



1600 Norris Road • Bakersfield, CA 93308

April 8, 2020

Engineering Division
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

**Subject: South Cuyama Stationary Source Title V Renewal
E&B Natural Resources Management Corporation
South Cuyama Unit, SSID 01073**

To Whom It May Concern:

Please find enclosed an application for permit renewal of the following Title V Permits for E&B Natural Resources Management Corporation (E&B), South Cuyama Stationary Source (SSID 01073):

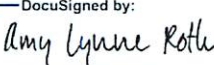
Permit to Operate (PTO) 7250 R10 (FID 01074), South Cuyama Unit;
PTO 9136 R8 (FID 03202), Gas Plant 10; and
PTO 8010 R9 (FID 08916), Internal Combustion Engines.

E&B has prepared a table of equipment that should be de-permitted and the associated emissions, E&B also requests to include any new equipment that was installed at the South Cuyama Stationary Source since the previous permit renewal in this Title V permit renewal. In addition to equipment changes in the field, E&B is requesting that all waste water tanks are now referred to as produced water tanks, please make this change throughout all the permits.

An application filing fee of One Thousand Two Hundred and Sixty dollars (\$1,260.00) has been included with this application.

Please contact me with any comments or questions at (562) 548-6815.

Sincerely,

DocuSigned by:

6595F3A28BA540A...

Amy Roth
V.P. Regulatory Affairs
E&B Natural Resources Management Corporation

C: W. Goller, E&B Natural Resources Management Corporation
M. Strange, M. F. Strange & Associates, Inc.

California • Kansas • Louisiana • Wyoming

(661) 679-1700 • www.ebresources.com



air pollution control district
SANTA BARBARA COUNTY

General Permit Application Form -01

Santa Barbara County Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

1. APPLICATION TYPE (check all that apply):

- ☐ Authority to Construct (ATC) ☐ Transfer of Owner/Operator (use Form -01T)
☐ Permit to Operate (PTO) ☐ Emission Reduction Credits
☐ ATC Modification ☐ Increase in Production Rate or Throughput
☐ PTO Modification ☐ Decrease in Production Rate or Throughput
☒ Other (Specify)

Previous ATC/PTO Number (if known)

☒ Yes ☐ No

Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. <http://www.ourair.org/wp-content/uploads/t5-forms.pdf>

Mail the completed application to the APCD's Engineering Division at the address listed above.

2. FILING FEE:

A \$420 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.ourair.org/district-fees>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (School Summary Form) <http://www.ourair.org/wp-content/uploads/apcd-03.pdf> ☐ Yes ☒ No

If yes, provide the name of school(s)

Address of school(s)

City

Zip Code

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? ☐ Yes ☒ No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): <http://www.ourair.org/wp-content/uploads/6100-020.pdf>, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY			DATE STAMP
FID		Permit No.	
Project Name			
Filing Fee	202.E? YES / NO		

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	E&B Natural Resources Management Corporation		
Doing Business As			
Contact Name	Amy Roth	Position/Title	VP Regulatory Affairs
Mailing Address	249 East Ocean Blvd., Suite 900		
City	Long Beach	State	CA Zip Code 90802
Telephone	(562) 548-6815	Cell	Email aroth@ebresources.com

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	E&B Natural Resources Management Corporation		
Doing Business As			
Contact Name	Whitney Goller	Position/Title	Environmental/Regulatory Tech
Mailing Address	P.O. Box 179		
City	New Cuyama	State	CA Zip Code 93254
Telephone	(661) 766-2501	Cell	(661) 369-0155 Email wgoller@ebresources.com

Authorized Agent Info*		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	M. F. Strange & Associates, Inc.		
Doing Business As			
Contact Name	Marianne Strange	Position/Title	President
Mailing Address	P.O. Box 1484		
City	Santa Barbara	State	CA Zip Code 93102
Telephone	(805) 564-6590	Cell	(805) 570-9740 Email mstrange@mfsair.com

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (<http://www.ourair.org/wp-content/uploads/apcd-01a.pdf>). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO (check all that apply):	
<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
<input checked="" type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

Oil and Gas

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	South Cuyama Unit, SSID: 01073		
City	New Cuyama	State	CA Zip Code 93254
Work Site Phone	+1 (661) 766-2501		

☐ Incorporated (within city limits) ☒ Unincorporated (outside city limits) ☐ Used at Various Locations

Assessors Parcel No(s): 147-150-010

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

E&B Natural Resources Management Corporation (E&B) is applying for the permit re-evaluation for the South Cuyama Unit. All TV re-eval Forms have been included. At this time E&B has prepared Table 1 that details equipment that should be de-permitted during this re-eval and Table 2 that details the potential emission reductions associated with the equipment that is being de-permitted. The potential emission reductions are detailed in APCD Form 1302 – B. E&B is also requesting that all references to "Wastewater" be replaced with "Produced Water", this include all tanks, pits and permit language. +

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: ☐ Yes ☒ No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

☐ Yes ☒ No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

10. PROJECT STATUS:

A. Date of Equipment Installation

B. Have you been issued a Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)?
If yes, the application filing is double per Rule 210.

☐ Yes ☒ No

C. Is this application being submitted due to the loss of a Rule 202 exemption?

☐ Yes ☒ No

D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions.

☐ Yes ☒ No

E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T.

☐ Yes ☒ No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.


Signature of application preparer

Apr 3, 2020

Date

Whitney Goller

Print name of application preparer

E&B Natural Resources Management

Employer name

12. APPLICATION CHECKLIST (check all that apply)

- ☒ Application Filing Fee (Fee = \$420. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- ☐ Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
- ☐ Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.ourair.org/wp-content/uploads/apcd-01t.pdf>
- ☐ Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.ourair.org/wp-content/uploads/apcd-03.pdf>
- ☒ Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.ourair.org/permit-applications>) that apply to the project.
- ☐ Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.ourair.org/wp-content/uploads/apcd-01a.pdf>
- ☐ Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, Amy Roth, am employed by or represent
Type or Print Name of Authorized Company Representative

E&B Natural Resources Management Corporation
Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By: Frank Ronkese

Title: Chief Financial Officer

Date: Apr 3, 2020

Phone: (661) 679-1700

Signature of Authorized Company Representative



**PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL
RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.**



air pollution control district
SANTA BARBARA COUNTY

**Credit Card
Authorization Form -01C**

Santa Barbara County Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

You must complete this authorization form to pay your invoice with your Credit Card. For your convenience you may bring this form to our office or you may mail it to the address listed on your invoice.

Contact your credit card company for your account status, billing problems, or declined authorization
These issues can not be resolved by the APCD

Type of Credit Card

☐ Visa

☒ MasterCard



Card Number

5563 6500 0073 9581

Expiration Date

11/20

Security Code

568

Cardholder Name	Edward Fetterman
Billing Address	11000 Norris Road
City	Bakersfield
State, Zip Code	CA, 93308
Daytime Phone Number	(661) 679-1700
Authorized Signature	
Fax Number or email if receipt required	wgolter@ebresources.com

	Invoice # / Description	Amount
1	SCU Re-eval \$420*3	1,260
2		
3		
	Total Payment	\$1,260.00

Table 1. Equipment List to De-Permit**South Cuyama Unit (SCU) Stationary Source****FID: 01074, SSID: 01073****PTO No. 07250-R10 PT-70/Reeval**

Location	Device No.	Device Name
Tank Farm #2	101001	Vapor Recovery System
	000742	Pit (81 sq. ft)
	101003	Pit Pump
	101002	LACT Unit
Tank Farm #6	000598	Test Tank
Tank Farm #17	000611	Test Tank - 200 bbl
	000755	Wastewater Pit (108 sq. ft)
	101034	Transfer Pump
Machader PW Tank Farm	000620	Oil Recovery Tank - 100 bbl
Perkins PW Tank Farm	000631	Tank Heater
	008303	Hot Water Tank - 500 bbl

South Cuyama Unit (SCU) IC Engines**FID: 08916, SSID: 01073****PTO No. 0810-R9 PT-70/Reeval**

Location	Device No.	Device Name
SCU IC Engines	006388	IC Engine: W-2
	006389	IC Engine: W-3
	006391	IC Engine: W-4
	006351	IC Engine: MM-5
	006361	IC Engine: MM-11
	006379	IC Engine: W-24
	006381	IC Engine: W-36
	006347	IC Engine: W-38
	006387	IC Engine: W-51

TABLE 2: South Cuyama Stationary Source Change in Permitted Potential to Emit
Current Permitted PTE

Limited PTE		TPY											MTY
		NOx	ROC	CO	SOX	PM	PM10	PM 2.5	Benzene	Hexane	Toluene	Formaldehyde	GHG
SCU	7250-R10	0.43	101.07	0.36	0.6	0.3	0.3	0.3	1.99	10.18	1.22	0.00	512.9
SCU ICE's	8010-R9	45.94	28.89	345.37	7.34	0.86	0.86	0.86	0.08	0.00	0.03	1.06	9234.54
GP 10	9136-R8	3.09	29.00	13.84	5.01	0.78	0.78	0.78	0.08	3.68	0.00	0.04	5065.09
SCU SS	Total	49.46	158.96	359.57	12.95	1.94	1.94	1.94	2.15	13.86	1.25	1.1	14812.53

Equipment to be de-permitted

PTO 7250	Device #	NOx	ROC	CO	SOX	PM	PM10	PM 2.5	Benzene	Hexane	Toluene	Formaldehyde	GHG
	000631	0.43	0.02	0.36	0.6	0.3	0.3	0.3	1.99	10.18	1.22	0.00	512.90
	008303	-	0.04	-	-	-	-	-	0	0	0	0	-
	000598	-	0.08	-	-	-	-	-	0	0	0	0	-
	000611	-	0.53	-	-	-	-	-	0	0	0	0	-
	000755	-	0.17	-	-	-	-	-	0	0	0	0	-
	000620	-	0.03	-	-	-	-	-	0	0	0	0	-
	Sum	0.43	0.87	0.36	0.6	0.3	0.3	0.3	1.99	10.18	1.22	0	

Equipment to be de-permitted

PTO 8010	Device #	NOx	ROC	CO	SOX	PM	PM10	PM 2.5	Benzene	Hexane	Toluene	Formaldehyde	GHG
	006388	1.48	6.45	78.5	1.06	0.08	0.08	0.08	0.01	0.00	0.00	0.16	910.14
	006389	1.48	6.45	78.5	1.06	0.08	0.08	0.08	0.01	0.00	0.00	0.16	910.14
	006391	1.48	6.45	78.5	1.06	0.08	0.08	0.08	0.01	0.00	0.00	0.16	910.14
	006351	3.79	0.2	3.18	0.27	0.02	0.02	0.02	0.00	0.00	0.00	0.00	232.72
	006361	3.79	0.2	3.18	0.27	0.02	0.02	0.02	0.00	0.00	0.00	0.00	232.72
	006379	3.76	0.2	3.16	0.27	0.02	0.02	0.02	0.00	0.00	0.00	0.00	231.03
	006381	3.76	0.2	3.16	0.27	0.02	0.02	0.02	0.00	0.00	0.00	0.00	231.03
	006347	3.17	0.17	2.67	0.23	0.02	0.02	0.02	0.00	0.00	0.00	0.00	195.1
	006387	3.76	0.2	3.16	0.27	0.02	0.02	0.02	0.00	0.00	0.00	0.00	231.03
	Sum	26.47	20.52	254.01	4.76	0.36	0.36	0.36	0.03	0.00	0.00	0.48	4084.05

New Equipment PTE
For PTO 7250 R11

		TPY										MTY	
		NOx	ROC	CO	SOX	PM	PM10	PM 2.5	Benzene	Hexane	Toluene	Formaldehyde	GHG
	14751	0.00	0.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
	15098	0.00	0.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
	15271	0.00	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
	15370	0.00	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
	Sum	0.00	1.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

New PTE **7250 R11**

TPY											MTY
NOx	ROC	CO	SOX	PM	PM10	PM 2.5	Benzene	Hexane	Toluene	Formaldehyde	GHG
0.00	101.42	0	0	0	0	0	0	0	0	0	0.00

New PTE **8010 R10**

	19.47	8.37	91.36	2.58	0.5	0.5	0.5	0.05	0	0.03	0.58		5150.49
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New PTE **9136 R9**

	3.09	29.00	13.84	5.01	0.78	0.78	0.78	0.08	3.68	0.00	0.04		5065.09
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Stationary Source PTE

	22.56	138.79	105.2	7.59	1.28	1.28	1.28	0.13	3.68	0.03	0.62		10215.58
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Reduction in SS PTE	26.9	20.17	254.37	5.36	0.66	0.66	0.66	2.02	10.18	1.22	0.48		4596.95
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Authorized Agent Form - 01A

AUTHORIZED AGENT FORM

I hereby designate Marianne Strange
(agent's name - print)

of M. F. Strange & Associates, Inc.
(agent's business name - print)

to serve as the Authorized Agent for my company: _____

E&B Natural Resources
(applicant or permitted company's name - print)

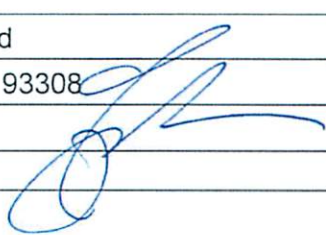
at South Cuyama Unit: SSID 01073
(facility name(s) - print)

in dealing with the Santa Barbara County Air Pollution Control District (APCD) in
matters regarding (check as appropriate):

- | | |
|---|--|
| <input checked="" type="checkbox"/> Permitting | <input type="checkbox"/> Billing |
| <input type="checkbox"/> Air Toxics/HRA | <input checked="" type="checkbox"/> Source Testing |
| <input checked="" type="checkbox"/> Inspections and permit compliance | <input type="checkbox"/> All of the above |
| <input type="checkbox"/> Other (state purpose): _____ | |

This Designation includes written correspondence, telephone discussions and meetings
and shall remain in effect until it is suspended in writing by my company or the following
date: Indefinitely whichever is earlier.

As a designated Responsible Official, I hereby authorize the above mentioned agent to
represent my company in the matters identified above:

Name (print)	Frank Ronkese
Title	Chief Financial Officer
Phone	(661) 679-1700
Address	1600 Norris Road
City, State, ZIP	Bakersfield, CA 93308
Signature	

APCD-01A (9/2011)

Louis D. Van Mullem, Jr. • Air Pollution Control Officer

260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • www.sbcapcd.org • 805.961.8800 • 805.961.8801 (fax)

STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: E&B Natural Resources Management Corporation

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: South Cuyama Stationary Source
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): E&B Natural Resources Management Corporation
4. Mailing Address of Responsible Official: 1600 Norris Road, Bakersfield, CA 93308
5. Street Address of Source Location (include Zip Code): 1848 Perkins Road, New Cuyama, CA 93254
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line ☐ Yes ☒ No
50 miles of a Native American Nation ☐ Yes ☒ No ☐ Not Applicable
8. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government
☐ Partnership ☐ Utility Company
9. Legal Owner's Name: E & B Natural Resources Management Corporation
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Frank Ronkese Title: Chief Financial Officer Telephone #: (661) 679-1700
12. Plant Site Manager/Contact: Edward Fetterman Title: Production Superintendent Telephone #: (661) 766-2501
13. Type of facility: Oil and gas production
14. General description of processes/products:
Oil and gas are produced from wells at the South Cuyama Unit and processed at various tank batteries on the lease.
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? ☐ Yes ☒ No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? ☐ Not Applicable ☐ Yes ☒ No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

STATIONARY SOURCE SUMMARY (Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS Processing ID:
COMPANY NAME: E&B Natural Resources Management Corporation	SOURCE NAME: South Cuyama Stationary Source

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
Initial SBCAPCD's Regulation XIII Application		
✓ Permit Renewal	PTO 7250, PTO 9136, PTO 8010	June 16, 2020
Significant Permit Revision*		
Minor Permit Revision*		
Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve: a: ☐ Portable Source ☐ Voluntary Emissions Caps
☐ Acid Rain Source ☐ Alternative Operating Scenarios
☐ Source Subject to MACT Requirements [Section 112]

b: ☒ None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule? ☐ Yes ☒ No

- 3. For permit modifications, provide a general description of the proposed permit modification:**

E&B Natural Resources Management Corporation (E&B) is submitting this application for the Title V re-evaluation for the South Cuyama Stationary Source.

***Requires APCD-approved NSR permit prior to a permit revision submittal**

TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS Processing ID:
COMPANY NAME: E&B Natural Resources Management Corporation	SOURCE NAME: South Cuyama Stationary Source

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario:

Oil and gas are produced from wells at the South Cuyama Unit and processed at various tank batteries on the lease. Emissions are based on the South Cuyama Stationary Source current total source emissions. Emissions from equipment that is permitted under Authority to Construct (ATC) permits are not included in the total stationary source emissions.

POLLUTANT * (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	22.56	49.46	26.9
ROC	131.82	157.46	27.14
CO	105.2	359.57	254.37
SOx	7.59	12.95	5.36
PM	1.28	1.94	0.66
PM10	1.28	1.94	0.66
Benzene	0.13	2.15	2.02
Formaldehyde	0.62	1.1	0.62
Hexane	3.68	13.86	10.18
Toluene	0.03	1.25	1.22
Xylene	< 1	< 1	<1

* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

EXEMPT EMISSIONS UNITS (Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: E&B Natural Resources Management Corporation	SOURCE NAME: South Cuyama Stationary Source

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES ☒ NO ☐

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
Abrasive Blasting	Facility/Equipment Maintenance	0.05 TPY PM & PM10 (Per PTO 7250)
Lubricating oil Storage (drums)	Equipment Maintenance	< 0.01 TPY ROC
Various Oils Storage (IBP>300F)	Facility/Equipment Maintenance	< 0.01 TPY ROC
Solvents & Coatings	Facility/Equipment Maintenance	1.02 TPY ROC (Per PTO 7250)
195 hp E/S Generator (W-17)	Gas Plant 10 E/S Power (PTO 8010)	0.34 TPY NOx; 0.02 TPY ROC; 0.28 TPY CO;
195 hp E/S Generator (W-17)	Gas Plant 10 E/S Power (PTO 8010)	0.02 TPY SOx; & < 0.01 TPY PM & PM10

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

Abrasive Blasting, Lubricating Oil Storage in Drums, and Various oils with IBP > 300 F storage - Reference PTO's 7250 & 9136, Sections 5.6 and PTO 7250 Table 5.5.

Solvents and Coatings - Reference PTO 7250 Section 5.6 and Table 5.3

195 hp Waukesha W-17 E/S Generator - Reference PTO 8010 Section 5.6 and Table 5.4

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: E&B Natural Resources Management Corporation	SOURCE NAME: South Cuyama Stationary Source

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Regulatory Reference ²	Applicable Federal Requirement ¹		In compliance? (yes/no/exempt ³)	Effective Date ⁴
	Regulation Title ²	Affected Emission Unit		
APCD Rule 301	Circumvention	Entire Source	Yes	June 2020
APCD Rule 302	Visible Emissions	Entire Source	Yes	June 2020
APCD Rule 303	Nuisance	Entire Source	Yes	June 2020
APCD Rule 304	Particulate Matter – Northern Zone	Each PM Source	Yes	June 2020
APCD Rule 309	Specific Contaminants	Combustion Units	Yes	June 2020
APCD Rule 310	Odorous Organic Sulfides	Combustion Units	Yes	June 2020
APCD Rule 311	Sulfur Content of Fuel	Combustion Units	Yes	June 2020
APCD Rule 316	Storage and Transfer of Gasoline	Gas Station	Yes	June 2020
APCD Rule 317	Organic Solvents	Maintenance/Wipe Cleaning	Yes	June 2020
APCD Rule 321	Solvent Cleaning Operations	Maintenance Operations	Yes	June 2020
ADCD Rule 322	Metal Surface Coating Thinner and Reducer	Maintenance Operations	Yes	June 2020
APCD Rule 323	Architectural Coatings - Standards	Maintenance Operations	Yes	June 2020
APCD Rule 324	Disposal and Evaporation of Solvents	Maintenance/Wipe Cleaning	Yes	June 2020
APCD Rule 325	Crude Oil Production and Separation	Wash Tank, crude storage tanks, produced water tanks	Yes	June 2020
APCD Rule 331	Fugitive Emissions Inspection & Maintenance	All components (valves, flanges, seals, compressors and pumps) used to handle oil and gas	Yes	June 2020

Applicable Federal Requirement¹		Affected Emission Unit	In compliance? (yes/no/exempt³)	Effective Date⁴
Regulatory Reference²	Regulation Title²			
APCD Rule 333	Control of Emissions from Reciprocating IC Engines	Controlled Natural Gas (NG) fired rich burn ICEs, Clark #11 compressor (subject to Section H and I only), standby engine (subject to Section B.2 only),	Yes	June 2020
APCD Rule 343	Petroleum Storage Tank Degassing	Wash Tank, crude storage tanks, produced water tanks	Yes	June 2020
APCD Rule 344	Petroleum Wells, Sumps and Cellars	Well cellars, sump, produced water pits	Yes	June 2020
APCD Rule 353	Adhesives and Sealants	Maintenance Operations	Yes	June 2020
APCD Rule 359	Flares and Thermal Oxidizers	Flare	Yes	June 2020
APCD Rule 360	Emissions of Oxides of Nitrogen From Large Water Heaters and Small Boilers	Water heaters, boilers, steam generators or process heaters with a rated heat input capacity greater than or equal to 75,000 Btu/hour up to and including 2,000,000 Btu/hr	Yes	June 2020
APCD Rule 505.A,B1,D	Breakdown Conditions	All Emission Units	Yes	June 2020
APCD Rule 603	Emergency Episode Plans	Entire Source	Yes	June 2020
APCD Regulation VIII	New Source Review	Entire Source	Yes	June 2020
APCD Regulation XIII	Part 70 Operating Permits	Entire Source	Yes	June 2020
40 CFR Parts 51/52	New Source Review (Nonattainment Area Review and Prevention of Significant Deterioration)	Entire Source	Yes	June 2020
40 CFR Part 60	New Source Performance Standards	Entire Source	Yes	June 2020
40 CFR Part 61	National Emission Standards for Hazardous Air Pollutants	All stationary reciprocating internal combustion engines	Yes	June 2020
40 CFR Part 63	Maximum Achievable Control Technology	None	Exempt per §63.760(e)(1) based on 'black oil' production	June 2020
Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	All stationary reciprocating internal combustion engines	Yes	June 2020

Applicable Federal Requirement ¹		Affected Emission Unit	In compliance? (yes/no/exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²			
40 CFR Part 64	Compliance Assurance Monitoring	Emission units with a control device used to comply with an emission standard	Exempt – no control devices used to comply with an emission standard	June 2020
40 CFR Part 70	Operating Permits	Entire Source	Yes	June 2020
¹ Review APCD SIP Rules, NSPS, NESHAPS, and MACTs. ² Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection) ³ If exempt from applicable federal requirement, include explanation for exemption. ⁴ Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.				

Other Applicable Federal Requirements ⁵ <i>NOTE: PC # varies in each PTO</i>	Affected Emission Unit	In compliance?	Effective Date
PTO 7250 Condition C.2 PTO 9136 Condition C.2 Fugitive Hydrocarbon Emissions Components	Valves and Fittings (Dev. No. 101050)	Yes	June 2020
	Pumps, Compressors and Wellheads (Dev. No. 000738)	Yes	June 2020
	Components at Gas Plant (Dev. Nos. 008323, 008325, 008327, 008327, 008328, 008329, 008330, 008331, 008332, 105000, 105001)	Yes	
PTO 7250 Condition C.3 Petroleum Storage and Processing Tanks	TF #6 Test Tank (Dev. No. 000594)	Yes	June 2020
	TF #6 Wash Tank (Dev. No. 105087)	Yes	June 2020
	TF #6 Wash Tank (Dev. No. 105964)	Yes	June 2020
	TF #6 Wash Tank (Dev. No. 109943)	Yes	June 2020
	TF #6 LACT Tank (Dev. No. 000763)	Yes	June 2020
	TF #6 LACT Tank (Dev. No. 000596)	Yes	June 2020
	Hibbard #7 Wash Tank (Dev. No. 000616)	Yes	June 2020
	Hibbard #7 Stock Tank (Dev. No. 000617)	Yes	June 2020
	Hibbard #7 Test Tank (Dev. No. 000618)	Yes	June 2020
	Hibbard #7 Stock Tank (Dev. No. 000766)	Yes	June 2020
	TF#10 Crude Oil Slop tank (Dev. No. 0083202)	Yes	June 2020
	TF #18 Wash Tank (Dev. No. 113667)	Yes	June 2020
	TF #18 Crude Oil Tank (Dev. No. 112293)	Yes	June 2020
	TF #18 Test Tank (Dev. No. 000612)	Yes	June 2020

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
PTO 7250 Condition C.4 Wastewater Tanks, Pits and Well Cellars	TF #6 Produced Water Pit (Dev. No. 000745)	Yes	June 2020
	TF #6 Produced Water Pit (Dev. No. 000860)	Yes	June 2020
	TF #7 Hibberd Pits (Dev. No. 000861)	Yes	June 2020
	TF #7 Hibberd Pit (Dev. No. 000746)	Yes	June 2020
	TF #10 Pit (Dev. No. 000748)	Yes	June 2020
	TF #10 Produced Water Pit (Dev. No. 000863)	Yes	June 2020
	TF #17 Pit (Dev. No. 000755)	Yes	June 2020
	TF #18 Produced Water Pit (Dev. No. 000872)	Yes	June 2020
	TF #18 Pit (Dev. No. 000756)	Yes	June 2020
	Machader PWTP Pit (Dev. No. 000878)	Yes	June 2020
	Machader PWTP Pit (Dev. No. 00879)	Yes	June 2020
	Perkins PWTP Pit (Dev. No. 000762)	Yes	June 2020
	Perkins PWTP Pit (Dev. No. 000877)	Yes	June 2020
	Perkins PWTP Pit (Dev. No. 000880)	Yes	June 2020
	Perkins PWTP Pit (Dev. No. 000881)	Yes	June 2020
	Perkins Produced Water Pit (Dev. No. 000882)	Yes	June 2020
	Perkins WWTP Produced Water Pit (Dev. No. 000883)	Yes	June 2020
	Well Cellars (Dev. No. 000740)	Yes	June 2020
	Perkins Produced Water Tank East (Dev. No. 113736)	Yes	June 2020
	Perkins Produced Water Tank West (Dev. No. 000760)	Yes	June 2020
	Machader Produced Water Tank (Dev. No. 000875)	Yes	June 2020
	Machader Produced Water Tank (Dev. No. 386662)	Yes	June 2020
	Machader Produced Water Tank (Dev. No. 393131)	Yes	June 2020
PTO 7250 Condition C.5 Gas Station	Aboveground Storage Tank (Dev. No. 112769)	Yes	June 2020
PTO 7250 Condition C.6 Solvent Usage	Photochemically Reactive Solvents; Non-photochemically Reactive Solvents	Yes	June 2020
PTO 7250 Condition C.7 Requirements For Produced Gas	All Devices	Yes	June 2020
PTO 7250 Condition C.8 PTO 8010 Condition C.13 PTO 9136 Condition C.4 Semi-Annual Compliance Verification Reports	All Devices	Yes	June 2020
PTO 7250 Condition C.9 PTO 8010 Condition C.18 PTO 9136 Condition C.6 Documents Incorporated by Reference	All Devices	Yes	June 2020
PTO 8010 Condition 9.C.1 Derated Internal Combustion Engines	Derated gas-fired, rich burn, ICEs less than 50 hp limits (Dev. Nos. 006347, 006348, 006350, 006351, 006361, 006363, 006379, 006381, 006384, 006387)	Yes	June 2020
PTO 8010 Condition 9.C.2 Controlled Rich Burn Internal Combustion Engines	Controlled gas-fired ICEs rated greater than 50 hp (Dev. Nos. 006388, 006389, 006391, 006395, 006396, 006397)	Yes	June 2020
PTO 8010 Condition 9.C.3 Limited Use Internal Combustion Engines	Clark #11 Compressor (Dev. No. 006402)	Yes	June 2020

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
PTO 8010 Condition 9.C.4 Microturbine	Microturbine (Dev. No. 114976)	Yes	June 2020
PTO 8010 Condition 9.C.5 Engine Identification	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.6 Maintenance	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.7 Fuel Use Monitoring	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.8 Fuel Type	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.9 Gaseous Fuel Sulfur Limit	All Gaseous fueled engines	Yes	June 2020
PTO 8010 Condition 9.C.10 Liquid Fuel Sulfur Limit	All Diesel fueled engines	Yes	June 2020
PTO 8010 Condition 9.C.11 Fuel Sulfur/BTU Monitoring	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.12 Recordkeeping	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.14 Source testing	Controlled Natural Gas-Fired, Rich Burn, Noncyclic ICE's (Dev. No.'s 006388, 006389, 006391, 006397)	Yes	June 2020
PTO 8010 Condition 9.C.15 Visible Emissions – Diesel Fueled IC Engines	All ICEs identified in Table 5.1-1	Yes	June 2020
PTO 8010 Condition 9.C.16 DOI #0033	Entire Stationary Source	Yes	June 2020
PTO 8010 Condition 9.C.17 DOI #0061-02	Entire Stationary Source	Yes	June 2020
PTO 9136 Condition 9.C.1 External Combustion Equipment	Glycol reboiler (Dev. No. 008333) Glycol reboiler (Dev. No. 008334) Amine reboiler (Dev. No. 105021)	Yes	June 2020
PTO 9136 Condition 9.C.3 Flare Emissions	Flare (Dev. No. 101060)	Yes	June 2020
PTO 9136 Condition 9.C.5 Amine System Operational Restrictions	Amine reboiler (Dev. No. 105021)	Yes	June 2020
⁵ All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.			

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-11" appear on each page. ***

COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY <
COMPANY NAME: E&B Natural Resources Management Corporation	APCD IDS Processing ID: SOURCE NAME: South Cuyama Stationary Source

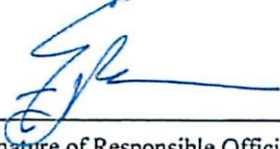
III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;

Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;

Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²



Signature of Responsible Official
Frank Ronkese

4/10/2020

Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: E&B Natural Resources Management Corporation	SOURCE NAME: South Cuyama Stationary Source

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

- ☒ Stationary Source Summary Form
- ☒ Total Stationary Source Emission Form
- ☒ Compliance Plan Form
- ☒ Compliance Plan Certification Form
- ☒ Exempt Equipment Form
- ☒ Certification Statement Form

List other forms or attachments

check here if additional forms
listed on back

Attachments included with application

- ☐ Description of Operating Scenarios
- ☐ Sample emission calculations
- ☐ Fugitive emission estimates
- ☐ List of Applicable requirements
- ☐ Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
- ☐ Facility schematic showing emission points
- ☐ NSR Permit
- ☐ PSD Permit
- ☐ Compliance Assurance monitoring protocols
- ☐ Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official

Date

Print Name of Responsible Official: Frank Ronkese

Title of Responsible Official and Company Name: Chief Financial Officer
E&B Natural Resources Management Corporation