



air pollution control district
SANTA BARBARA COUNTY

HEARING BOARD STAFF REPORT

TYPE: REGULAR VARIANCE

CASE NO: 2020-09-R

DATE: June 3, 2020

1.0 GENERAL INFORMATION:

- 1.1 **PETITIONER COMPANY NAME:** DCOR, LLC
- 1.2 **EQUIPMENT LOCATION:** Platform A in the Dos Cuadras Field located on offshore lease tract OCS-P-0241, approximately 6 miles south-southeast from the City of Santa Barbara, California
- 1.3 **PERMIT NUMBER(S):** Part 70 Permit to Operate 9110-R5
- 1.4 **FACILITY NAME/ID:** Platform A/FID 8003
- 1.5 **FACILITY DESCRIPTION:** Platform A is a twelve leg, fifty-seven well slot platform. The Petitioner utilizes sub-sea pipelines to transport crude oil and produced gas to an onshore facility for further processing.

2.0 REASON FOR THE VARIANCE REQUEST: Southern California Gas Company will conduct planned maintenance on their Main Gas Transmission Pipeline L-1004, which will prohibit the Petitioner from using it. Without use of the pipeline the Petitioner is requesting to flare produced gas. Due to the duration of the maintenance activities, the Petitioner expects to exceed the permitted annual planned flaring limit. As a result, the Petitioner will be in violation of District Rule 206, and Part 70 Permit to Operate 9110-R5 Conditions 9.C.2.a and 9.C.2.b(i), for the remainder of the year.

3.0 BACKGROUND: The Petitioner utilizes sub-sea pipelines to transport crude oil and produced gas to an onshore facility for processing. After processing, natural gas is transported via Southern California Gas Company, Main Gas Transmission Pipeline L-1004. The Petitioner was informed Pipeline L-1004 will be shut down for pipeline integrity hydrotesting starting May 20, 2020, for approximately 30 days. Since the Petitioner is not able to send the gas to the pipeline, they are requesting to flare the produced gas until maintenance activities are completed.

4.0 PERMITTING HISTORY: Part 70 Permit to Operate 9110-R5 was issued on June 14, 2018 and is due for reevaluation December 2020.

5.0 COMPLIANCE HISTORY: There are no enforcement actions regarding planned flaring from the Platform during the past three (3) years.

6.0 REGULATORY ANALYSIS: The following permit conditions and rule requirements are applicable to the variance request:

- **Part 70 Permit to Operate 9110-R5, Conditions 9.C.2.a (Emission Limits)**
 - *Mass emissions from the flare relief system listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.*

- **Part 70 Permit to Operate 9110-R5, Condition 9.C.2.b(i) (Flaring Volumes):** *Flaring volumes from the purge and pilot, planned continuous, planned intermittent (other) and unplanned events shall not exceed the volumes in Table 5.1-1.*

7.0 **EMISSIONS ANALYSIS:** The excess emissions associated with the granting of the Petitioner's request are not yet known. Because flaring is lost revenue, the Petitioner will limit flaring events to the maximum extent feasible, for the remainder of the year.

8.0 ***RESERVED***

9.0 **OTHER FACTORS:** None

10.0 **DISTRICT RECOMMENDATION:** The District supports the Petitioner's variance request.

11.0 **ATTACHMENTS:**

- Attachment 1 – Draft Regular Variance Order 2020-09-R



Aimee Long, Air Quality Specialist
Compliance Division

May 19, 2020
Date