

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



January 17, 2017

Petition for Regular Variance Modification
Permit 9102

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 Las Flores Canyon, Platform Heritage 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(i) & (i)(1)	9.C.2.c (i)	PTO 9102 does not have a condition 9.C.2.c(i)(1)
9.C.2.c(i)(2)	Strikethrough and delete	PTO 9102 does not have a condition 9.C.2.c(i)(2)
9.C.2.c(ii)	Strikethrough and delete	Condition 9.C.2.c(ii) was incorrectly requested in the original petition.
9.C.2.c(v)	9.C.2.c(iv)	Condition was incorrectly labeled in original petition.
9.C.2.c(vii)	9.C.2.c(v)	Condition was incorrectly labeled in original petition.
9.C.2.d(i, ii, iv, v)	9.C.2.d(i, ii, iv)	PTO 9102 does not have a condition 9.C.2.d(v)
9.C.3.d.v	9.C.3.d.iv	Condition was incorrectly labeled in original 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 blue ink that reads "Ben Wood".

Ben Wood
SYU SSH&E Supervisor
U.S. Production

Attachment

PTO 9102 - Heritage Variance Petition

Facility	Condition	Condition Language	Other Information
Crane Engines	9.C.1.(a)(i)	Prime Engines - Compliance shall be based on quarterly or more frequent portable analyzer inspections in accordance with Rule 333.F and source testing as applicable per Rule 333.I.8	During the preservation period the crane is being used approximately 15% of the time compared to how often it is used in a normal operating year. Petitioner requests quarterly portable analyzer inspections be reduced to annual inspections.
Central Process Heater	9.C.2.c (i) & (i)(1)	The hourly fuel rate (scfh) of the fuel combusted by the CPH shall be measured by a District-approved fuel metering system.	Petitioner requests relief from monitoring process streams that are temporarily preserved.
Central Process Heater	9.C.2.c (i)(2)	On a quarterly basis, a produced gas sample shall be obtained and analyzed for high heating value (Btu/scfh).	The process heater is preserved. Produced gas for fuel is not being generated. Petitioner requests relief from sampling until produced fuel gas is being generated.
Central Process Heater	9.C.2.e (ii)	ExxonMobil shall collect and analyze a produced gas sample for HHV according to the District-approved Central Process Heater Monitoring Plan.	The process heater is preserved. Produced gas for fuel is not being generated. Petitioner requests relief from sampling until produced fuel gas is being generated.
Central Process Heater	9.C.2.c (iv)	ExxonMobil shall monitor the sulfur content of the natural gas fuel using an in-line continuous hydrogen sulfide analyzer. ExxonMobil shall implement the District-approved Fuel Gas Sulfur Reporting Plan for the life of the project.	Petitioner requests relief from monitoring process streams that are temporarily preserved. Petitioner requests relief from annual sampling, recordkeeping and reporting in this plan as it relates to preserved equipment.
Central Process Heater	9.C.2.c (v)	ExxonMobil shall monitor all the parameters required by the Platform Harmony Heritage Central Heater Monitoring Plan .	Petitioner requests relief from monitoring process streams that are temporarily preserved.
		Recordkeeping: (i) Natural Gas Fuel Use - Daily, quarterly and annual fuel (ii) Sulfur Content-A monthly log of the total sulfur content of fuel.	
Central Process Heater	9.C.2.d. (i,ii,iv,v)	(iv) Hourly Heat Input- Record in a log or electronic file the calculated heat input (MMBtu/hr.) for each hour of operation. (v) ExxonMobil shall maintain records as required by the Platform Harmony Heritage Central Heater Monitoring Plan.	Petitioner requests relief from recordkeeping for equipment temporarily preserved.
Flare	9.C.3.d.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 flare for Harmony Heritage is currently preserved and petitioner requests relief from monitoring preserved flow lines. The petitioner requests that calibration and maintenance for FE-134-1 (24" orifice meter for high volume flow on outlet of flare scrubber), FE-134-2 (FCI probe meter for low volume flow on inlet of flare scrubber), FE-134-3 (FCI probe meter low volume flow from vent recovery compressor suction scrubber), FE-134-4 (FCI probe meter for low volume flow from vent recovery compressor suction scrubber or auxiliary distance pieces) be suspended during the preservation period.
			Although this has not occurred and it is not anticipated to occur, if the flare is needed to combust gases accumulated from well casing pressure build up, the petitioner requests to calculate the volume flared from engineering estimates. The Low Volume Flare Flow meter does not read low enough to measure the flow from these events and would not provide useful information.
Flare	9.C.3.d.ii	ExxonMobil shall continuously monitor the purge/pilot fuel gas using an H2S analyzer. 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. 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.3.d.iii	Flaring Sulfur Content - On an annual basis, ExxonMobil shall also measure the nonhydrogen sulfide reduced sulfur compounds and these values shall be added to the hydrogen sulfide measurements to obtain the total sulfur content.	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 SLI compressors, which normally operates at 1000 psi, but currently is not in service and the line is nitrogen purged.

Flare	9.C.3.d. iv	ExxonMobil shall continuously monitor each pilot to ensure that a flame is present at each pilot at all times.	Petitioner requests relief from specific monitoring for the flare while temporarily preserved.
Flare	9.C.3.e (ii,iii)	Recordkeeping: (ii) The total volume of gas combusted and resulting in mass emissions of all criteria pollutants from unplanned flaring events shall be summarized for each 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.
Fugitive Hydrocarbon Emissions Components	9.C.4.b(i)	(i) VRS Use - The vapor recovery and gas collection (VR & GC) systems at Platform Harmony Heritage 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/Separator s.	9.C.7 (b)(i)	VRS Use - The vapor recovery systems shall be in operation when the equipment connected to the VRS system 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 is preserved.
Tanks/Sumps/Separator s.	9.C.7(d)	Recordkeeping: On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production	Petitioner requests relief from recordkeeping for equipment temporarily preserved.
Compliance Verification Reports	9.C.10 (b)(i,ii,iii), (c)(i,ii,iii,iv,v,vi), (f), (g)(i), (i)(iv)	The report shall include the following information: (b) Central Process Heater (i) The daily, quarterly and annual fuel use (ii) The monthly total sulfur content of the natural gas and propane combusted as fuel gas. (iii) All data required to be reported by the Platform Harmony Heritage Central Heater Monitoring Plan. (c) Flare (i) The volumes of gas combusted and resultant mass emissions for each flare category presented as a cumulative summary for each day, quarter and year. (ii) The highest total sulfur content and hydrogen sulfide content observed each week in the flare header. (iii) The monthly total sulfur content of flare purge and pilot fuel gas. (iv) A copy of the Flare Event Log (v) Flare Gas Sulfur Content Logs(vi) Rule 359.H Annual report for each platform per the District approved Flare Gas Plan (f) Pigging. For each pig receiver and launcher, the number of pigging events per day, quarter and year. (g) Tanks/Sumps/Separators (i) On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production. (i) General reporting requirements (iv) The produced gas, produced oil, fuel gas, and produced wastewater process stream analyses as required by condition 9.C.13 of this permit. Process stream analyses per Section 4.12.	The petitioner requests that semiannual reporting for preserved equipment be limited to a declaration of current state (i.e., preserved)
Compliance Verification Reports	9.C.10 (i)(iv)	(i) General reporting requirements (iv) The produced gas, produced oil, fuel gas, and produced wastewater process stream analyses as required by condition 9.C.13 of this permit. Process stream analyses per Section 4.12.	Petitioner requests relief from sampling and recordkeeping during the preservation period of process streams that are not being produced.
Process Stream Sampling and Analysis	9.C.13 (a) & (b)	ExxonMobil shall sample and analyze the process streams listed in Section 4.12 of this permit according to the methods and frequency detailed in that Section.	Petitioner requests relief from sampling and recordkeeping during the preservation period of process streams that are not being produced.
Process Monitoring Systems - Operation and Maintenance.	9.C.16	All platform process monitoring devices listed in Section 4.11.2 of this permit shall be properly operated and maintained according to manufacturer recommended specifications. ExxonMobil shall implement the District approved Process Monitor Calibration and Maintenance Plan for the life of the project.	The plan already allows preservation of devices that monitor preserved equipment. The petitioner requests relief from the Plan for the calibration of the flare meters (i.e., FE-134-1, FE-134-2, FE-134-3, FE-134-4).
Facility Throughput Limits	9.C.19	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 for equipment temporarily preserved.
Documents Incorporated by Reference	9.C.24	The documents listed below, including any District approved updates thereof, are incorporated herein and shall have the full force and effect of a permit condition for this operating permit.	The petitioner is requesting relief from elements of the Flare Gas Sulfur Reporting Plan, Process Monitor Calibration and Maintenance Plan, Fuel Gas Sulfur Reporting Plan, Platform Harmony Heritage Central Process Heater Monitoring Plan as identified in other sections of this petition.