



Cat Canyon Resources, LLC  
E : info@catcanyonresources.com

www.catcanyonresources.com  
6085 Cat Canyon Road  
Santa Maria, CA 93454



October 7, 2024

Santa Barbara County  
Air Pollution Control District  
301 Cook ST, Suite L  
Santa Maria, California 93454

RE: Cat Canyon Resources, LLC – Petition for Variance Filing Fees

To Whom It May Concern:

Cat Canyon Resources, LLC submitted a Petition for Variance via email on Monday September 30, 2024. Enclosed is a Money Order for the amount of \$2191.00 covering the cost of Variance filing fees using the current pay schedule. Thank you very much for your time.

Regards,

A handwritten signature in blue ink, appearing to be "JD", with a long horizontal flourish extending to the right.

Jason Downing



air pollution control district  
SANTA BARBARA COUNTY

H.B. Case No.:	<u>2024-10-R</u>
Petitioner:	<u>Cat Canyon Resources, LLC</u>
Permit No.:	<u>PTO 07149-R11</u>
Date Rec'd:	<u>09/30/2024</u>
Time Rec'd:	<u>0814 hours</u>
Filing Fee Paid:	<u>\$1,850.00</u>

## PETITION FOR VARIANCE

<b>Type of Variance Requested:</b>			
Emergency	<input type="checkbox"/>	Interim <sup>1</sup>	<input type="checkbox"/>
		90-Day	<input type="checkbox"/>
			Regular <input checked="" type="checkbox"/>
Length of Variance Requested:	Start Date	<u>10/01/2024</u>	
	End Date	<u>9/29/2025</u>	
<sup>1</sup> A 90-Day or Regular Variance must be filed concurrently with an Interim Variance			

### 1. PETITIONER INFORMATION

A. Please provide the name, address and phone number of the Petitioner.

Name: Cat Canyon Resources  
 Address: 6085 Cat Canyon Road Santa Maria, CA 93454  
 Phone Number: (805) 250-5774

B. Please provide the name, address and phone number of the person authorized to receive correspondence regarding this Petition if different from response in 1.A.

Name: Jason Downing  
 Address: 6085 Cat Canyon Road Santa Maria, CA 93454  
 Phone Number: (805) 868-8743

C. The Petitioner is (please check one):

- 1) An Individual ( )
- 2) Partnership ( )
- 3) Corporation (X)
- 4) Public Agency ( )
- 5) Other Entity (please describe)

2. Location of equipment for which the variance is requested if different from response in 1.A.

Tognazzini Lease, Cat Canyon Oilfield  
SSID 11136; FID 03200

3. List any District permits that are applicable to the equipment subject to this variance request.

PTO 07149-R11

4. Briefly describe the equipment that is the subject of this Petition.

Tank Heater (Boiler), APCD Device ID 391794 used to provide heat to the crude oil storage tanks to facilitate the separation and loading oil.

**5. FINDINGS REQUIRED FOR THE GRANTING OF A VARIANCE**

In order for the Hearing Board to grant a variance to a Petitioner authorizing the operation of a source in violation of any rule, regulation or order of the District, the Hearing Board is required to make "findings" in accordance with the requirements specified in California Health and Safety Code §42352, et. seq. and District rules and regulations. The Hearing Board's variance decision will take into consideration information you provide in this Petition. Please ensure your responses are complete and thorough. Please use additional pages as necessary.

A. Please state 1) what District rule, regulation or order you either are or will be in violation of, and 2) the date said violation will or did occur. Include as appropriate the applicable permit conditions for which variance relief is being sought.

1) Violation of District Rules 342.G.1 and 206, Conditions 3.c and 6.a of PTO 7149-R11

2) The violation will occur October 1<sup>st</sup>, 2024 at 12:00 am (an extension was provided by the District to complete the annual source test by 9/30/2024)

- B. Please describe how compliance with the District rule, regulation or order listed in Section A above is beyond your reasonable control. In addition to any other relevant factors, please include in your discussion 1) what actions you have taken to comply or seek a variance, which were timely and reasonable under the circumstances.

The entirety of Cat Canyon Resources operations ceased production in June of 2024. CCR is unable to comply with the source testing requirements at this time due to the fact that the field is not in operation at this time. As a result, the boiler is unable to operate. Once the field is operational, with fluid in the tanks and the gas supply to fire the boiler has been re-established (fired on treated field gas), a source test will be scheduled with all of the proper notifications. It is CCR's estimation that once the field returns to service, a source test will be conducted within forty-five (45) days. This accounts for time needed for the third-party source testing contractor (*Alliance Source Testing*) to schedule the source test (currently about 30 days out) and update the Source Test Protocol and submit to the District for approval

- C. Please describe how you would be impacted if you were required to immediately comply with the District rule, regulation or order the subject of this variance request. In addition to any other relevant factors, please discuss why such impacts would result in 1) an arbitrary or unreasonable taking of property, or 2) the practical closing and elimination of a lawful business.

Immediate compliance with District Rules is not possible at this time. There is no fuel source available to conduct source testing until the field comes back online.

- D. If you were required to immediately comply with the District rule, regulation or order the subject of this variance request, please describe what impact, if any, that would have on air contaminants.

Immediate compliance with District Rules is not possible at this time. There is no fuel source available to conduct source testing until the field comes back online.

- E. Please describe what consideration you have given to curtailing operations in lieu of obtaining a variance.

Operations have been curtailed since June 2024.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

There will be no excess pollutants. There is no fuel source for this piece of equipment to operate until the field operations have been restored.

- G. If requested to do so by the District, please describe how you will monitor or otherwise quantify and report to the District any pollutant emissions associated with the granting of your variance.

*N/A (There will be no excess pollutants. There is no fuel source for this piece of equipment to operate until the field operations have been restored.)*

6. SUPPLEMENTAL FINDINGS IF APPLYING FOR AN EMERGENCY VARIANCE  
PURSUANT TO RULE 506 (EMERGENCY VARIANCE FOR BREAKDOWNS)

A. Please provide the date and time the breakdown was reported to the District

Date: N/A Time: N/A

B. Breakdown number (as provided by the District):

Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known.

C. Please describe why the continued operation of your facility in a "breakdown condition" is not likely to cause an immediate threat or hazard to public health or safety and will not interfere with the attainment or maintenance of any primary national ambient air quality standard.

7. Will the operation of the equipment subject to this variance result in violation of District Rule 303, Nuisance?


No, this equipment is not operational at this time due to lack of fuel source.

8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court.

To the best of my knowledge, there is no civil or criminal case involving the equipment subject to this variance pending in any court

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury that the above Petition, including any attachments and the items therein set forth, are true and correct.

DATE: 09.30.2024

SIGNATURE: -   
TITLE: - EHS. KC MANAGER  
PRINT NAME: - JASON DOWNING

**Variance Filing Fees:** All variance Petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company's reimbursable account. You may also pay your filing fees by credit card using the attached form. Current variance filing fees may be found under Rule 210, schedule F, Sections 12a and 12b at <http://www.sbcapcd.org/fees.htm>

**Credit Card Payment:** The Variance Filing Fee may be paid with a credit card. Please use APCD Form -01C to pay via credit card. The form may be downloaded at: <http://www.sbcapcd.org/eng/dl/dl01.htm>