Compressor Down/Amine Plant Upset	Unplanned	F.S.

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						June-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
6/24/14	0:00	24:00	266.4	293	Vapor Compressor Down	Unplanned	F.S.
6/25/14	0:00	24:00	342.3	269	Vapor Compressor Down	Unplanned	L.V.
6/26/14	0:00	24:00	245.8	125	Vapor Compressor Down	Unplanned	L.V.
6/27/14	0:00	24:00	310.8	130	Vapor Compressor Down	Unplanned	L.V.
6/28/14	0:00	24:00	257.8	299	Vapor Compressor Down	Unplanned	L.V.
6/29/14	0:00	24:00	376.8	160	Vapor Compressor Down	Unplanned	L.V.
6/30/14	0:00	24:00	293.8	260	Vapor Compressor Down	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 H2S ppm.						July-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
7/1/14	0:00	24:00	329.8	150	Vapor Compressor S/D	Unplanned	LV
7/2/14	0:00	24:00	335.8	260	Vapor Compressor S/D	Unplanned	LV
7/3/14	0:00	24:00	333.8	169	Vapor Compressor S/D	Unplanned	JH / FS
7/4/14	12:58	13:02	4	0	Platform Partial S/D	Unplanned	FS
7/4/14	0:00	24:00	388.8	150	Vapor Compressor S/D	Unplanned	JH
7/5/14	0:00	24:00	393.7	110	Vapor Compressor S/D	Unplanned	JH
7/6/14	0:00	24:00	334.8	158	Vapor Compressor S/D	Unplanned	JH
7/7/14	0:00	24:00	313.8	181	Vapor Compressor S/D	Unplanned	JH
7/8/14	0:00	24:00	250	182	Vapor Compressor S/D	Unplanned	JH
7/8/14	4:00	24:00	73	106	Wheel Valve Open to Flare @ Well Clean Tank	Unplanned	JH
7/9/14	0:00	24:00	240.8	62	Vapor Compressor S/D	Unplanned	JH
7/10/14	0:00	24:00	263.7	85	Vapor Compressor S/D	Unplanned	JW
7/11/14	0:00	13:00	185.7	78	Vapor Compressor S/D	Unplanned	JW
7/13/14	14:06	14:08	3	0	Platform S/D - Electrician Working on PLC5	Unplanned	D.E.

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			August-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
8/2/14	14:23	14:24	2	0	Switching Gas Compressor	Unplanned	A.D		
8/3/14	16:30	16:33	2	0	Amine Plant Alarm	Unplanned	A.D		
8/10/14	5:20	5:22	3	0	Partial Platform S/D	Unplanned	L.V		
8/11/14	11:20	11:22	4	0	Partial Platform S/D	Unplanned	J.W		
8/19/14	8:45	24:00	159	5	Change out vapor compressor	Planned	F.S		
8/20/14	0:00	12:20	125	0	Change out vapor compressor	Planned	J.S		
8/26/14	16:21	16:23	3	0	GC#3 S/D	Unplanned	J.W		

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PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						September-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
9/2/14	8:15	12:30	166	80	Change Out vapor compressor	Planned	r.t.
9/11/14	9:30	12:45	34	80	Change Compressor Seal	Planned	f.s.
9/20/14	14:15	14:18	3	0	Partial Platform Shut-Down	Unplanned	t.s.
9/27/14	17:30	19:30	112	0	MOSF Gas Line Shut-In	Unplanned	r.t.
9/29/14	8:30	8:36	4	0	Partial Platform Shut-Down	Unplanned	j.s.

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PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					October-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/2/14	4:48	5:00	4	0	Power Flicker	Unplanned	R.T.
10/3/14	13:30	10:30	250	0	Gas Line S/I	Unplanned	B.M.
10/10/14	10:50	10:55	5	0	Seal Drum LSH / Shipping Tank LSL	Unplanned	J.C.
10/19/14	9:05	9:07	2	0	Platform S/D - Electrical Work	Unplanned	L.V.
10/22/14	16:30	16:32	2	0	Partial Platform Shut-Down False Fire Detect in PDM	Unplanned	L.V.

Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S

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.					November-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
11/12/14	14:45	14:47	2	0	Vapor Compressor Shut-Down	Unplanned	J.C
11/13/14	23:50	23:52	2	0	Amine Plant S/D	Unplanned	B.M
11/15/14	1:14	1:21	11	0	Partial Platform Shut-Down	Unplanned	B.M
11/22/14	7:35	7:40	2	0	MOSF Power Flicker	Unplanned	A.D

Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S

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.					December-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
12/1/14	21:15	20:20	10	0	GC-#3 S/D	Unplanned	JW
12/8/14	13:00	13:03	4	0	Platform Start up Op's	Unplanned	FS
12/8/14	1:50	2:30	8	0	Full Platform S/D - From Shore Power	Unplanned	AD
12/14/14	15:22	15:24	3	0	GC-#2 S/D	Unplanned	JW
12/19/14	20:30	21:00	16	0	PSHL K.O. Drum Partial Platform S/D	Unplanned	FS
12/20/14	7:27	7:30	1	0	Faulty Sensor in PDM	Unplanned	FS
12/23/14	8:21	8:31	5	0	Partial Platform S/D - Secondary Scrubber PSHL	Unplanned	JH
12/23/14	21:37	21:40	2	0	GC-#2 S/D (AMPS)	Unplanned	FS
12/24/14	3:20	3:25	3	0	Fire Detection Relay - PDM	Unplanned	FS
12/26/14	4:00	8:50	369	0	Gas Line S/I @ MOSF - Low Temp	Unplanned	BM
12/27/14	3:30	8:00	344	0	Gas Line S/I @ MOSF - Low Temp	Unplanned	BM
12/29/14	7:00	9:00	191	0	Gas Line S/I @ MOSF - Low Temp	Unplanned	JW
12/31/14	13:30	14:00	32	0	PLC5 Acid Gas Comp S/D - Electrical	Unplanned	AD
12/31/14	15:00	19:00	420	0	PLC5 Acid Gas Comp S/D - Electrical	Unplanned	AD

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PLATFORM GILDA
Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
24-Apr-14	13:00-13:03	Jesse Vanhoy	Standby Generator	No Visible Emissions
24-Apr-14	13:15-13:18	Jesse Vanhoy	HTM Heater	No Visible Emissions
24-Apr-14	13:23-13:26	Jesse Vanhoy	Flare	No Visible Emissions
24-Apr-14	13:48-13:51	Jesse Vanhoy	South Crane	No Visible Emissions
24-Apr-14	14:51-14:44	Jesse Vanhoy	North Crane	No Visible Emissions

**PLATFORM GILDA
FLARE USAGE
100 MMBtu/hr Flare**

				12 Month 'Rolling' Total	
	Pilot MCF	Planned MCF	Unplanned MCF	Pilot MMSCF	Planned MMCF
Jan-13	21	0.0	12.0	0.5909	0.12
Feb-13	19	0.0	16.0	0.5893	0.12
Mar-13	21	0.0	2633.0	0.5804	0.12
Apr-13	21	0.0	0.0	0.5691	0.12
May-13	31	0.0	0.0	0.5676	0.12
Jun-13	21	0.0	79.0	0.5552	0.12
Jul-13	23	0.0	67.0	0.5465	0.12
Aug-13	21	198.0	29.0	0.5311	0.28
Sep-13	22	0.0	499.0	0.5369	0.21
Oct-13	22	0.0	13.0	0.5475	0.20
Nov-13	21	0.0	108.0	0.5665	0.20
Dec-13	22	26.0	131.0	0.5671	0.22
Jan-14	22	56.0	13.0	0.5658	0.28
Feb-14	20	0.0	17.0	0.5671	0.28
Mar-14	22	0.0	6.0	0.5735	0.28
Apr-14	21	9.0	2510.0	0.5647	0.29
May-14	23	0.0	4233.0	0.5562	0.29
Jun-14	22	0.0	10832.4	0.5484	0.29
Jul-14	29	0.0	3450.7	0.5397	0.29
Aug-14	17	284.0	14.0	0.5216	0.38
Sep-14	22	200.0	119.0	0.5218	0.58
Oct-14	23	0.0	263.0	0.5245	0.58
Nov-14	22	0.0	17.0	0.5263	0.58
Dec-14	24	0.0	1408.0	0.5287	0.55

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

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

	HOURS	
	Non-Emergency	Emergency
Jan-14	0.8	0
Feb-14	5	0
Mar-14	1	0
Apr-14	0.8	0
May-14	1	0
Jun-14	0.7	0
Jul-14	0.8	0
Aug-14	0.8	0
Sep-14	0	37.9
Oct-14	0.7	0
Nov-14	0.8	0
Dec-14	2.4	0

HOURS	
Monthly Total	Annual Total
0.8	0.8
5.0	5.8
1.0	6.8
0.8	7.6
1.0	8.6
0.7	9.3
0.8	10.1
0.8	10.9
37.9	48.8
0.7	49.5
0.8	50.3
2.4	52.7