

Keith Wenal
Beacon West Energy Group
1145 Eugenia Place, Suite 101
Carpinteria, CA 93013

FID: 03105
Permit: PM 08234 09
SSID: 01063

Re: Permit to Operate Application 08234 09

Dear Keith Wenal:

On October 8, 2024, the Santa Barbara County Air Pollution Control District (District) determined that your application for Permit to Operate (PTO Mod) No. 08234-09 to remove permit conditions in PTO 8234-R12 related to flaring and the Data Acquisition System was complete. The District will make a decision to either issue or deny a permit for the application within 180 days from the completeness date.

Please be advised that operations not authorized by the Authority to Construct Source Compliance Demonstration Period permit condition violate District Rule 201 and may result in penalties.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8312.

Sincerely,



William Sarraf, Division Supervisor
Engineering Division

cc: Platform Holly 03105 Project File
Engr Chron File

\\sbcpd.org\shares\Groups\ENGR\WP\Oil&Gas\Major Sources\SSID 01063 Venoco - Ellwood\03105 Platform Holly\PTOs\PTO Mod 8234-09\PTO Mod 8234 09 - PTO Completeness - 9-11-2024



September 10, 2024

Santa Barbara County APCD
260 N. San Antonio Rd. Suite A
Santa Barbara, CA 93110

Attn: William Sarraf

Subject: Incomplete Permit to Operate Application 08234 09
FID: 03105
SSID: 01063

Dear Mr. Sarraf,

This correspondence serves as a response to the Incompleteness letter for the application for Permit to Operate (PTO Mod) No. 08234 09 received by the District on October 18, 2023. The PTO Mod was submitted to remove: 1) the High-Pressure Flare (Device ID #7982) and associated permit condition 9.C.3, and 2) the DAS parameters associated with Platform Holly in Table 9.C.14-1 of the PTO.

In response to the District Incompleteness letter we are providing the following information to demonstrate no potential to emit:

- Platform Holly well remediation work has been completed and all wells have been permanently plugged and abandoned with well conductor removal completed on September 4, 2024. Therefore, there are no well production sources of hydrocarbon or H₂S emissions from Platform Holly.
- All platform production related equipment has been isolated, depressured, drained and flushed, air-gapped and/or opened to atmosphere.
- The High-Pressure Flare and Low-Pressure flares have been removed from service. Propane pilot fuel removed from the platform.
- There is no remaining equipment or activities on Platform Holly which require vapor recovery.
- All equipment and activities associated with Platform Holly DAS parameters listed in Table 9.C.14-1 of PTO 8234-RII have been permanently removed from service and are terminated.

Beacon West provided edits/comments to remove the equipment and associated conditions discussed above from the Draft Pt-70 Renewal/PTO 08234-R12 on August 21, 2024.

I can be contacted at (805) 395-9656 or keith.wenal@beacon-west.com if you have any questions or need more information.

Sincerely,

Keith Wenal
Chief Compliance Officer
Beacon West Energy Group, LLC

CC: Joe Fabel - CSLC
Peter Regan - CSLC

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

**CALIFORNIA STATE LANDS
COMMISSION**

301 E. Ocean Blvd., Suite 550
Long Beach, CA 90802-8833



Established in 1938

JENNIFER LUCCHESI, Executive Officer

916.574.1800

TTY CA Relay Service: **711** or Phone
800.735.2922

from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 562.590.5201

Contact Fax: 562.432.6035

September 16, 2024

Sent Electronically Only: harrisd@sbcapcd.org

File Ref.: Leases 3120.1, 3242.1

Davi Harris, Division Manager
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite A
Santa Barbara, CA 93110

**Subject: Completion of Permanent Plug and Abandonment of Wells, Leases
3120.1, 3242.1, Platform Holly Offshore Goleta, Santa Barbara County**

Dear David Harris,

This letter is to attest and certify that on September 3, 2024, the California State Lands Commission, as operator of Platform Holly offshore Goleta, Santa Barbara County, has completed the permanent plug and abandonment of all 30 well located on the platform, including the cutting and removal of each conductor casing previously linking the platform to the former oil and gas wells.

As of September 3, 2024, Platform Holly has no potential to produce oil or gas, including hydrogen sulfide gases which were the concern and risk identified within Permits to Operate and the 1999 abatement order by the District. We formally request that the District please consider this information in light of the Commission's applications before the District. Please do not hesitate to contact me if you have any questions.

Sincerely,

DocuSigned by:
Peter Regan
AEC65FD2888147B...

Peter Regan
Assistant Division Chief
Mineral Resources Management Division

Cc: keith.wenal@beacon-west.com, sarrafw@sbcapcd.org
tricia.winterbauer@beacon-west.com

October 18, 2023

Certified Mail
Read Receipt Requested 9171 9690 0935 0315 1516 23

John Garnett
Beacon West Energy Group
1145 Eugenia Place, Suite 101
Carpinteria, CA 93013

FID: 03105
Permit: PM 08234 09
SSID: 01063

Re: Incomplete Permit to Operate Application 08234 09

Dear John Garnett:

On September 22, 2023, the Santa Barbara County Air Pollution Control District (District) received your application for Permit to Operate (PTO Mod) No. 08234 09 for the removal of the high pressure flare and DAS conditions. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8317. Thank you for your cooperation.

Sincerely,



Agnieszka Letts, Air Quality Engineer II
Engineering Division

Attachment: Incompleteness Items

cc: Platform Holly 03105 Project File
Engr Chron File
Agnieszka Letts

\\sbcped.org\shares\Groups\ENGR\WP\Oil&Gas\Major Sources\SSID 01063 Venoco - Ellwood\03105 Platform Holly\PTOs\PTO Mod 8234-09\PTO Mod 08234 09 - PTO Incompleteness - 10-16-2023

ATTACHMENT

PTO MOD NO. 08234 09 INCOMPLETENESS ITEM LIST

1. **Potential to Emit.** Please respond with additional information regarding the completion of the plugging and abandonment (P&A) work. Based on correspondence from CSLC, additional remediation of the wells is required, pushing P&A completion into Q1 2024. Due to the remaining work, there may be a potential to emit.



August 31, 2023

Santa Barbara County APCD
260 N. San Antonio Rd. Suite A
Santa Barbara, CA 93110

Attn: William Sarraf

Subject: Permit to Operate (PTO) Mod Application for Removal of High-Pressure Flare and Data Acquisition System (DAS) Requirements from PTO 8234-R11

Dear Mr. Sarraf,

Please find enclosed the required PTO application documents to modify Platform Holly PTO 8234-R11 to remove: 1) the High-Pressure Flare (Device ID #7982) and associated permit condition 9.C.3, and 2) the DAS parameters associated with Platform Holly in Table 9.C.14-1 of the PTO.

The basis for this permit modification request is as follows:

- All production wells on Platform Holly have been plugged in accordance with CalGEM regulations. Therefore, there are no well production sources of hydrocarbon or H₂S emissions from Platform Holly.
- All platform production related equipment have been isolated, flushed and opened to atmosphere eliminating HC and H₂S emissions.
- The High-Pressure Flare was removed from service on June 10, 2023 as a result of cessation of natural gas supply from the Ellwood Onshore Facility (EOF).
- There is no remaining equipment or activities on Platform Holly which require vapor recovery.
- All equipment and activities associated with Platform Holly DAS parameters listed in Table 9.C.14-1 of PTO 8234-R11 have been permanently removed from service and are terminated.

Please note that DAS connectivity between Platform Holly and the District was inadvertently severed on August 4, 2023 as part of the overall de-coupling of Platform Holly from the EOF. Information from Platform Holly DAS parameters flowed through the EOF data logger, and there are no remaining connected systems between the platform and onshore facility.

The following is enclosed in this package:

1. Form APCD-01
2. Part 70 forms

Please debit the required filing fee from the Beacon West Ellwood reimbursable account. Feel free to contact me at (805) 395-9676 or john.garnett@beacon-west if you have any questions.

Sincerely,



John Garnett
EHSR Advisor

Enclosures Noted



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)

8234-R11

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 or email the completed application to the APCD's Engineering Division at the address listed above or permits@sbcapcd.org.

2. FILING FEE:

A \$491 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 submitting the Credit Card Authorization Form found here <https://www.ourair.org/wp-content/uploads/apcd-01c.pdf> via mail or calling 805-979-8050 to pay via phone.

Do not submit the Credit Card Authorization Form via email.

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	3105	Permit No.	PTO Mod 8234-09	Rec'vd 9/22/2023
Project Name	Platform Holly			
Filing Fee	\$491	202.E? YES / NO		

Billed 500000/205715 Beacon West

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	California State Lands Commission		
Doing Business As			
Contact Name	Jennifer Lucchesi	Position/Title	Executive Officer
Mailing Address	100 Howe Ave. Suite 100		
City	Sacramento	State	CA Zip Code 95825
Telephone	(916) 574-1800	Cell	
		Email	

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	California State Lands Commission/Beacon West Energy Group, LLC		
Doing Business As			
Contact Name	John Garnett	Position/Title	EHSR Advisor
Mailing Address	1145 Eugenia Pl. #101		
City	Carpinteria	State	CA Zip Code 93013
Telephone	(805) 395-9676	Cell	
		Email	john.garnett@beacon-west.com

Authorized Agent Info*		<input type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Telephone		Cell	
		Email	

*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 type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

oil & gas facility decommissioning

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	Platform Holly		
City	offshore of Goleta	State	CA Zip Code 93117
Work Site Phone	8059612360		

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

Assessors Parcel No(s):

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):

remove high pressure flare (Device ID #007982) and DAS conditions 9.C.14 and 9.C.15 from PTO 8234-R11.

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.

	8/14/2023
Signature of application preparer	Date
John Garnett	Beacon West Energy Group, LLC
Print name of application preparer	Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

- Application Filing Fee (Fee = \$456. 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 a *Credit Card Form-01C* <https://www.ourair.org/wp-content/uploads/apcd-01c.pdf> and submit it via mail or call 805-979-8050 to pay over the phone. **Do not submit the *Credit Card Form-01C* via email.**
- 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* (<https://www.ourair.org/wp-content/uploads/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, , am employed by or represent
Type or Print Name of Authorized Company Representative

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: Title:

Date: Phone:

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.

STATIONARY SOURCE SUMMARY

(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: California State Lands Commission

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Platform Holly
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): California State Lands Commission
4. Mailing Address of Responsible Official: 100 Howe Ave. Suite 100, Sacramento, CA 95825
5. Street Address of Source Location (include Zip Code): 2 miles offshore of Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within:

50 miles of the state line	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
50 miles of a Native American Nation	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: California State Lands Commission
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Jennifer Lucchesi Title: Executive Officer CSLC Telephone #: (916) 574-1800
12. Plant Site Manager/Contact: Howard Durler Title: Operations Supervisor Telephone #: (805) 961-2374
13. Type of facility: Oil & Gas Production
14. General description of processes/products: Oil & Gas Production
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: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input type="checkbox"/> Permit Renewal		
<input type="checkbox"/> Significant Permit Revision*		
<input checked="" type="checkbox"/> Minor Permit Revision*	PTO 8234-R11	December 2023
<input type="checkbox"/> 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:
 Remove high pressure flare (Device ID #007982) and DAS conditions 9.C.14 and 9.C.15 from Part 70 PTO 8234-R11.

* 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: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

I. TOTAL STATIONARY SOURCE EMISSIONS

POLLUTANT* (name)	POTENTIAL TO EMIT EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	107.58	108.36	-0.78
ROC	74.73	75.71	-0.98
CO	100.44	104.64	-4.20
PM	6.33	6.56	-0.23
PM-10	6.33	6.45	-0.23
SOx	1.78	3.57	-1.79

* 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.

CERTIFICATION STATEMENT

(Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS PROCESSING ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood 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 For Compliance Plan Form
 Compliance Plan Certification Form
 Exempt Equipment Form
 Certification Statement Form

List other forms or attachments

- _____

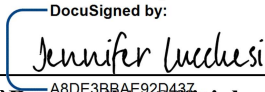
[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios
 Sample emission factors
 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.

DocuSigned by:


Signature of Responsible Official

9/21/2023

Date

Print Name of Responsible Official: Jennifer Lucchesi

Title of Responsible Official and Company Name: Executive Officer, State Lands Commission

**CERTIFICATION STATEMENT
(Form 1302-M continued)**

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

List Other Forms or Attachments (cont.)

- N/A



September 10, 2024

Santa Barbara County APCD
260 N. San Antonio Rd. Suite A
Santa Barbara, CA 93110

Attn: William Sarraf

Subject: Incomplete Permit to Operate Application 08234 09
FID: 03105
SSID: 01063

Dear Mr. Sarraf,

This correspondence serves as a response to the Incompleteness letter for the application for Permit to Operate (PTO Mod) No. 08234 09 received by the District on October 18, 2023. The PTO Mod was submitted to remove: 1) the High-Pressure Flare (Device ID #7982) and associated permit condition 9.C.3, and 2) the DAS parameters associated with Platform Holly in Table 9.C.14-1 of the PTO.

In response to the District Incompleteness letter we are providing the following information to demonstrate no potential to emit:

- Platform Holly well remediation work has been completed and all wells have been permanently plugged and abandoned with well conductor removal completed on September 4, 2024. Therefore, there are no well production sources of hydrocarbon or H₂S emissions from Platform Holly.
- All platform production related equipment has been isolated, depressured, drained and flushed, air-gapped and/or opened to atmosphere.
- The High-Pressure Flare and Low-Pressure flares have been removed from service. Propane pilot fuel removed from the platform.
- There is no remaining equipment or activities on Platform Holly which require vapor recovery.
- All equipment and activities associated with Platform Holly DAS parameters listed in Table 9.C.14-1 of PTO 8234-RII have been permanently removed from service and are terminated.

Beacon West provided edits/comments to remove the equipment and associated conditions discussed above from the Draft Pt-70 Renewal/PTO 08234-R12 on August 21, 2024.

I can be contacted at (805) 395-9656 or keith.wenal@beacon-west.com if you have any questions or need more information.

Sincerely,

Keith Wenal
Chief Compliance Officer
Beacon West Energy Group, LLC

CC: Joe Fabel - CSLC
Peter Regan - CSLC

October 18, 2023

Certified Mail
Read Receipt Requested 9171 9690 0935 0315 1516 23

John Garnett
Beacon West Energy Group
1145 Eugenia Place, Suite 101
Carpinteria, CA 93013

FID: 03105
Permit: PM 08234 09
SSID: 01063

Re: Incomplete Permit to Operate Application 08234 09

Dear John Garnett:

On September 22, 2023, the Santa Barbara County Air Pollution Control District (District) received your application for Permit to Operate (PTO Mod) No. 08234 09 for the removal of the high pressure flare and DAS conditions. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 979-8317. Thank you for your cooperation.

Sincerely,



Agnieszka Letts, Air Quality Engineer II
Engineering Division

Attachment: Incompleteness Items

cc: Platform Holly 03105 Project File
Engr Chron File
Agnieszka Letts

\\sbcped.org\shares\Groups\ENGR\WP\Oil&Gas\Major Sources\SSID 01063 Venoco - Ellwood\03105 Platform Holly\PTOs\PTO Mod 8234-09\PTO Mod 08234 09 - PTO Incompleteness - 10-16-2023

ATTACHMENT

PTO MOD NO. 08234 09 INCOMPLETENESS ITEM LIST

1. **Potential to Emit.** Please respond with additional information regarding the completion of the plugging and abandonment (P&A) work. Based on correspondence from CSLC, additional remediation of the wells is required, pushing P&A completion into Q1 2024. Due to the remaining work, there may be a potential to emit.

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

**CALIFORNIA STATE LANDS
COMMISSION**

301 E. Ocean Blvd., Suite 550
Long Beach, CA 90802-8833



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Contact Fax: 562.432.6035

September 16, 2024

Sent Electronically Only: harrisd@sbcapcd.org

File Ref.: Leases 3120.1, 3242.1

Davi Harris, Division Manager
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite A
Santa Barbara, CA 93110

**Subject: Completion of Permanent Plug and Abandonment of Wells, Leases
3120.1, 3242.1, Platform Holly Offshore Goleta, Santa Barbara County**

Dear David Harris,

This letter is to attest and certify that on September 3, 2024, the California State Lands Commission, as operator of Platform Holly offshore Goleta, Santa Barbara County, has completed the permanent plug and abandonment of all 30 well located on the platform, including the cutting and removal of each conductor casing previously linking the platform to the former oil and gas wells.

As of September 3, 2024, Platform Holly has no potential to produce oil or gas, including hydrogen sulfide gases which were the concern and risk identified within Permits to Operate and the 1999 abatement order by the District. We formally request that the District please consider this information in light of the Commission's applications before the District. Please do not hesitate to contact me if you have any questions.

Sincerely,

DocuSigned by:
Peter Regan
AEC65FD2888147B...

Peter Regan
Assistant Division Chief
Mineral Resources Management Division

Cc: keith.wenal@beacon-west.com, sarrafw@sbcapcd.org
tricia.winterbauer@beacon-west.com