

H.B. Case No.:	<u>205-29-I/201530-R</u>
Petitioner:	<u>Exxon Mobil</u>
Permit No.:	<u>5651</u>
Date Rec'd:	<u>9/28/15</u>
Time Rec'd:	<u>13:41</u>
Filing Fee Paid:	<u>\$ 1,148.00</u>

PETITION FOR VARIANCE

Type of Variance Requested:

Emergency _____ Interim¹ x 90-Day _____ Regular x

Length of Variance Requested: Start Date 9/30/2015

End Date 9/29/2016

¹ A 90-Day or Regular Variance must be filed concurrently with an Interim Variance

1. PETITIONER INFORMATION

A. Please provide the name, address and phone number of the Petitioner.

Name: ExxonMobil Production Company
(a division of Exxon Mobil Corporation)

Address: P. O. Box 4358
Houston, TX 77210-4358

Phone Number: (281) 654-6317

B. Please provide the name, address and phone number of the person authorized to receive correspondence regarding this Petition if different from response in 1.A.

Name: Mr. Kartik Garg

Address: 12000 Calle Real
Goleta, CA 93117

Phone Number: (805) 961-4078

C. The Petitioner is (please check one):

- 1) An Individual ()
- 2) Partnership ()
- 3) Corporation (X)
- 4) Public Agency ()
- 5) Other Entity (please describe)

2. Location of equipment for which the variance is requested if different from response in 1.A.

The equipment is located at ExxonMobil's Las Flores Canyon oil and gas processing plant. The plant is approximately 25 miles northwest of Santa Barbara, California.

3. List any District permits that are applicable to the equipment subject to this variance request.

PTO and Part 70 Operating Permit 5651

4. Briefly describe the equipment that is the subject of this Petition.

The onshore facilities receive the produced crude/water/gas emulsion from the offshore platforms via the 20-inch emulsion pipeline and produced gas from the platforms via the POPCO transportation system. The onshore facilities produce oil, propane, butane, and sulfur products for sale and fuel quality gas for process needs and power generation of process heat and electricity. The facilities are divided in the following areas: the Oil Treating Plant, Produced Water Treating System, Transportation Terminal, Stripping Gas Treating Plant and Cogeneration Power Plant. The LFC Continuous Emission Monitoring system (CEMs) has been designed to provide continuous monitoring data to the SBCAPCD Central Data Acquisition System (CDAS) to facilitate enforcement of permit conditions. The program is described in detail in the SBCAPCD-approved LFC CEMS monitoring plan which is incorporated by reference in the operating permit for the facility.

5. FINDINGS REQUIRED FOR THE GRANTING OF A VARIANCE

In order for the Hearing Board to grant a variance to a Petitioner authorizing the operation of a source in violation of any rule, regulation or order of the District, the Hearing Board is required to make "findings" in accordance with the requirements specified in California Health and Safety Code §42352, et. seq. and District rules and regulations. The Hearing Board's variance decision will take into consideration information you provide in this Petition. Please ensure your responses are complete and thorough. Please use additional pages as necessary.

A. Please state 1) what District rule, regulation or order you either are or will be in violation of, and 2) the date said violation will or did occur. Include as appropriate the applicable permit conditions for which variance relief is being sought.

The facility will be in violation of APCD Permit 5651 conditions related to Rules 206, and 328. See the attached table for a detailed description of the District rules and associated permit conditions that the facility cannot or are impractical to meet during the facility shut down.

B. Please describe how compliance with the District rule, regulation or order listed in Section A above is beyond your reasonable control. In addition to any other relevant factors, please include in your discussion 1) what actions you have taken to comply or seek a variance, which were timely and reasonable under the circumstances.

As a result of the failure of the Plains All American Pipeline's Line 901 on May 19, 2015 ExxonMobil experienced facility impacts. Due to these impacts, SYU onshore and offshore facilities are temporarily ceasing operations. On June 16, 2015 incoming platform gas terminated. Preservation plans for the facility are still in progress. Line 901 remains shut down, and Plains continues to work with local and federal government agencies to understand the nature of the failure and repair options. At this time it is unclear when restart of the facility may occur.

ExxonMobil is requesting a variance to allow the suspension of certain permit requirements specified in the attached table until the facility returns to normal operations. Within 180 days of platform gas processing, all conditions suspended under the terms of the variance will resume as described in the current Part 70/PTO 5651.

- C. Please describe how you would be impacted if you were required to immediately comply with the District rule, regulation or order the subject of this variance request. In addition to any other relevant factors, please discuss why such impacts would result in 1) an arbitrary or unreasonable taking of property, or 2) the practical closing and elimination of a lawful business.

ExxonMobil has no means of immediately complying with certain rules and permit conditions cited in the attached table. The attached table provides further information of these conditions. This unanticipated shut down of the facility was not within our control.

- D. If you were required to immediately comply with the District rule, regulation or order the subject of this variance request, please describe what impact, if any that would have on air contaminants.

ExxonMobil has no means of immediately complying with certain rules and permit conditions cited in the attached table. The attached table provides further information of these conditions. This unanticipated shut down of the facility was not within our control.

- E. Please describe what consideration you have given to curtailing of operations in lieu of obtaining a variance.

Curtailing operations would not result in compliance and would not remove the need for a variance.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

There will be no excess emissions associated with this variance.

- G. If requested to do so by the District, please describe how you will monitor or otherwise quantify and report to the District any pollutant emissions associated with the granting of your variance.

There will be no excess emissions associated with this variance.

6. **SUPPLEMENTAL FINDINGS IF APPLYING FOR AN EMERGENCY VARIANCE PURSUANT TO RULE 506 (EMERGENCY VARIANCE FOR BREAKDOWNS)**

- A. Please provide the date and time the breakdown was reported to the District

Date: _____ Time: _____

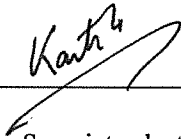
- B. Breakdown number (as provided by the District):
 - C. Please provide a description of the “breakdown condition”, including equipment involved and the cause to the extent it is known.
 - D. Please describe why the continued operation of your facility in a “breakdown condition” is not likely to cause an immediate threat or hazard to public health or safety and will not interfere with the attainment or maintenance of any primary national ambient air quality standard.
7. Will the operation of the equipment subject to this variance result in violation of District Rule 303, Nuisance?

The granting of this variance will not result in injury, detriment, nuisance, or annoyance to the public, and will not endanger the health or safety of the public or cause injury or damage to business or property.

- 8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court.

No case involving the equipment subject to this variance is pending in any court, civil or criminal, for which ExxonMobil is aware.

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury under the laws of the State of California, that the above Petition, including any attachments and the items therein set forth, are true and correct.

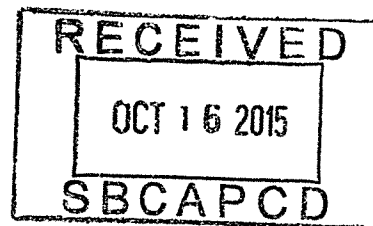
DATE: 9/28/15 SIGNATURE: 
 TITLE: Operations Superintendent
 PRINT NAME: Kartik Garg

Variance Filing Fees: All variance Petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company’s reimbursable account. You may also pay your filing fees by credit card using the attached form. Current variance filing fees may be found under Rule 210, schedule F, Sections 12a and 12b at <http://www.sbcapcd.org/fees.htm>.

LFC Permit (5651) Variance Petition 2

Area	Condition	Condition Language	Other information
CEMS	9.C.15	ExxonMobil shall implement a CEM program for emissions and process parameters as specified in Section 4.12 and Attachment 10.1 of this permit. ExxonMobil shall implement the District-approved CEM Plan. The CEM monitors shall be in place and functional for the life of the project.	Petitioner requests relief from all CEMs plan RATA and RAA requirements for all equipment that is temporarily out of service.
CEMS	CEMS plan	8.4 Annual Relative Accuracy Test Audit (RATA) of CPP &WGI	CPP due Dec/Jan, WGI due March/April. CPP may be periodically operated although timing is unknown and it would not be at normal operating rates so RATA is not feasible. WGI RATA can not be done until receiving platform gas. Petitioner requests relief from all RATA requirements of until 6 months after resumption of platform gas processing.
CEMS	CEMS plan	8-11 Relative Accuracy Audit (RAA) of WGI stack every quarter	Petitioner requests relief from all RAA requirements until 6 months after resumption of platform gas processing.

ExxonMobil Production Company
U.S. Production - Santa Ynez Unit
P.O. Box 1207
Goleta, California 93116-1207



ExxonMobil
Production

September 28, 2015

Petition for Interim and Normal Variances
SYU Las Flores Canyon and POPCO

Ms. Sara Hunt
Santa Barbara County
Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, California 93110-1315

Dear Ms. Hunt:

Attached please find petitions for Interim and Normal Variances for the POPCO and LFC facilities. These petitions are related to permit conditions which are not feasible to meet due to the current status of the facilities. We understand that the variances, if granted, will provide protection from enforcement of violations of these conditions.

SBCAPCD has ExxonMobil's authorization to charge the applicable filing fee to our reimbursable account with the District.

If you have any questions or need further information, please contact Patrice Surmeier at (805) 961-4297 or Sandra Combe at (805) 271-2633.

Sincerely,

A handwritten signature in black ink, appearing to read "Kartik", with a long, sweeping underline that extends to the right.

Kartik Garg
Operations Superintendent

Santa Ynez Unit Project
ExxonMobil Production Company
(a division of Exxon Mobil Corporation)

Attachment

cc: Michael McKay SBCAPCD