



air pollution control district
SANTA BARBARA COUNTY

Case No / Date	2020-07-E	03/12/2020
Petitioner	ExxonMobil Oil & Gas Company	
Permit #	9102-R6	
Date Rec'd	03/09/2020	
Time Rec'd	1353 hours	
FOR OFFICIAL USE ONLY		

**BEFORE THE HEARING BOARD
OF THE SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT**

in the Matter of the Application of)
ExxonMobil Oil & Gas Company for an)
Emergency Variance from District)
Rules 331.E.1.c, 206, and Part)
70/Permit to Operate 9102-R6)
Conditions 9.C.4.b and 9.C.24.a.)

H.B. Case No. 2020-07-E

VARIANCE FINDINGS

AND ORDER

ExxonMobil Oil and Gas Company, a Division of Exxon Mobil Corporation, filed a Petition for an Emergency Variance on March 9, 2020. A hearing of the above-entitled matter was held on March 12, 2020. Jun Kim, represented the Petitioner, Aimee Long represented the Santa Barbara County Air Pollution Control District, and Terence Dressler represented the Hearing Board for this Emergency Hearing.

This matter having been fully presented and duly considered, the Hearing Board makes the following findings and gives the following reasons for its decision.

1. Notice of the Hearing was duly given in the manner and for the time required by law.
2. Sworn testimony and argument on behalf of the Petitioner and the Air Pollution Control Officer were made, received and considered.
3. The Petitioner operates the equipment described in the Petition at Platform Heritage which is located in the Santa Ynez Unit on the OCS lease tract P-0182 approximately 25 miles west of the City of Santa Barbara, California.
4. On March 2, 2020, the Petitioner discovered a fugitive Reactive Organic Compound (ROC) leak (in excess of 10,000 ppm) on a grease injection port thread on wellhead HE-25 on Platform Heritage. The Petitioner immediately tightened the leaking port but was not successful at repairing the leak. This type of leak requires a five-day repair time. On March 9, 2020, the Petitioner requested breakdown coverage (Breakdown Report 11728)

extending coverage for an additional 24 hours. To make the repairs, the wellhead must be depressurized for safety concerns. However, the repairs cannot be conducted during the requested coverage. As a result, additional relief was sought.

5. Without Variance coverage, the Petitioner will be in violation of District Rules 331.E.1.c, 206, and Part 70/Permit to Operate 9102-R6, Conditions 9.C.4.b and 9.C.24.a.
6. If, due to reasons beyond the control of the Petitioner, successful repairs are not completed during this Variance period, additional relief will be sought.
7. The Petitioner will monitor and record on a daily basis, all emissions related to the granting of this Variance. At the time of the Variance submittal request, the total ROC emissions were 0.94 pounds of ROCs.
8. A nuisance as defined in District Rule 303 is not expected to occur as a result of this variance and continued operation is not likely to create an immediate threat or hazard to public health or safety.
9. The District staff supports the Petition as conditioned below.
10. Pursuant to Health and Safety Code section 42359.5, I find that "good cause" exists for the granting of Petitioner's request for an Emergency Variance.

THEREFORE, THE HEARING BOARD ORDERS, as follows:

That an Emergency Variance be granted for the continued operation of the Petitioner's facility in violation of District Rules 331.E.1.c, 206, and Part 70/Permit to Operate 9102-R6, Conditions 9.C.4.b and 9.C.24.a. from March 9, 2020 through March 23, 2020, or the date compliance is achieved, whichever occurs first, with the following conditions:

1. Petitioner shall submit a written report to the Hearing Board and District by March 30, 2020. The report shall include the date compliance was achieved together with the cause of the malfunction, description of the corrective action taken, the dates, times, and actual emissions that occurred during the variance period.
2. Petitioner shall retain the obligation to comply with all other local, state and federal regulations not specifically referenced in the Order.
3. Failure to abide by all conditions of this Order shall subject the Petitioner receiving the variance to penalties set forth in Health and Safety Code section 42402.
4. In accordance with District Fees Rule 210, Schedule F.12.e, the Petitioner shall pay excess emission fees for each additional ton of pollutant emissions or portion thereof allowed as the result of the issuance of this Variance.
5. Each day during any portion of which a violation occurs is a separate offense.
6. The Environmental Protection Agency does not recognize California's Variance Program, therefore, this Variance does not protect the Petitioner from Federal Enforcement actions.

DATED: 3/12/2020



Terence Dressler, Chair
Santa Barbara County Air Pollution Control District
Hearing Board