



January 17, 2017

Petition for Regular Variance Modification
Permit 9100

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 the referenced Modified Regular Variance Petition for ExxonMobil's Platform Hondo facility. This petition is related to permit conditions which cannot be met during the preservation period. We understand that the variances, if granted, will provide protection from violations of these conditions.

Please find below a description of the modifications made:

Original	Modification	Reason
9.C.2.c.1.iii	9.C.2.c.iii	Original condition reference number was incorrect
9.C.9 (b)	9.C.9 (b)(i,iii,iv,v,vi, vii)	Original condition reference number was incorrect.
9.C.9 (f)	9.C.9 (e)	Original condition reference number was incorrect.
9.C.9 (g)	9.C.9 (f)(i)	Original condition reference number was incorrect.
9.C.9 (h)(x)	delete	Original condition reference number was incorrect.
Language related to 9.C.9 (h) (iv)	See deleted language	Small correction to permit language which does not impact petition.

Apologies for any confusion this may have caused. If you have any questions or need further information, please contact Erin Grubbs at (832) 624-2069 or at erin.n.grubbs@exxonmobil.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J.S. Patten" with a stylized flourish at the end.

Jack Jones
Operations Superintendent

Attachment

PTO 9100 - Hondo Variance Petition

Area	Condition	Condition Language	Other Information
Flare	9.C.2.c.i	Flare Volumes -Unplanned flaring shall be monitored on an aggregate basis and shall be the difference between the total flare volume and the volume of gas flared during planned flaring events. The meters shall be calibrated and operated consistent with ExxonMobil' s District approved Process Monitor Calibration and Maintenance Plan.	The Hondo flare is preserved and petitioner requests relief from monitoring preserved flow lines. However, as described in the Petition Section B.5 the flare is periodically needed to combust gases accumulated from well casing pressure build up. The petitioner requests that calibration and maintenance for the flare meters FE-1110-2 (Low Volume Flare Flow), FE-1110-2 (High Volume Flare Flow), FE-1110-3 (Compressor Seal Vent Flow) & FE-1141 (Low Pressure Vent Scrubber) be suspended during the preservation period. The Low Volume Flare Flow meter (FE-1110-2) does not read low enough to measure the flow from these events and is not providing useful information. For this reason, EM is proposing to calculate flow from any flare event using standard engineering calculations instead of maintaining the flare flow meters.
Flare	9.C.2.c.ii	Purge/Pilot Gas - ExxonMobil shall continuously monitor the purge/pilot fuel gas using gas detector tubes (or District-approved equivalent). ExxonMobil shall record in a log the results of each gas detector tube reading. ExxonMobil shall also perform annual total sulfur content and HHV measurements of the fuel gas.	This condition is related to the measurement of flare pilot and purge fuel gas (not propane). During preservation only propane will be used for any necessary flare pilots and any purge is now nitrogen. Petitioner requests relief from specific monitoring and measurements for purge/pilot fuel gas which is not being used.
Flare	9.C.2.c.3.iii	Flaring Sulfur Content - On an annual basis, ExxonMobil shall also measure the non-hydrogen sulfide reduced sulfur compounds.	Petitioner requests relief from specific monitoring and measurements when the equipment is temporarily not in service. The sampling is performed on the discharge line from the SUI compressors, which normally operates at 1000 psi, but currently is not in service and the line is nitrogen purged.
Flare	9.C.2.c.iv	ExxonMobil shall continuously monitor each pilot to ensure that a flame is present at each pilot at all times.	The flare pilots will be preserved except if needed to flare gases accumulated from well casing pressure build up. Petitioner requests relief from specific monitoring for the flare while temporarily preserved. When the pilots are lit, this condition will be met.
Flare	9.C.2.d.i - 9.C.2.d.v	Recordkeeping: (i) Flare Event Logs - The volumes of gas combusted and resulting mass emissions of all criteria pollutants for each type of event shall also be summarized for a cumulative summary for each day, quarter and year. (iii) Pilot/Purge Gas Volume - The volume of pilot/purge fuel gas combusted in the flare shall be recorded on a weekly, quarterly and annual basis.	Petitioner requests relief from specific recordkeeping for equipment temporarily preserved. Recordkeeping conditions will be met when pilots are lit.
Fugitive Hydrocarbon Emission Components	9.C.3.b.i	VRS Use - The vapor recovery and gas collection (VR & GC) systems at Platform Hondo shall be in operation when equipment connected to these systems are in use. These systems include piping, valves, and flanges associated with the VR & GC systems.	Petitioner requests relief from this condition because equipment connected to these systems will not meet Rule 331 applicability thresholds during the preservation period.

Tanks/Sumps/Separators.	9.C.6.b.i	The vapor recovery systems shall be in operation when the equipment connected to the VRS systems at the facility are in use. The VRS system includes piping, valves, and flanges associated with each VRS system.	Petitioner requests relief from this condition because equipment connected to these systems will not be in use during the preservation period.
Tanks/Sumps/Separators.	9.C.6.c.i	Analyze the process streams listed the Process Stream Sampling and Analysis permit condition below.	Petitioner requests relief from sampling during the preservation period of process streams that are not being produced.
Tanks/Sumps/Separators.	9.C.6.d, 9.C.6.d(i) 9.C.6.d(ii)	The equipment listed in this section is subject to all the recordkeeping requirements listed in District Rule 325.F. In addition, ExxonMobil shall maintain logs for the information listed below. (i) On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production. (ii) Process stream analyses data as required from the Process Stream Sampling and Analysis permit condition.	Petitioner requests relief from recordkeeping requirements on equipment that is temporarily not in service.
CVR	9.C.9 (b), (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), (n), (o), (p), (q), (r), (s), (t), (u), (v), (w), (x), (y), (z), (aa), (ab), (ac), (ad), (ae), (af), (ag), (ah), (ai), (aj), (ak), (al), (am), (an), (ao), (ap), (aq), (ar), (as), (at), (au), (av), (aw), (ax), (ay), (az), (ba), (bb), (bc), (bd), (be), (bf), (bg), (bh), (bi), (bj), (bk), (bl), (bm), (bn), (bo), (bp), (bq), (br), (bs), (bt), (bu), (bv), (bw), (bx), (by), (bz), (ca), (cb), (cc), (cd), (ce), (cf), (cg), (ch), (ci), (cj), (ck), (cl), (cm), (cn), (co), (cp), (cq), (cr), (cs), (ct), (cu), (cv), (cw), (cx), (cy), (cz), (da), (db), (dc), (dd), (de), (df), (dg), (dh), (di), (dj), (dk), (dl), (dm), (dn), (do), (dp), (dq), (dr), (ds), (dt), (du), (dv), (dw), (dx), (dy), (dz), (ea), (eb), (ec), (ed), (ee), (ef), (eg), (eh), (ei), (ej), (ek), (el), (em), (en), (eo), (ep), (eq), (er), (es), (et), (eu), (ev), (ew), (ex), (ey), (ez), (fa), (fb), (fc), (fd), (fe), (ff), (fg), (fh), (fi), (fj), (fk), (fl), (fm), (fn), (fo), (fp), (fq), (fr), (fs), (ft), (fu), (fv), (fw), (fx), (fy), (fz), (ga), (gb), (gc), (gd), (ge), (gf), (gg), (gh), (gi), (gj), (gk), (gl), (gm), (gn), (go), (gp), (gq), (gr), (gs), (gt), (gu), (gv), (gw), (gx), (gy), (gz), (ha), (hb), (hc), (hd), (he), (hf), (hg), (hh), (hi), (hj), (hk), (hl), (hm), (hn), (ho), (hp), (hq), (hr), (hs), (ht), (hu), (hv), (hw), (hx), (hy), (hz), (ia), (ib), (ic), (id), (ie), (if), (ig), (ih), (ii), (ij), (ik), (il), (im), (in), (io), (ip), (iq), (ir), (is), (it), (iu), (iv), (iw), (ix), (iy), (iz), (ja), (jb), (jc), (jd), (je), (jf), (jg), (jh), (ji), (jj), (jk), (jl), (jm), (jn), (jo), (jp), (jq), (jr), (js), (jt), (ju), (jv), (jw), (jx), (jy), (jz), (ka), (kb), (kc), (kd), (ke), (kf), (kg), (kh), (ki), (kj), (kk), (kl), (km), (kn), (ko), (kp), (kq), (kr), (ks), (kt), (ku), (kv), (kw), (kx), (ky), (kz), (la), (lb), (lc), (ld), (le), (lf), (lg), (lh), (li), (lj), (lk), (ll), (lm), (ln), (lo), (lp), (lq), (lr), (ls), (lt), (lu), (lv), (lw), (lx), (ly), (lz), (ma), (mb), (mc), (md), (me), (mf), (mg), (mh), (mi), (mj), (mk), (ml), (mm), (mn), (mo), (mp), (mq), (mr), (ms), (mt), (mu), (mv), (mw), (mx), (my), (mz), (na), (nb), (nc), (nd), (ne), (nf), (ng), (nh), (ni), (nj), (nk), (nl), (nm), (nn), (no), (np), (nq), (nr), (ns), (nt), (nu), (nv), (nw), (nx), (ny), (nz), (oa), (ob), (oc), (od), (oe), (of), (og), (oh), (oi), (oj), (ok), (ol), (om), (on), (oo), (op), (oq), (or), (os), (ot), (ou), (ov), (ow), (ox), (oy), (oz), (pa), (pb), (pc), (pd), (pe), (pf), (pg), (ph), (pi), (pj), (pk), (pl), (pm), (pn), (po), (pp), (pq), (pr), (ps), (pt), (pu), (pv), (pw), (px), (py), (pz), (qa), (qb), (qc), (qd), (qe), (qf), (qg), (qh), (qi), (qj), (qk), (ql), (qm), (qn), (qo), (qp), (qq), (qr), (qs), (qt), (qu), (qv), (qw), (qx), (qy), (qz), (ra), (rb), (rc), (rd), (re), (rf), (rg), (rh), (ri), (rj), (rk), (rl), (rm), (rn), (ro), (rp), (rq), (rr), (rs), (rt), (ru), (rv), (rw), (rx), (ry), (rz), (sa), (sb), (sc), (sd), (se), (sf), (sg), (sh), (si), (sj), (sk), (sl), (sm), (sn), (so), (sp), (sq), (sr), (ss), (st), (su), (sv), (sw), (sx), (sy), (sz), (ta), (tb), (tc), (td), (te), (tf), (tg), (th), (ti), (tj), (tk), (tl), (tm), (tn), (to), (tp), (tq), (tr), (ts), (tt), (tu), (tv), (tw), (tx), (ty), (tz), (ua), (ub), (uc), (ud), (ue), (uf), (ug), (uh), (ui), (uj), (uk), (ul), (um), (un), (uo), (up), (uq), (ur), (us), (ut), (uu), (uv), (uw), (ux), (uy), (uz), (va), (vb), (vc), (vd), (ve), (vf), (vg), (vh), (vi), (vj), (vk), (vl), (vm), (vn), (vo), (vp), (vq), (vr), (vs), (vt), (vu), (vv), (vw), (vx), (vy), (vz), (wa), (wb), (wc), (wd), (we), (wf), (wg), (wh), (wi), (wj), (wk), (wl), (wm), (wn), (wo), (wp), (wq), (wr), (ws), (wt), (wu), (wv), (ww), (wx), (wy), (wz), (xa), (xb), (xc), (xd), (xe), (xf), (xg), (xh), (xi), (xj), (xk), (xl), (xm), (xn), (xo), (xp), (xq), (xr), (xs), (xt), (xu), (xv), (xw), (xx), (xy), (xz), (ya), (yb), (yc), (yd), (ye), (yf), (yg), (yh), (yi), (yj), (yk), (yl), (ym), (yn), (yo), (yp), (yq), (yr), (ys), (yt), (yu), (yv), (yw), (yx), (yz), (za), (zb), (zc), (zd), (ze), (zf), (zg), (zh), (zi), (zj), (zk), (zl), (zm), (zn), (zo), (zp), (zq), (zr), (zs), (zt), (zu), (zv), (zw), (zx), (zy), (zz), (A), (B), (C), (D), (E), (F), (G), (H), (I), (J), (K), (L), (M), (N), (O), (P), (Q), (R), (S), (T), (U), (V), (W), (X), (Y), (Z), (AA), (AB), (AC), (AD), (AE), (AF), (AG), (AH), (AI), (AJ), (AK), (AL), (AM), (AN), (AO), (AP), (AQ), (AR), (AS), (AT), (AU), (AV), (AW), (AX), (AY), (AZ), (BA), (BB), (BC), (BD), (BE), (BF), (BG), (BH), (BI), (BJ), (BK), (BL), (BM), (BN), (BO), (BP), (BQ), (BR), (BS), (BT), (BU), (BV), (BW), (BX), (BY), (BZ), (CA), (CB), (CC), (CD), (CE), (CF), (CG), (CH), (CI), (CJ), (CK), (CL), (CM), (CN), (CO), (CP), (CQ), (CR), (CS), (CT), (CU), (CV), (CW), (CX), (CY), (CZ), (DA), (DB), (DC), (DD), (DE), (DF), (DG), (DH), (DI), (DJ), (DK), (DL), (DM), (DN), (DO), (DP), (DQ), (DR), (DS), (DT), (DU), (DV), (DW), (DX), (DY), (DZ), (EA), (EB), (EC), (ED), (EE), (EF), (EG), (EH), 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Facility Throughput	9.C.18	ExxonMobil shall record in a log the volumes of oil emulsion and gas produced and the actual number of days in production per month.	Petitioner requests relief from recordkeeping related to temporarily preserved equipment
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