

Newspaper notice for publication in Bakersfield Californian and for posting on  
valleyair.org

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**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Chevron USA, Inc. for the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

The analysis of the regulatory basis for this proposed action, Project #S-1122845, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and at any District office. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be submitted by July 2, 2014 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

**AVISO DE DECISIÓN PRELIMINAR  
PARA LA PROPUESTA OTORGACIÓN DE  
CERTIFICADOS DE CRÉDITOS DE REDUCCIÓN DE EMISIONES**

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de certificados de Créditos de Reducción de Emisiones (ERC, por sus siglas en inglés) a Chevron USA, Inc. para la clausura de tres motores de turbina de gas, en la planta North Midway Cogeneration en la fuente de producción de petróleo pesado en la parte oeste del Condado de Kern. Las cantidades de ERCs propuestas para almacenar son 9,447 lb-NOx/año, 51 lb-SOx/año, 3,388 lb-PM10/año, 6,356 lb-CO/año, 1,077 lb-VOC/año y 30,279 toneladas métricas de CO2e/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #S-1122845, está disponible para la inspección pública en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del 2 de Julio del 2014 a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

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# PUBLIC NOTICE CHECK LIST

PROJECT #: S-1129 PROJECT #: S-1122845

REQST. COMPL.

√ ✓  
√   
√ ✓

## ERC PRELIMINARY PUBLIC NOTICE

Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

Send email to "OA-PublicNotices" containing the following:

SUBJECT: facility name, facility id#, project #, type of notice (prelim/final)

BODY: project description and why it is being noticed (Emission Reduction Credit Banking)

## ENCLOSED DOCUMENTS REQUIRE:

√ ✓

Enter Correct Date, Print All Documents from File and Obtain Director's Signature

√ ✓

Determine date comment period will end, enter date on Newspaper Notice and Aviso en Español, and Email **PRELIMINARY** Newspaper Notice for Publication in Bakersfield Californian Pub Date: 6/2/14 Due Date: 7/2/14

√ ✓

Mail/email **PRELIMINARY** Notice Letter to Applicant (email address: lance.ericksen@chevron.com) with the following attachments:

√ Application Evaluation

√ Newspaper Notice

√ ✓

Email **PRELIMINARY** Public Notice package to EPA

√ ✓

Email **PRELIMINARY** Public Notice package to CARB

√ ✓

Email **PRELIMINARY** Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"

√ ✓

After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to:

√ specific [C, S, or N] region and District wide permitting notification list-serves (both English and Spanish list serves)

√ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): none

√ ✓

Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below):

NN/AE or  FPNP Name/address: none

NN/AE or  FPNP Name/address: none

√ ✓

Send **PRELIMINARY** Public Notice package to EDMS

— —

Other Special Instructions (please specify): \_\_\_\_\_

Date Completed May 13, 2014/By Stephen Leonard

## **Diane Gaitan**

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**From:** Diane Gaitan  
**Sent:** Wednesday, May 28, 2014 2:10 PM  
**To:** 'lance.ericksen@chevron.com'  
**Subject:** Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845  
**Attachments:** Prelim S-1122845.pdf; Newspaper Notice.pdf  
**Importance:** High

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Chevron USA, Inc. for the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO<sub>2</sub>e/yr.

### ***Diane M. Gaitan***

San Joaquin Valley Air Pollution Control District  
Voice: (559) 230-6000  
Fax: (559) 230-6061  
E-mail: [diane.gaitan@valleyair.org](mailto:diane.gaitan@valleyair.org)

Service Teamwork Attitude Respect



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[www.healthyairliving.com](http://www.healthyairliving.com)

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**Diane Gaitan**

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**From:** Microsoft Outlook  
**To:** 'lance.ericksen@chevron.com'  
**Sent:** Wednesday, May 28, 2014 2:11 PM  
**Subject:** Relayed: Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'lance.ericksen@chevron.com' ([lance.ericksen@chevron.com](mailto:lance.ericksen@chevron.com)) <<mailto:lance.ericksen@chevron.com>>

**Subject:** Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845

## **Diane Gaitan**

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**From:** Diane Gaitan  
**Sent:** Wednesday, May 28, 2014 2:11 PM  
**To:** Gerardo Rios (SJV\_T5\_Permits@epamail.epa.gov); Mike Tollstrup (mtollstr@arb.ca.gov)  
**Subject:** Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845  
**Attachments:** Prelim S-1122845.pdf; Newspaper Notice.pdf  
**Importance:** High

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Gerardo Rios ([SJV\\_T5\\_Permits@epamail.epa.gov](mailto:SJV_T5_Permits@epamail.epa.gov)) ([SJV\\_T5\\_Permits@epamail.epa.gov](mailto:SJV_T5_Permits@epamail.epa.gov))  
<[mailto:SJV\\_T5\\_Permits@epamail.epa.gov](mailto:SJV_T5_Permits@epamail.epa.gov)>

**Subject:** Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845

**Diane Gaitan**

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**From:** Microsoft Outlook  
**To:** Mike Tollstrup (mtollstr@arb.ca.gov)  
**Sent:** Wednesday, May 28, 2014 2:11 PM  
**Subject:** Relayed: Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Mike Tollstrup ([mtollstr@arb.ca.gov](mailto:mtollstr@arb.ca.gov)) ([mtollstr@arb.ca.gov](mailto:mtollstr@arb.ca.gov)) <<mailto:mtollstr@arb.ca.gov>>

**Subject:** Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845



## **Diane Gaitan**

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**From:** Diane Gaitan  
**Sent:** Wednesday, May 28, 2014 2:14 PM  
**To:** WebTeam  
**Subject:** valleyair.org update: Notice of Preliminary Decision Emission Reduction Credits for Chevron USA, Inc. Facility S-1129 Project S-1122845  
**Attachments:** Prelim S-1122845.pdf; Newspaper Notice.pdf; Aviso.pdf  
**Importance:** High

May 28, 2014 (Facility S-1129 Project S-1122845) NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Chevron USA, Inc. for the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr. The comment period ends on July 2, 2014.

Newspaper Notice

Aviso

Public Notice Package

***Diane M. Gaitan***

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## **Diane Gaitan**

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**From:** Diane Gaitan  
**Sent:** Thursday, May 29, 2014 12:02 PM  
**To:** 'All Region (Notices\_of\_Permitting\_Actions-All\_Regions@lists.valleyair.org)'; 'South (Notices\_of\_Permitting\_Actions-Southern\_Region@lists.valleyair.org)'  
**Subject:** Public Notice on Permitting Action S-1122845

The District has posted a new permitting public notice. The public notice can be viewed on our website at: [http://www.valleyair.org/notices/Docs/2014/05-28-14\\_\(S-1122845\)/Newspaper.pdf](http://www.valleyair.org/notices/Docs/2014/05-28-14_(S-1122845)/Newspaper.pdf)

For a list of public notices and public notice packages, please visit our website at: [http://www.valleyair.org/notices/public\\_notices\\_idx.htm#PermittingandEmissionReductionCreditCertificateNotices](http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices)

Thank you.

***Diane M. Gaitan***

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**From:** Diane Gaitan  
**Sent:** Thursday, May 29, 2014 12:02 PM  
**To:** 'All Spanish (Avisos\_Sobre\_Acciones\_de\_Permisos-Todos@lists02.valleyair.org)'  
**Subject:** Aviso Publico Sobre Acciones de Permisos S-1122845

El Distrito del Aire a publicado un nuevo aviso público de permiso. El aviso público se puede ver en nuestro sitio de web en: [http://www.valleyair.org/notices/Docs/2014/05-28-14\\_\(S-1122845\)/Aviso.pdf](http://www.valleyair.org/notices/Docs/2014/05-28-14_(S-1122845)/Aviso.pdf)

Para obtener una lista de avisos públicos y paquetes de avisos públicos, por favor visite nuestro sitio de web en: [http://www.valleyair.org/notices/public\\_notices\\_idx.htm#PermittingandEmissionReductionCreditCertificateNotices](http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices)

Gracias

### ***Diane M. Gaitan***

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**CALIFORNIA NEWSPAPER SERVICE BUREAU**

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*Proof of Reader's Copy*

Diane Gaitan  
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST  
1990 E. GETTYSBURG AVE.  
FRESNO, CA 93726

CNS 2628634

**COPY OF NOTICE**

Notice Type: GPN GOVT PUBLIC NOTICE  
Ad Description: ERC Prelim Chevron USA, Inc., Bakersfield Californian

To the right is a copy of the notice you sent to us for publication in the THE BAKERSFIELD CALIFORNIAN. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

06/02/2014

**NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Chevron USA, Inc. for the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

The analysis of the regulatory basis for this proposed action, Project #S-1122845, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and at any District office. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be submitted by July 2, 2014 to ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.  
6/2/14  
CNS-2628634#  
THE BAKERSFIELD CALIFORNIAN

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| DAILY COMMERCE, LOS ANGELES                | (213) 229-5300 |
| LOS ANGELES DAILY JOURNAL, LOS ANGELES     | (213) 229-5300 |
| ORANGE COUNTY REPORTER, SANTA ANA          | (714) 543-2027 |
| SAN DIEGO COMMERCE, SAN DIEGO              | (619) 232-3486 |
| SAN FRANCISCO DAILY JOURNAL, SAN FRANCISCO | (800) 640-4829 |
| SAN JOSE POST-RECORD, SAN JOSE             | (408) 287-4866 |
| THE DAILY RECORDER, SACRAMENTO             | (916) 444-2355 |
| THE INTER-CITY EXPRESS, OAKLAND            | (510) 272-4747 |



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**AVISO DE DECISIÓN PRELIMINAR  
PARA LA PROPUESTA OTORGACIÓN DE  
CERTIFICADOS DE CRÉDITOS DE REDUCCIÓN DE EMISIONES**

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de certificados de Créditos de Reducción de Emisiones (ERC, por sus siglas en inglés) a Chevron USA, Inc. para la clausura de tres motores de turbina de gas, en la planta North Midway Cogeneration en la fuente de producción de petróleo pesado en la parte oeste del Condado de Kern. Las cantidades de ERCs propuestas para almacenar son 9,447 lb-NOx/año, 51 lb-SOx/año, 3,388 lb-PM10/año, 6,356 lb-CO/año, 1,077 lb-VOC/año y 30,279 toneladas métricas de CO2e/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #S-1122845, está disponible para la inspección pública en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del 2 de Julio del 2014 a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

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The analysis of the regulatory basis for this proposed action, Project #S-1122845, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and at any District office. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be submitted by July 2, 2014 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



## HEALTHY AIR LIVING™

MAY 28 2014

Gregory Pritchett  
Chevron USA, Inc.  
PO Box 1392  
Bakersfield, CA 93302

**Re: Notice of Preliminary Decision – Emission Reduction Credits**  
**Facility Number: S-1129**  
**Project Number: S-1122845**

Dear Mr. Pritchett:

Enclosed for your review and comment is the District's analysis of Chevron USA, Inc.'s application for Emission Reduction Credits (ERCs) resulting from the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Stephen Leonard of Permit Services at (661) 392- 5605.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

AM:SPL/st

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



## II. Applicable Rules:

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)  
Rule 2301 Emission Reduction Credit Banking (1/19/12)  
Rule 4703 Stationary Gas Turbines (9/20/07)

## III. Location of Reduction:

The physical location of the equipment involved with this application is as follows:

Permit Unit	Section	Township	Range
S-1129-53	34	30 South	22 East
S-1129-54	34	30 South	22 East
S-1129-55	34	30 South	22 East

## IV. Method of Generating Reductions:

The emission reductions are generated by the permanent shutdown of the three North Midway Cogeneration unit turbines, District permit units S-1129-53, '-54, & '-55. The applicant surrendered the Permits to Operate (PTOs) for the associated equipment with this application on July 19, 2012.

## V. Calculations:

### A. Assumptions and Emission Factors

#### Assumptions:

- GTEs "dormant" prior to January 1, 2012
- North Midway Cogeneration Plant historically operated one or more GTEs for 24 hours/day, 7 days/week (District Permit)
- GTEs combusted on PUC quality natural gas (District Permit)
- North Midway GTEs permitted as "non-compliant dormant" since before the final compliance deadline for District Rule 4703 "Stationary Gas Turbines" of January 1, 2012 (District Permit)
- Two-year baseline period selected for documentation of AER is 10/01/2008 through 9/30/2010
- Source testing for NO<sub>x</sub>, CO, fuel sulfur limit, and SO<sub>x</sub> as SO<sub>2</sub> were performed annually



- Actual emissions are defined in Rule 2201 as, "emissions having occurred from a source, based on source test or monitoring data, actual fuel consumption, and process data. If source test or monitoring data is not available, other appropriate, APCO-approved, emission factors may be used".

Emission Factors:

- District Rule 4703 "Stationary Gas Turbines" would require 5 ppmv NO<sub>x</sub> @ 15% O<sub>2</sub> (0.0184 lb-NO<sub>x</sub>/MMBtu) if operated past the Tier 3 compliance deadlines, as described in Section 7.3 of this rule, so 5 ppmv NO<sub>x</sub> @ 15% O<sub>2</sub> is used to determine AER during baseline period to ensure only "surplus" reductions are credited
- CO and SO<sub>2</sub> emission factors are based on averaged results of GTE source tests during baseline period (see Appendix E for summary of source test results)
- PM<sub>10</sub> and VOC emission factors are based on USEPA AP-42, Fifth Edition, Chapter 3, "Stationary Internal Combustion Sources, Section 3.1, Table 3.1-2a, April, 2000 (see Appendix F for Table 3.1-2a)

Emission factors from the "California Air Resources Board Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, Appendix A" are used to quantify CO<sub>2</sub>e. The emission factors are as follows:

Carbon Dioxide – Natural Gas Combustion: 53.02 Kg-CO<sub>2</sub>/MMBtu  
Methane – Natural Gas Combustion: 0.0009 Kg-CH<sub>4</sub>/MMBtu  
Nitrous Oxide – Natural Gas Combustion: 0.0001 Kg-N<sub>2</sub>O/MMBtu

District Rule 2301, "Emission Reduction Credit Banking", Table 1 conversion factors are used to convert carbon dioxide, methane and nitrous oxide emissions to CO<sub>2</sub>e. The conversion factors are as follows:

Carbon Dioxide: 1 Metric Ton per 1 Metric Ton CO<sub>2</sub>  
Methane: 21 Metric Ton CO<sub>2</sub>e per 1 Metric Ton CH<sub>4</sub>  
Nitrous Oxide: 310 Metric Ton CO<sub>2</sub>e per 1 Metric Ton N<sub>2</sub>O

The GHG emission factors and CO<sub>2</sub>e conversion factors are combined as follows to give an overall emission factor of CO<sub>2</sub>e:

$$\text{Carbon Dioxide: } (53.02 \text{ Kg-CO}_2/\text{MMBtu})(1 \text{ Mt CO}_2\text{e/Mt CO}_2)(1 \text{ Mt}/1000 \text{ Kg}) \\ = \mathbf{0.05302 \text{ Mt CO}_2\text{e/MMBtu}}$$

$$\text{Methane: } (0.0009 \text{ Kg-CH}_4/\text{MMBtu})(21 \text{ Mt CO}_2\text{e/Mt CH}_4)(1 \text{ Mt}/1000 \text{ Kg}) \\ = \mathbf{0.000019 \text{ Mt CO}_2\text{e/MMBtu}}$$

$$\text{Nitrous Oxide: } (0.0001 \text{ Kg-N}_2\text{O/MMBtu})(310 \text{ Mt CO}_2\text{e/MT N}_2\text{O})(1 \text{ Mt}/1000 \text{ Kg}) \\ = \mathbf{0.000031 \text{ Mt CO}_2\text{e/MMBtu}}$$

Therefore, the overall CO<sub>2</sub>e emission factor equals:

$$(0.05302 \text{ Mt CO}_2\text{e/MMBtu}) + (0.000019 \text{ Mt CO}_2\text{e/MMBtu}) + (0.000031 \text{ Mt CO}_2\text{e})$$

$$= \mathbf{0.05307 \text{ Mt CO}_2\text{e/MMBtu}}$$

Emission factors for calculating AER during baseline period

Permit Unit	NO <sub>x</sub> (lb/MMBtu)	SO <sub>x</sub> (lb/MMBtu)	PM <sub>10</sub> (lb/MMBtu)	CO (lb/MMBtu) <sup>®</sup>	VOC (lb/MMBtu)	CO <sub>2</sub> e (Mt/MMBtu)
S-1129-53	0.0184	0.0001	0.0066	0.0130*	0.0021	0.05302
S-1129-54	0.0184	0.0001	0.0066	0.0126*	0.0021	0.05302
S-1129-55	0.0184	0.0001	0.0066	0.0078**	0.0021	0.05302

<sup>®</sup>Equivalent lb/MMBtu for calculation purposes

\*Average of three source test results 2008 – 2010

\*\*Average of two source test results 2008 - 2009

### B. Baseline Period Determination and Data

CUSA submitted the application to the District on July 19, 2012.

Pursuant to District Rule 2201, Section 3.8, the baseline period for determining HAE shall be a period of time equal to either:

- 3.8.1 The two consecutive years of operation immediately prior to the submission date of the complete application; or
- 3.8.2 at least two consecutive years within the five years immediately prior to the submission date of the complete application if determined by the APCO as more representative of normal source operation; or
- 3.8.3 a shorter period of at least one year if the emissions unit has not been in operation for two years and this represents the full operational history of the emissions unit, including any replacement units; or
- 3.8.4 Zero years if an emissions unit has been in operation for less than one year (only for use when calculating AER).

For the purposes of this section, the submission of the complete application is considered to be July 19, 2012.

During the five year period immediately preceding the shutdown of the North Midway gas turbine engines, the two-year period which most closely matches the historic two year average fuel usage of the turbines, when combined, is the period of October 1, 2008 through September 30, 2010. This period is selected as the baseline period for purposes of determining historical actual emissions.

**C. Historical Actual Emissions (See Appendix G for calculations spreadsheet)**

**Gas Turbine Engine S-1129-53 (CG-7)**

<b>Criteria Emissions During Baseline Period (lb/qtr)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
1st Quarter	966	5	346	682	110
2nd Quarter	691	4	248	488	79
3rd Quarter	865	5	310	611	99
4th Quarter	1,246	7	447	880	142

<b>CO<sub>2</sub>e emissions (Mt/qtr)</b>				
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
CO <sub>2</sub> e	2,785	1,993	2,494	3,594
<b>Mt/year</b>				<b>10,865</b>

**Gas Turbine Engine S-1129-54 (CG-8)**

<b>Criteria Emissions During Baseline Period (lb/qtr)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
1st Quarter	1,053	6	378	721	120
2nd Quarter	1,464	8	525	1,003	167
3rd Quarter	1,700	9	610	1,164	194
4th Quarter	1,715	9	615	1,174	196

<b>CO<sub>2</sub>e emissions (Mt/qtr)</b>				
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
CO <sub>2</sub> e	3,036	4,223	4,902	4,947
<b>Mt/year</b>				<b>17,107</b>

**Gas Turbine Engine S-1129-55 (CG-9)**

<b>Criteria Emissions During Baseline Period (lb/qtr)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
1st Quarter	185	1	66	79	21
2nd Quarter	420	2	151	178	48
3rd Quarter	36	0	13	15	4
4th Quarter	158	1	57	67	18

<b>CO<sub>2</sub>e emissions (Mt/qtr)</b>				
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
CO <sub>2</sub> e	534	1,211	105	457
<b>Mt/year</b>				<b>2,306</b>

**D. Adjustments to HAE**

Pursuant to Section 3.22 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is:

- Required or encumbered by any laws, rules, regulations, agreements, orders, or
- Attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- Proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.
- Any Actual Emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits. For units covered by a Specific Limiting Condition (SLC), the total overall HAE for all units covered by SLC must be discounted for any emissions in excess of that allowed by the SLC.

**Adjustment for Rule 2201 – New and Modified Stationary Source Review Rule:**

No adjustment to the calculated HAEs above is necessary for NSR purposes (Rule 2201)

**Adjustment for Rule 4201 – Particulate Matter Concentration:**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

Particulate matter emissions from the engine will be less than or equal to the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions as shown by the following:

For the 48.7 MMBtu/hr gas turbine engines CG-7, CG-8, and CG-9, the permitted PM<sub>10</sub> emissions = 0.61 lb-PM<sub>10</sub>/hr = 0.0125 lb-PM<sub>10</sub>/MMBtu

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

$$0.0125 \frac{lb}{10^6 Btu} \times \frac{453.6 g}{1 lb} \times \frac{10^6 Btu}{8,710 dscf} \times \frac{0.35 Btu_{out}}{1 Btu_{in}} \times \frac{15.43 grain}{g} = 0.0035 \frac{grain}{dscf}$$

The permitted emission factors used to calculate the PM emission concentration from the gas turbine engines meet the requirements for this rule and no adjustment is necessary.

**Adjustment for Rule 4703 – Stationary Gas Turbine Engines:**

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx) from stationary gas turbine engines.

Rule 4703 requires an emission limit of 5 ppmv NO<sub>x</sub> @ 15% O<sub>2</sub> (0.0184 lb-NO<sub>x</sub>/MMBtu) if operated past the Tier 3 compliance deadlines, as described in Section 7.3 of this rule, so 5 ppmv NO<sub>x</sub> @ 15% O<sub>2</sub> was used to determine AER during the baseline period to ensure only "surplus" reductions are credited.

**E. Actual Emissions Reductions (AERs):**

The total qualifying AERs are shown in the table below:

Qualifying AER During Baseline Period (lb/qtr)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
1st Quarter	2,204	12	790	1,482	251
2nd Quarter	2,575	14	924	1,669	294
3rd Quarter	2,600	14	933	1,790	297
4th Quarter	3,119	17	1,119	2,122	356

CO <sub>2</sub> e emissions (Mt/year)	
	(Mt/year)
CO <sub>2</sub> e	30,279

**F. Air Quality Improvement Deduction (Criteria Pollutants)**

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, Sections 3.5 and 4.12.1, and is summarized as follows:

Air Quality Improvement Deduction (AQID) lb/qtr (AQID = AER x 10%)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
1st Quarter	220	1	79	148	25
2nd Quarter	257	1	92	167	29
3rd Quarter	260	1	93	179	30
4th Quarter	312	2	112	212	36

**G. Increases in Permitted Emissions (IPE)**

No IPE is associated with this project.

**H. Bankable Emissions Reductions Credits**

The bankable emissions reductions credits, presented in following table, are determined by subtraction of the Air Quality Improvement Deduction (discussed in Section V.F) from the AER.

<b>Bankable Emissions Reductions Credits</b>					
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM10</b>	<b>CO</b>	<b>VOC</b>
<b>1st Quarter</b>	1,983	11	711	1,333	226
<b>2nd Quarter</b>	2,317	13	831	1,502	264
<b>3rd Quarter</b>	2,340	13	839	1,611	267
<b>4th Quarter</b>	2,807	15	1,007	1,910	320

## **VI. Compliance:**

### **Rule 2201 - New and Modified Stationary Source Review Rule:**

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1), the reductions must be real, enforceable, quantifiable, permanent, and surplus.

#### **A. Real**

The emissions reductions were generated by the shutdown of the three gas turbine engines at Chevron's North Midway cogeneration facility. The emissions reductions were calculated from actual historic data and recognized emission factors or source test data. The associated permits for these units have been surrendered to the District. Therefore, the emission reductions are real.

#### **B. Enforceable**

The PTO's for the three gas turbine engines have been surrendered to the District. Operation of any of the equipment without a valid permit would subject the Permittee to enforcement actions. Therefore, the reductions are enforceable.

#### **C. Quantifiable**

The reductions are quantifiable since they were calculated from historic production and fuel use data, source testing data, established and accepted emission factors, permitted limits, and methods according to District Rule 2201. Therefore, the reductions are quantifiable.

#### **D. Permanent**

The three gas turbine engines have been shut down and the PTOs have been surrendered to the District. Any subsequent installations of new equipment to replace the heat or power once generated by the GTEs will have to be fully offset through the Rule 2201 New Source Review permitting process. There are no other gas turbines in the area to perform the functions of the units that have been shut down, so there will be no shifting of emissions to other existing units performing the same tasks. Therefore, the reductions are permanent.

## **E. Surplus**

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- *Is required or encumbered by any laws, rules, regulations, agreements, orders, or*
- *Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or*
- *Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.*

At the time of the shutdown and subsequent permit surrender, all the units involved were in compliance with current and any known future requirements of all applicable rules and regulations. Therefore, the reductions are surplus.

## **F. Not used for the Approval of an Authority to Construct or as Offsets**

The emission reduction credits generated by the shutdown of the three gas turbine engines were not used for the approval of any Authority to Construct or used as mitigating offsets for approval of other equipment.

### **Rule 2301 – Emission Reduction Banking:**

Section 5.5 states that ERC certificate applications shall be submitted within 180 days after the emission reduction occurs. The applicant ceased operation of the equipment at this location in December of 2011. Although capable of resuming operation, the Permit to Operate for each turbine was surrendered when the ERC application was received on July 19, 2012. Therefore, the application was submitted in a timely fashion.

Section 6.1.2 states that if the emission reductions were created as a result of the shutdown of a permitted emissions unit, the relevant Permit(s) to Operate have been surrendered and voided. The Permits to Operate were surrendered with the application submittal and were canceled by the District on May 9, 2014.

### **For the GHG Reductions associated with this project:**

Per District Rule 2301, Section 4.5, the following criteria must be met in order to deem such reductions eligible for banking:

- 4.5.1** The greenhouse gas emission reduction must have actually occurred on or after January 1, 2005, except as allowed in specific CARB approved GHG emission reduction project protocols.

The emission reductions occurred with the permanent cessation of emissions on December 29, 2011. As the emissions reduction occurred after 1/1/05, this criterion has been satisfied.

- 4.5.2** The greenhouse gas emission reductions must have occurred within the San Joaquin Valley Unified Air Pollution Control District.

The emissions occurred at Kern River Oilfield within Chevron's Kern County Heavy Oil Western stationary source. Since this location is within the District, this criterion has been satisfied.

- 4.5.3** The greenhouse gas emission reductions are real, surplus, permanent, quantifiable, and enforceable, except as provided in Section 4.5.5.

**Real:**

The GHG emission reductions were generated by the shutdown of three gas turbine engines (S-1129-53, '-54, and '-55). The real emissions were calculated from actual historic fuel use data and recognized emission factors. The gas turbines have been removed from service and the permits have been canceled. Therefore, the emission reductions are real.

**Surplus:**

The facility is subject to the California Air Resources Board (CARB) Cap and Trade regulation; however, the reductions occurred prior to January 1, 2012; therefore, the emission reductions satisfy the surplus requirement in Section 4.5.3.1.

The reductions did not occur as a result of any law, rule, or regulation that required the greenhouse gas emission reduction. Therefore, the emission reductions satisfy the surplus requirement in Section 4.5.3.2.

The emission reductions are not the result of an action taken by the Permittee to comply with any requirement. The emission reductions credited are surplus to all requirements. Therefore, the emission reductions satisfy the surplus requirement in section 4.5.3.3.

**Permanent:**

The gas turbines have been shut down and the PTOs have been surrendered.

When determining the geographical boundary in which the emission reduction is determined to be permanent, the applicant may consider how the GHG ERC may likely be used.



Please note that the while Rule 2301 allows facilities to receive ERCs for GHG emission reductions; the District does not have any requirements on the use of GHG ERCs. However, it is anticipated that the likely use of such GHG ERCs would be their future retirement as GHG mitigation in the CEQA process.

Pursuant to CEQA, lead agencies must consider the environmental impact of GHG emissions from a project and may require that such GHG emissions be mitigated. In evaluating various mitigation techniques, including the retirement of GHG ERCs, the lead agency must determine if the proposed mitigation technique adequately mitigates the projects GHG emission increase.

When a lead agency determines if the retirement of a particular GHG ERC provides adequate GHG mitigation for a project, the lead agency may choose to consider the location where the GHG ERC was generated and the geographical boundary used to determine the permanence of the emission reduction. Then in making this determination, the lead agency may conclude that the retirement of a particular GHG ERC would provide adequate mitigation for projects within that same geographical boundary. Again, that determination will be made by the lead agency for a particular project.

For this application, the facility has selected California as the geographical boundary for which the emission reduction is permanent. Chevron has provided a graph showing the decline in California Oil Production from 1995 to 2012 (see Appendix C). Additionally, Chevron is an entity covered by California CAP and Trade (AB32), AB 32 requires California to return to 1990 levels of greenhouse gas emissions by 2020. Therefore, Chevron will have to mitigate a 15% reduction in greenhouse gas emissions compared to the 'business-as-usual' scenario in 2020. This information validates California as the geographical boundary selection for a permanent GHG emission reduction.

**Quantifiable:**

The actual emissions were calculated from historic fuel-use records and accepted emission factors. Therefore, the emission reductions are quantifiable and have been quantified.

**Enforceable:**

The gas turbines have been shut down and the PTOs have been surrendered to the District and canceled. Operation of the equipment

without a valid permit would subject the Permittee to enforcement action. Therefore, the emission reductions are enforceable.

- 4.5.4** Greenhouse gas emission reductions are calculated as the difference between the historic annual average greenhouse gas emissions (as CO<sub>2</sub>E) calculated using the consecutive 24 month period immediately prior to the date the emission reduction occurred, or another consecutive 24 month period in the 60 months prior to the date the emission reduction occurred if determined by the APCO as being more representative of normal operations, and the potential greenhouse gas emissions (as CO<sub>2</sub>E) after the project is complete, except as provided in section 4.5.5.

The GHG emission reductions were calculated according to the baseline period identified above. Since this is a permanent shutdown of the gas turbine engines, with none of the load being shifted to other units in California, there is no post-project potential to emit GHG.

- 4.5.5** Greenhouse gas emission reductions proposed to be quantified using CARB approved emission reduction project protocols shall be calculated in accordance with the applicable protocol.

Since the GHG emission reductions are not subject to an applicable CARB-approved emission reduction project protocol, this section is not applicable.

- 4.5.6** Emission reduction credits shall be made enforceable through permit conditions. If the District, pursuant to state laws, is prohibited from permitting the emission unit, the source creating the greenhouse gas emission reduction shall execute a legal binding contract with the District which ensures that the emission reductions will be generated in accordance with the provisions of this rule.

The gas turbine engines held legal District operating permits. Said permits have been surrendered to the District. Since the operation of the gas turbines would require a new Authority to Construct, the emission reduction is enforceable.

**Section 5** identifies ERC Certificate application procedures.

**Section 5.5.2** requires, for emission reductions occurring prior to 1/19/12, applications for ERCs must be submitted by 7/19/12.

The application was submitted on July 19, 2012. Therefore, the application is timely.

**Section 6.15** specifies the registration requirements for GHG ERCs.

**Section 6.15.13** requires the emission reductions are surplus and additional of all requirements pursuant to Section 4.5.3.4. Therefore the ERC certificate shall include the following notation:

"This emission reduction is surplus and additional to all applicable regulatory requirements."

Compliance with Rule 2301 has been demonstrated and no adjustments are required under this Rule.

**VII. Recommendation:**

Issue Emission Reduction Credit (ERC) Certificates S-4211-1, '-2, '-3, '-4, and '-5 in the amounts shown below and on the draft ERC certificate contained in Appendix A.

	<b>NO<sub>x</sub></b> [lb/qtr]	<b>SO<sub>x</sub></b> [lb/qtr]	<b>PM<sub>10</sub></b> [lb/qtr]	<b>CO</b> [lb/qtr]	<b>VOC</b> [lb/qtr]	<b>CO<sub>2</sub>e</b> [Mt/year]
1 <sup>st</sup> Quarter	1,983	11	711	1,333	226	
2 <sup>nd</sup> Quarter	2,317	13	831	1,502	264	
3 <sup>rd</sup> Quarter	2,340	13	839	1,611	267	
4 <sup>th</sup> Quarter	2,807	15	1,007	1,910	320	
Mt/year						30,279

**List of Appendices**

- A. Draft ERC Certificates
- B. Surrendered Permits to Operate
- C. Graph of California Field Production of Crude Oil
- D. North Midway GTE Fuel Usage during Baseline Period
- E. Summary of GTE Source Test Results during Baseline Period
- F. AP-42, Chapter 3, Section 3.1, Table 3.1-2a
- G. Calculation Spreadsheet of Historical Actual Emissions and Bankable Emissions

# **Appendix A**

## **Draft ERC Certificates**

San Joaquin Valley  
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

**Emission Reduction Credit Certificate**

**S-4304-1**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For VOC Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
226 lbs	264 lbs	267 lbs	320 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

**Emission Reduction Credit Certificate**

**S-4304-2**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For NOx Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,983 lbs	2,317 lbs	2,340 lbs	2,807 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

**Emission Reduction Credit Certificate**

**S-4304-3**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For CO Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,333 lbs	1,574 lbs	1,590 lbs	1,907 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

**Emission Reduction Credit Certificate**

**S-4304-4**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For PM10 Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
711 lbs	831 lbs	839 lbs	1,007 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director, APSCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services



San Joaquin Valley  
Air Pollution Control District

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**Emission Reduction Credit Certificate**

**S-4304-5**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For SOx Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
11 lbs	13 lbs	13 lbs	15 lbs

Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

**Emission Reduction Credit Certificate**

**S-4304-24**  
**DRAFT**

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: <DRAFT>  
LOCATION OF REDUCTION: HEAVY OIL WESTERN  
CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For CO2E Reduction In The Amount Of:**

**30,279 metric tons / year**

Conditions Attached

**Method Of Reduction**

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

**Emission Reduction Qualification Criteria**

Seyed Sadredin, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

## **Appendix B**

### **Surrendered Permits to Operate**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1129-53-11

EXPIRATION DATE: 02/29/2016

SECTION: 34 TOWNSHIP: 30S RANGE: 22E

## EQUIPMENT DESCRIPTION:

3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION NORTH MIDWAY UNIT #7

## PERMIT UNIT REQUIREMENTS

---

1. Units shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(a) & (b); 60.332(a); Kern County Rule 407] Federally Enforceable Through Title V Permit
2. Gas turbine shall be fired exclusively with PUC-quality natural gas or equivalent with total sulfur content of less than or equal to 1.0 gr S/100 scf of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge, 0.1 gr/dscf. [District Rule 4201; Kern County Rule 404] Federally Enforceable Through Title V Permit
4. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or Double GC for H<sub>2</sub>S and Mercaptans. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
5. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.335(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
6. Nitrogen oxides (NO<sub>x</sub>) concentrations shall be determined using EPA Method 7E or 20, and oxygen (O<sub>2</sub>) concentrations shall be determined using EPA Method 3, 3A, or 20. [40 CFR 60.335(b) and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
7. The operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> concentration corrected to 15% O<sub>2</sub> (dry). [40 CFR 60.332(a), (b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
8. Carbon monoxide (CO) concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
9. If the turbine is fired on PUC-regulated natural gas, then the operator shall maintain a log describing the source of natural gas and the quantity used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, source(s) of and quantity of fuel used, fuel sulfur content and fuel nitrogen content. [40 CFR 60.332(a),(b); District Rules 2520, 9.3.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall install, operate and maintain in calibration a predictive emissions monitoring system which continuously measures and records the water-to-fuel ratio and which correlates the water-to-fuel ratio with the NOx concentration in the exhaust by using the method described in 40 CFR 60.335(c). [Rule 4703, 6.2.1 and 40 CFR 60.334] Federally Enforceable Through Title V Permit
13. Permittee shall submit to the APCO the information correlating the control system operating parameters to the associated measured NOx output. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
14. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
15. Permittee shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form to the APCO semiannually, except when more frequent reporting is specifically required by an applicable subpart. All reports shall be postmarked by the 30th day of each calendar half (or quarter, as appropriate). [40 CFR 60.7(c)] Federally Enforceable Through Title V Permit
16. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate NSPS NOx compliance shall be reported to the APCO. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit
17. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401, 5.0] Federally Enforceable Through Title V Permit
18. Cogeneration unit shall include 48.7 MMBtu/hr (nominal rating) Allison, model 501-KB-5, gas-fired turbine engine with pilotless fuel nozzles or conventional fuel nozzles, Ideal Synchronous electrical generator, Struthers-Wells unfired 22.5 MMBtu/hr steam generator and an inlet air evaporative cooler. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Turbine lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Generator gearbox lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Permittee shall notify the District by fax or in writing prior to or within 4 hours of any turbine nozzle replacement, except for identical replacement. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Gas turbine engine shall be equipped with continuously recording fuel gas flow rate monitor. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Gas turbine engine shall be equipped with operational water injection system for NOx control. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Gas turbine engine shall be equipped with continuously recording water injection rate monitor accurate to within 5%. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Gas turbine engine water injection rate shall be maintained at a water to fuel ratio no less than 0.48/1.0 by weight while operating with pilotless fuel nozzles and no less than 0.8/1.0 by weight while operating with conventional fuel nozzles. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Evaporative cooler shall use only fresh and filtered water. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Fiber bed filter system shall be maintained and operated in accordance with the manufacturer's plans and specifications. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

29. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Except during periods of startup/shutdown, emission rates (3 hr average) shall not exceed: PM10: 0.61 lb/hr; SOx (as SO2): 0.16 lb/hr; NOx: 42 ppmvd @ 15% O2; VOC: 1.65 lb/hr; and CO: 41 ppmvd @ 15% O2. [District Rules 2201 and 4703, 5.1] Federally Enforceable Through Title V Permit
31. Except during periods of startup/shutdown, NOx emission rate (3 hr average) shall not exceed 35 ppmvd NO2 @ 15% O2. [District Rule 4703, 5.2]
32. Emissions shall not exceed the following: PM10: 14.6 lb/day; SOx (as SO2): 3.3 lb/day; NOx (as NO2): 153.0 lb/day; VOC: 39.6 lb/day; and CO: 107.8 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. NOx and SOx emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O2, and 150 ppmv-dry @ 15% O2, respectively. [District Rule 2520, 9.3.2; 40 CFR 60.332(c); 40CFR 60.333(a)] Federally Enforceable Through Title V Permit
34. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption in gas turbine for normal operation and startup/shutdown periods. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Compliance testing of lube oil vent and gearbox vent shall be required if monthly visible emissions checks from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
36. Thermal stabilization period shall be defined as the start-up or shutdown time necessary to bring the heat recovery steam generator to proper temperature, not exceeding two hours. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Startup and shutdown of gas turbine engine shall not exceed a time period of two hours and two hours, respectively, per occurrence. [40 CFR Subpart A 60.2, District Rule 4703, and District NSR Rule] Federally Enforceable Through Title V Permit
38. Permittee shall keep accurate records of fuel sulfur content, and such records shall be made available for District inspection for five years. [40 CFR 60.334(b)(2), District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. Annual compliance with GTE NOx and CO emission limits and fuel sulfur limit shall be demonstrated by District witnessed or authorized sample collection by independent laboratory. Test results shall be submitted within 60 days. [District NSR Rule and Rule 1081] Federally Enforceable Through Title V Permit
40. Operator shall be required to conform to the compliance testing procedures described in District Rule 1081. [District Rule 1081; Kern County Rule 108.1] Federally Enforceable Through Title V Permit
41. The following types of units are not affected units subject to the requirements of the Acid Rain Program: 1) A simple combustion turbine that commenced operation before November 15, 1990, 2) Any unit that, during 1985, did not serve a generator that produced electricity for sale and that did not, as of November 15, 1990, and does not currently, serve a generator that produces electricity for sale, 3) A cogeneration facility which for a unit that commenced construction prior to November 15, 1990, was constructed for the purpose of supplying equal to or less than one-third its potential electrical output capacity or equal to or less than 219,000 Mwe-hrs actual electric output on an annual basis to any utility power distribution system for sale. Therefore, the requirements of 40 CFR 72.6 do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rule 1081, 4201, 3.1; Rules 406 (Fresno), 407 (Kings, San Joaquin, Stanislaus, Tulare, Merced, and Kern), and 404(Madera); 40 CFR 60.332(c), (d); 60.334 (b), and (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

43. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4703, 6.2.2; Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern and Stanislaus), and 110 (Madera); Rules 402 (Madera) and 404 (Fresno, Kern, Kings, San Joaquin, Merced, Stanislaus, Tulare); 40 CFR 60.332 (a) and (b); 60.333(a) and (b); 60.334 (a), (b), and (c)(1); 60.335 (a), (b), (c), and (e). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. Compliance with the permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. Start-up shall be defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rule 4703, 3.29] Federally Enforceable Through Title V Permit
46. Shutdown shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4703, 3.26] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1129-54-12

EXPIRATION DATE: 02/29/2016

SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**EQUIPMENT DESCRIPTION:**

3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION NORTH MIDWAY UNIT #8

## PERMIT UNIT REQUIREMENTS

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1. Units shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(a) & (b); 60.332(a); Kern County Rule 407] Federally Enforceable Through Title V Permit
2. Gas turbine shall be fired exclusively with PUC-quality natural gas or equivalent with total sulfur content of less than or equal to 1.0 gr S/100 scf of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge, 0.1 gr/dscf. [District Rule 4201; Kern County Rule 404] Federally Enforceable Through Title V Permit
4. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or Double GC for H<sub>2</sub>S and Mercaptans. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
5. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.335(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
6. Nitrogen oxides (NO<sub>x</sub>) concentrations shall be determined using EPA Method 7E or 20, and oxygen (O<sub>2</sub>) concentrations shall be determined using EPA Method 3, 3A, or 20. [40 CFR 60.335(b) and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
7. The operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> concentration corrected to 15% O<sub>2</sub> (dry). [40 CFR 60.332(a), (b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
8. Carbon monoxide (CO) concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
9. If the turbine is fired on PUC-regulated natural gas, then the operator shall maintain a log describing the source of natural gas and the quantity used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, source(s) of and quantity of fuel used, fuel sulfur content and fuel nitrogen content. [40 CFR 60.332(a),(b); District Rules 2520, 9.3.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



12. Permittee shall install, operate and maintain in calibration a predictive emissions monitoring system which continuously measures and records the water-to-fuel ratio and which correlates the water-to-fuel ratio with the NOx concentration in the exhaust by using the method described in 40 CFR 60.335(c). [Rule 4703, 6.2.1 and 40 CFR 60.334] Federally Enforceable Through Title V Permit
13. Permittee shall submit to the APCO the information correlating the control system operating parameters to the associated measured NOx output. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
14. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
15. Permittee shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form to the APCO semiannually, except when more frequent reporting is specifically required by an applicable subpart. All reports shall be postmarked by the 30th day of each calendar half (or quarter, as appropriate). [40 CFR 60.7(c)] Federally Enforceable Through Title V Permit
16. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate NSPS NOx compliance shall be reported to the APCO. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit
17. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401, 5.0] Federally Enforceable Through Title V Permit
18. Cogeneration unit shall include 48.7 MMBtu/hr (nominal rating) Allison, model 501-KB-5, gas-fired turbine engine with pilotless fuel nozzles or conventional fuel nozzles, Ideal Synchronous electrical generator, Struthers-Wells unfired 22.5 MMBtu/hr steam generator and an inlet air evaporative cooler. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Turbine lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Generator gearbox lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Permittee shall notify the District by fax or in writing prior to or within 4 hours of any turbine nozzle replacement, except for identical replacement. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Gas turbine engine shall be equipped with continuously recording fuel gas flow rate monitor. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Gas turbine engine shall be equipped with operational water injection system for NOx control. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Gas turbine engine shall be equipped with continuously recording water injection rate monitor accurate to within 5%. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Gas turbine engine water injection rate shall be maintained at a water to fuel ratio no less than 0.48/1.0 by weight while operating with pilotless fuel nozzles and no less than 0.8/1.0 by weight while operating with conventional fuel nozzles. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Evaporative cooler shall use only fresh and filtered water. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Fiber bed filter system shall be maintained and operated in accordance with the manufacturer's plans and specifications. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

29. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Except during periods of startup/shutdown, emission rates (3 hr average) shall not exceed: PM10: 0.61 lb/hr; SOx (as SO2): 0.16 lb/hr; NOx: 42 ppmvd @ 15% O2; VOC: 1.65 lb/hr; and CO: 41 ppmvd @ 15% O2. [District Rules 2201 and 4703, 5.1] Federally Enforceable Through Title V Permit
31. Except during periods of startup/shutdown, NOx emission rate (3 hr average) shall not exceed 35 ppmvd NO2 @ 15% O2. [District Rule 4703, 5.2]
32. Emissions shall not exceed the following: PM10: 14.6 lb/day; SOx (as SO2): 3.3 lb/day; NOx (as NO2): 153.0 lb/day; VOC: 39.6 lb/day; and CO: 107.8 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
33. NOx and SOx emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O2, and 150 ppmv-dry @ 15% O2, respectively. [District Rule 2520, 9.3.2; 40 CFR 60.332(c); 40CFR 60.333(a)] Federally Enforceable Through Title V Permit
34. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption in gas turbine for normal operation and startup/shutdown periods. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Compliance testing of lube oil vent and gearbox vent shall be required if monthly visible emissions checks from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
36. Thermal stabilization period shall be defined as the start-up or shutdown time necessary to bring the heat recovery steam generator to proper temperature, not exceeding two hours. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Startup and shutdown of gas turbine engine shall not exceed a time period of two hours and two hours, respectively, per occurrence. [40 CFR Subpart A 60.2, District Rule 4703, and District NSR Rule] Federally Enforceable Through Title V Permit
38. Permittee shall keep accurate records of fuel sulfur content, and such records shall be made available for District inspection for five years. [40 CFR 60.334(b)(2), District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. Annual compliance with GTE NOx and CO emission limits and fuel sulfur limit shall be demonstrated by District witnessed or authorized sample collection by independent laboratory. Test results shall be submitted within 60 days. [District NSR Rule and Rule 1081] Federally Enforceable Through Title V Permit
40. Operator shall be required to conform to the compliance testing procedures described in District Rule 1081. [District Rule 1081; Kern County Rule 108.1] Federally Enforceable Through Title V Permit
41. The following types of units are not affected units subject to the requirements of the Acid Rain Program: 1) A simple combustion turbine that commenced operation before November 15, 1990, 2) Any unit that, during 1985, did not serve a generator that produced electricity for sale and that did not, as of November 15, 1990, and does not currently, serve a generator that produces electricity for sale, 3) A cogeneration facility which for a unit that commenced construction prior to November 15, 1990, was constructed for the purpose of supplying equal to or less than one-third its potential electrical output capacity or equal to or less than 219,000 Mwe-hrs actual electric output on an annual basis to any utility power distribution system for sale. Therefore, the requirements of 40 CFR 72.6 do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rule 1081, 4201, 3.1; Rules 406 (Fresno), 407 (Kings, San Joaquin, Stanislaus, Tulare, Merced, and Kern), and 404(Madera); 40 CFR 60.332(c), (d); 60.334 (b), and (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

43. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4703, 6.2.2; Rules 108 (Kings); 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern and Stanislaus), and 110 (Madera); Rules 402 (Madera) and 404 (Fresno, Kern, Kings, San Joaquin, Merced, Stanislaus, Tulare); 40 CFR 60.332 (a) and (b); 60.333(a) and (b); 60.334 (a), (b), and (c)(1); 60.335 (a), (b), (c), and (e). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. Compliance with the permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
45. Start-up shall be defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rule 4703, 3.29] Federally Enforceable Through Title V Permit
46. Shutdown shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4703, 3.26] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1129-55-11

EXPIRATION DATE: 02/29/2016

SECTION: 34 TOWNSHIP: 30S RANGE: 22E

## EQUIPMENT DESCRIPTION:

NON-COMPLIANT DORMANT 3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION NORTH MIDWAY UNIT #9

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010]
2. The fuel supply line shall be physically disconnected from this unit. [District Rule 4703]
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4703 and all other applicable District regulations. [District Rule 4703]
4. Units shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(a) & (b); 60.332(a); Kern County Rule 407] Federally Enforceable Through Title V Permit
5. Gas turbine shall be fired exclusively with PUC-quality natural gas or equivalent with total sulfur content of less than or equal to 1.0 gr S/100 scf of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge, 0.1 gr/dscf. [District Rule 4201; Kern County Rule 404] Federally Enforceable Through Title V Permit
7. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or Double GC for H<sub>2</sub>S and Mercaptans. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
8. HHV and LHV of the fuel shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.335(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
9. Nitrogen oxides (NO<sub>x</sub>) concentrations shall be determined using EPA Method 7E or 20, and oxygen (O<sub>2</sub>) concentrations shall be determined using EPA Method 3, 3A, or 20. [40 CFR 60.335(b) and District Rule 4703, 6.4] Federally Enforceable Through Title V Permit
10. The operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> concentration corrected to 15% O<sub>2</sub> (dry). [40 CFR 60.332(a), (b) and District Rule 4703, 5.1] Federally Enforceable Through Title V Permit
11. Carbon monoxide (CO) concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703] Federally Enforceable Through Title V Permit
12. If the turbine is fired on PUC-regulated natural gas, then the operator shall maintain a log describing the source of natural gas and the quantity used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. The operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, source(s) of and quantity of fuel used, fuel sulfur content and fuel nitrogen content. [40 CFR 60.332(a),(b); District Rules 2520, 9.3.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
15. Permittee shall install, operate and maintain in calibration a predictive emissions monitoring system which continuously measures and records the water-to-fuel ratio and which correlates the water-to-fuel ratio with the NOx concentration in the exhaust by using the method described in 40 CFR 60.335(c). [Rule 4703 and 40 CFR 60.334] Federally Enforceable Through Title V Permit
16. Permittee shall submit to the APCO the information correlating the control system operating parameters to the associated measured NOx output. [District Rule 4703, 6.2.5] Federally Enforceable Through Title V Permit
17. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
18. Permittee shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form to the APCO semiannually, except when more frequent reporting is specifically required by an applicable subpart. All reports shall be postmarked by the 30th day of each calendar half (or quarter, as appropriate). [40 CFR 60.7(c)] Federally Enforceable Through Title V Permit
19. Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate NSPS NOx compliance shall be reported to the APCO. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit
20. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401, 5.0] Federally Enforceable Through Title V Permit
21. Cogeneration unit shall include 48.7 MMBtu/hr (nominal rating) Allison, model 501-KB-5, gas-fired turbine engine with pilotless fuel nozzles or conventional fuel nozzles, Ideal Synchronous electrical generator, Struthers-Wells unfired 22.5 MMBtu/hr steam generator and an inlet air evaporative cooler. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Turbine lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Generator gearbox lube oil tank shall vent only through CECO Model #STTOR-10 fiber bed filter system. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Permittee shall notify the District by fax or in writing prior to or within 4 hours of any turbine nozzle replacement, except for identical replacement. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Gas turbine engine shall be equipped with continuously recording fuel gas flow rate monitor. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Gas turbine engine shall be equipped with operational water injection system for NOx control. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Gas turbine engine shall be equipped with continuously recording water injection rate monitor accurate to within 5%. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Gas turbine engine water injection rate shall be maintained at a water to fuel ratio no less than 0.48/1.0 by weight while operating with pilotless fuel nozzles and no less than 0.8/1.0 by weight while operating with conventional fuel nozzles. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

30. Evaporative cooler shall use only fresh and filtered water. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Fiber bed filter system shall be maintained and operated in accordance with the manufacturer's plans and specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
33. Except during periods of startup/shutdown, emission rates (3 hr average) shall not exceed: PM10: 0.61 lb/hr; SO<sub>x</sub> (as SO<sub>2</sub>): 0.16 lb/hr; NO<sub>x</sub>: 42 ppmvd @ 15% O<sub>2</sub>; VOC: 1.65 lb/hr; and CO: 41 ppmvd @ 15% O<sub>2</sub>. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
34. Except during periods of startup/shutdown, NO<sub>x</sub> emission rate (3 hr average) shall not exceed 35 ppmvd NO<sub>2</sub> @ 15% O<sub>2</sub>. [District Rule 4703]
35. Emissions shall not exceed the following: PM10: 14.6 lb/day; SO<sub>x</sub> (as SO<sub>2</sub>): 3.3 lb/day; NO<sub>x</sub> (as NO<sub>2</sub>): 153.0 lb/day; VOC: 39.6 lb/day; and CO: 107.8 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
36. NO<sub>x</sub> and SO<sub>x</sub> emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O<sub>2</sub>, and 150 ppmv-dry @ 15% O<sub>2</sub>, respectively. [District Rule 2520, 9.3.2; 40 CFR 60.332(c); 40CFR 60.333(a)] Federally Enforceable Through Title V Permit
37. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption in gas turbine for normal operation and startup/shutdown periods. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Compliance testing of lube oil vent and gearbox vent shall be required if monthly visible emissions checks from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rules 2520, 9.3.2 and NSR] Federally Enforceable Through Title V Permit
39. Thermal stabilization period shall be defined as the start-up or shutdown time necessary to bring the heat recovery steam generator to proper temperature, not exceeding two hours. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Startup and shutdown of gas turbine engine, as defined in 40 CFR Subpart A 60.2, shall not exceed a time period of two hours and two hours, respectively, per occurrence. [40 CFR Subpart A 60.2, District NSR Rule] Federally Enforceable Through Title V Permit
41. Permittee shall keep accurate records of fuel sulfur content, and such records shall be made available for District inspection for five years. [40 CFR 60.334(b)(2), District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
42. Annual compliance with GTE NO<sub>x</sub> and CO emission limits (pursuant to Rule 4703 (10/16/97)) and fuel sulfur limit shall be demonstrated by District witnessed or authorized sample collection by independent laboratory. Test results shall be submitted within 60 days. [District NSR Rule and Rule 4703] Federally Enforceable Through Title V Permit
43. Operator shall be required to conform to the compliance testing procedures described in District Rule 1081. [District Rule 1081; Kern County Rule 108.1] Federally Enforceable Through Title V Permit
44. The following types of units are not affected units subject to the requirements of the Acid Rain Program: 1) A simple combustion turbine that commenced operation before November 15, 1990, 2) Any unit that, during 1985, did not serve a generator that produced electricity for sale and that did not, as of November 15, 1990, and does not currently, serve a generator that produces electricity for sale, 3) A cogeneration facility which for a unit that commenced construction prior to November 15, 1990, was constructed for the purpose of supplying equal to or less than one-third its potential electrical output capacity or equal to or less than 219,000 Mwe-hrs actual electric output on an annual basis to any utility power distribution system for sale. Therefore, the requirements of 40 CFR 72.6 do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520; 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

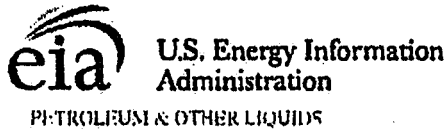
45. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rule 1081, 4201, 3.1; Rules 406 (Fresno), 407 (Kings, San Joaquin, Stanislaus, Tulare, Merced, and Kern), and 404(Madera); 40 CFR 60.332(c), (d); 60.334 (b), and (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4703, 6.2.2; Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern and Stanislaus), and 110 (Madera); Rules 402 (Madera) and 404 (Fresno, Kern, Kings, San Joaquin, Merced, Stanislaus, Tulare); 40 CFR 60.332 (a) and (b); 60.333(a) and (b); 60.334 (a), (b), and (c)(1); 60.335 (a), (b), (c), and (e). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. Compliance with the permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

## **Appendix C**

### **Graph of California Field Production of Crude Oil**



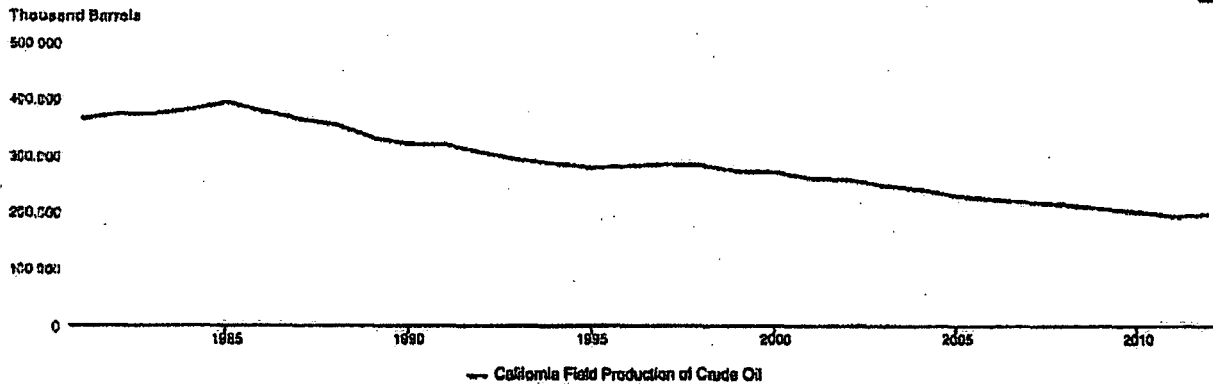


OVERVIEW **DATA** ANALYSIS & PROJECTIONS GLOSSARY FAQs

View History:  Monthly  Annual

[Download Data \(XLS File\)](#)

**California Field Production of Crude Oil**



Source: U.S. Energy Information Administration

Decade	Year-0	Year-1	Year-2	Year-3	Year-4	Year-5	Year-6	Year-7	Year-8	Year-9
1980's		365,170	371,176	374,161	381,621	394,182	378,059	364,608	354,730	331,174
1990's	320,868	319,197	305,488	293,090	286,060	278,977	282,409	285,172	283,627	273,017
2000's	271,132	260,663	257,898	248,170	240,306	229,350	223,449	218,525	214,544	207,094
2010's	201,385	193,691	196,334							

- = No Data Reported; - = Not Applicable; NA = Not Available; W = Withheld to avoid disclosure of individual company data.

Release Date: 3/15/2013  
Next Release Date: 02/27/2013

Refering Pages:  
■ Crude Oil Production

## **Appendix D**

### **North Midway GTE Fuel Usage during Baseline Period**

# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
10/1/2008	7	0	0	
10/2/2008	7	547.7	497	
10/3/2008	7	1,110.80	1,008.00	
10/4/2008	7	1,113.60	1,010.60	
10/5/2008	7	1,111.30	1,008.50	
10/6/2008	7	1,119.10	1,015.50	
10/7/2008	7	1,119.10	1,015.50	
10/8/2008	7	1,117.10	1,013.70	
10/9/2008	7	1,124.20	1,020.10	
10/10/2008	7	1,116.50	1,013.10	
10/11/2008	7	1,126.90	1,022.60	
10/12/2008	7	1,126.40	1,022.10	
10/13/2008	7	1,095.40	994	
10/14/2008	7	1,104.80	1,002.50	
10/15/2008	7	1,101.00	999.1	
10/16/2008	7	1,101.00	999.1	
10/17/2008	7	1,101.00	999.1	
10/18/2008	7	1,099.60	997.9	
10/19/2008	7	1,101.90	999.9	
10/20/2008	7	1,102.20	1,000.20	
10/21/2008	7	1,103.80	1,001.60	
10/22/2008	7	1,100.90	999	
10/23/2008	7	1,039.60	943.4	
10/24/2008	7	980	889.3	
10/25/2008	7	1,120.10	1,016.50	
10/26/2008	7	1,126.90	1,022.60	
10/27/2008	7	1,130.90	1,026.30	
10/28/2008	7	1,128.70	1,024.20	
10/29/2008	7	1,126.40	1,022.10	
10/30/2008	7	1,126.00	1,021.80	
10/31/2008	7	1,127.60	1,023.20	
11/1/2008	7	1,128.20	1,023.80	
11/2/2008	7	1,155.00	1,048.10	
11/3/2008	7	1,053.00	955.6	
11/4/2008	7	1,099.00	997.2	
11/5/2008	7	1,109.00	1,006.40	
11/6/2008	7	1,116.50	1,013.20	
11/7/2008	7	1,116.90	1,013.50	
11/8/2008	7	1,121.10	1,017.30	
11/9/2008	7	1,117.80	1,014.40	
11/10/2008	7	1,121.80	1,018.00	
11/11/2008	7	1,120.80	1,017.10	
11/12/2008	7	1,123.30	1,019.30	
11/13/2008	7	1,120.90	1,017.20	
11/14/2008	7	1,119.90	1,016.30	
11/15/2008	7	1,122.20	1,018.30	
11/16/2008	7	1,122.40	1,018.50	
11/17/2008	7	1,130.60	1,025.90	
11/18/2008	7	1,130.90	1,026.20	
11/19/2008	7	1,131.40	1,026.70	
11/20/2008	7	1,131.30	1,026.60	
11/21/2008	7	1,128.30	1,023.80	
11/22/2008	7	1,128.10	1,023.70	
11/23/2008	7	1,129.70	1,025.10	
11/24/2008	7	1,131.50	1,026.80	
11/25/2008	7	1,132.00	1,027.20	
11/26/2008	7	1,132.60	1,027.70	
11/27/2008	7	1,127.00	1,022.60	
11/28/2008	7	1,128.70	1,024.20	
11/29/2008	7	1,128.30	1,023.90	
11/30/2008	7	1,133.40	1,028.50	
12/1/2008	7	1,123.40	1,019.40	
12/2/2008	7	1,122.40	1,018.50	
12/3/2008	7	1,128.20	1,023.70	
12/4/2008	7	1,128.70	1,024.20	
12/5/2008	7	1,131.00	1,026.30	
12/6/2008	7	1,133.00	1,028.10	

# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
12/7/2008	7	1,133.00	1,028.10	
12/8/2008	7	1,131.90	1,027.10	
12/9/2008	7	1,132.10	1,027.40	
12/10/2008	7	1,134.10	1,029.10	
12/11/2008	7	1,133.10	1,028.20	
12/12/2008	7	1,130.30	1,025.70	
12/13/2008	7	1,130.80	1,026.00	
12/14/2008	7	1,131.20	1,026.50	
12/15/2008	7	1,133.70	1,028.70	
12/16/2008	7	1,132.70	1,027.80	
12/17/2008	7	1,127.30	1,023.00	
12/18/2008	7	1,128.70	1,024.30	
12/19/2008	7	1,131.80	1,027.10	
12/20/2008	7	1,128.80	1,024.40	
12/21/2008	7	1,131.40	1,026.70	
12/22/2008	7	1,129.30	1,024.80	
12/23/2008	7	1,132.20	1,027.40	
12/24/2008	7	1,131.90	1,027.10	
12/25/2008	7	1,128.90	1,024.40	
12/26/2008	7	1,130.40	1,025.80	
12/27/2008	7	1,132.30	1,027.40	
12/28/2008	7	1,133.40	1,028.50	
12/29/2008	7	1,133.40	1,028.50	
12/30/2008	7	1,118.70	1,015.10	
12/31/2008	7	1,114.70	1,011.50	101364.7
1/1/2009	7	1,115.80	1,012.40	
1/2/2009	7	1,090.80	989.7	
1/3/2009	7	1,131.70	1,026.90	
1/4/2009	7	1,129.20	1,024.70	
1/5/2009	7	1,094.70	993.4	
1/6/2009	7	1,082.60	982.4	
1/7/2009	7	1,083.80	983.5	
1/8/2009	7	1,075.70	976.1	
1/9/2009	7	525.3	476.7	
1/10/2009	7	0	0	
1/11/2009	7	0	0	
1/12/2009	7	0	0	
1/13/2009	7	0	0	
1/14/2009	7	0	0	
1/15/2009	7	0	0	
1/16/2009	7	33.8	30.7	
1/17/2009	7	0	0	
1/18/2009	7	0	0	
1/19/2009	7	0	0	
1/20/2009	7	0	0	
1/21/2009	7	518.4	470.4	
1/22/2009	7	1,053.70	956.2	
1/23/2009	7	1,116.50	1,013.10	
1/24/2009	7	1,117.70	1,014.30	
1/25/2009	7	740.9	672.4	
1/26/2009	7	0	0	
1/27/2009	7	0	0	
1/28/2009	7	900.9	817.5	
1/29/2009	7	1,122.70	1,018.80	
1/30/2009	7	1,128.70	1,024.20	
1/31/2009	7	1,135.30	1,030.20	
2/1/2009	7	1,140.10	1,034.60	
2/2/2009	7	1,136.50	1,031.30	
2/3/2009	7	1,138.80	1,033.30	
2/4/2009	7	1,141.00	1,035.40	
2/5/2009	7	1,104.30	1,002.10	
2/6/2009	7	1,081.70	981.6	
2/7/2009	7	1,079.10	979.2	
2/8/2009	7	1,080.80	980.8	
2/9/2009	7	1,083.40	983.1	
2/10/2009	7	1,082.40	982.2	
2/11/2009	7	1,085.70	985.2	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
2/12/2009	7	1,083.80	983.5	
2/13/2009	7	1,085.30	984.8	
2/14/2009	7	1,093.20	992	
2/15/2009	7	1,112.40	1,009.40	
2/16/2009	7	1,115.70	1,012.40	
2/17/2009	7	1,119.50	1,015.80	
2/18/2009	7	1,123.20	1,019.30	
2/19/2009	7	1,119.90	1,016.30	
2/20/2009	7	1,108.80	1,004.40	
2/21/2009	7	1,103.50	1,001.30	
2/22/2009	7	1,111.60	1,008.80	
2/23/2009	7	1,112.00	992.1	
2/24/2009	7	1,110.00	970.5	
2/25/2009	7	1,110.60	971.4	
2/26/2009	7	1,112.20	972.6	
2/27/2009	7	1,113.00	972.7	
2/28/2009	7	1,114.40	975.1	
3/1/2009	7	1,117.80	976.2	
3/2/2009	7	1,080.00	977.2	
3/3/2009	7	1,079.90	977.2	
3/4/2009	7	1,078.40	975.8	
3/5/2009	7	1,077.60	975	
3/6/2009	7	1,077.10	974.6	
3/7/2009	7	1,074.80	972.6	
3/8/2009	7	1,075.60	973.3	
3/9/2009	7	1,035.00	936.5	
3/10/2009	7	1,081.40	978.5	
3/11/2009	7	1,082.10	979.1	
3/12/2009	7	1,078.80	976.2	
3/13/2009	7	1,080.70	977.9	
3/14/2009	7	1,078.60	975.9	
3/15/2009	7	1,077.00	974.5	
3/16/2009	7	1,078.60	975.9	
3/17/2009	7	1,080.20	977.3	
3/18/2009	7	1,079.70	976.9	
3/19/2009	7	1,076.80	974.3	
3/20/2009	7	1,074.50	972.3	
3/21/2009	7	1,076.00	973.6	
3/22/2009	7	1,078.20	975.6	
3/23/2009	7	1,079.40	976.6	
3/24/2009	7	1,059.50	958.7	
3/25/2009	7	1,058.40	957.7	
3/26/2009	7	1,061.00	960	
3/27/2009	7	1,060.20	959.4	
3/28/2009	7	1,059.20	958.4	
3/29/2009	7	1,058.10	957.4	
3/30/2009	7	1,057.50	956.8	
3/31/2009	7	1,058.80	958.1	82,469.60
4/1/2009	7	1,058.40	957.7	
4/2/2009	7	1,054.50	954.2	
4/3/2009	7	1,051.30	951.2	
4/4/2009	7	1,049.70	949.9	
4/5/2009	7	1,052.10	952	
4/6/2009	7	1,056.10	955.6	
4/7/2009	7	1,068.80	967.1	
4/8/2009	7	213.6	193.3	
4/9/2009	7	410.5	371.4	
4/10/2009	7	1,080.40	977.6	
4/11/2009	7	1,073.20	971	
4/12/2009	7	1,078.60	976	
4/13/2009	7	525.3	475.3	
4/14/2009	7	0	0	
4/15/2009	7	0	0	
4/16/2009	7	0	0	
4/17/2009	7	0	0	
4/18/2009	7	0	0	
4/19/2009	7	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
4/20/2009	7	0	0	
4/21/2009	7	0	0	
4/22/2009	7	0	0	
4/23/2009	7	0	0	
4/24/2009	7	0	0	
4/25/2009	7	0	0	
4/26/2009	7	0	0	
4/27/2009	7	0	0	
4/28/2009	7	0	0	
4/29/2009	7	0	0	
4/30/2009	7	0	0	
5/1/2009	7	0	0	
5/2/2009	7	0	0	
5/3/2009	7	0	0	
5/4/2009	7	0	0	
5/5/2009	7	0	0	
5/6/2009	7	648.6	586.9	
5/7/2009	7	1,070.70	968.8	
5/8/2009	7	1,065.30	963.9	
5/9/2009	7	1,066.60	965.3	
5/10/2009	7	1,066.20	964.7	
5/11/2009	7	1,068.50	966.8	
5/12/2009	7	1,066.00	964.6	
5/13/2009	7	1,069.10	967.4	
5/14/2009	7	615.3	556.6	
5/15/2009	7	1,046.50	948.7	
5/16/2009	7	1,044.60	945.2	
5/17/2009	7	1,045.30	945.8	
5/18/2009	7	1,048.70	948.9	
5/19/2009	7	1,032.30	934	
5/20/2009	7	990.9	896.6	
5/21/2009	7	982.2	868.7	
5/22/2009	7	983.1	869.5	
5/23/2009	7	985.4	891.6	
5/24/2009	7	991.8	897.4	
5/25/2009	7	992.6	896.2	
5/26/2009	7	992.9	898.4	
5/27/2009	7	991.7	897.4	
5/28/2009	7	730.8	661.3	
5/29/2009	7	0	0	
5/30/2009	7	0	0	
5/31/2009	7	0	0	
6/1/2009	7	0	0	
6/2/2009	7	0	0	
6/3/2009	7	0	0	
6/4/2009	7	0	0	
6/5/2009	7	0	0	
6/6/2009	7	0	0	
6/7/2009	7	0	0	
6/8/2009	7	0	0	
6/9/2009	7	0	0	
6/10/2009	7	0	0	
6/11/2009	7	0	0	
6/12/2009	7	0	0	
6/13/2009	7	0	0	
6/14/2009	7	0	0	
6/15/2009	7	0	0	
6/16/2009	7	0	0	
6/17/2009	7	0	0	
6/18/2009	7	0	0	
6/19/2009	7	0	0	
6/20/2009	7	0	0	
6/21/2009	7	0	0	
6/22/2009	7	0	0	
6/23/2009	7	380.9	344.7	
6/24/2009	7	1,032.70	934.4	
6/25/2009	7	1,036.60	936.1	

# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
4/20/2009	7	0	0	
4/21/2009	7	0	0	
4/22/2009	7	0	0	
4/23/2009	7	0	0	
4/24/2009	7	0	0	
4/25/2009	7	0	0	
4/26/2009	7	0	0	
4/27/2009	7	0	0	
4/28/2009	7	0	0	
4/29/2009	7	0	0	
4/30/2009	7	0	0	
5/1/2009	7	0	0	
5/2/2009	7	0	0	
5/3/2009	7	0	0	
5/4/2009	7	0	0	
5/5/2009	7	0	0	
5/6/2009	7	648.6	586.9	
5/7/2009	7	1,070.70	968.8	
5/8/2009	7	1,065.30	963.9	
5/9/2009	7	1,066.80	965.3	
5/10/2009	7	1,066.20	964.7	
5/11/2009	7	1,068.50	966.8	
5/12/2009	7	1,066.00	964.6	
5/13/2009	7	1,069.10	967.4	
5/14/2009	7	615.3	556.8	
5/15/2009	7	1,048.50	948.7	
5/16/2009	7	1,044.60	945.2	
5/17/2009	7	1,045.30	945.8	
5/18/2009	7	1,048.70	948.9	
5/19/2009	7	1,032.30	934	
5/20/2009	7	990.9	896.6	
5/21/2009	7	982.2	888.7	
5/22/2009	7	983.1	889.5	
5/23/2009	7	985.4	891.6	
5/24/2009	7	991.8	897.4	
5/25/2009	7	992.6	898.2	
5/26/2009	7	992.9	898.4	
5/27/2009	7	991.7	897.4	
5/28/2009	7	730.8	661.3	
5/29/2009	7	0	0	
5/30/2009	7	0	0	
5/31/2009	7	0	0	
6/1/2009	7	0	0	
6/2/2009	7	0	0	
6/3/2009	7	0	0	
6/4/2009	7	0	0	
6/5/2009	7	0	0	
6/6/2009	7	0	0	
6/7/2009	7	0	0	
6/8/2009	7	0	0	
6/9/2009	7	0	0	
6/10/2009	7	0	0	
6/11/2009	7	0	0	
6/12/2009	7	0	0	
6/13/2009	7	0	0	
6/14/2009	7	0	0	
6/15/2009	7	0	0	
6/16/2009	7	0	0	
6/17/2009	7	0	0	
6/18/2009	7	0	0	
6/19/2009	7	0	0	
6/20/2009	7	0	0	
6/21/2009	7	0	0	
6/22/2009	7	0	0	
6/23/2009	7	380.9	344.7	
6/24/2009	7	1,032.70	934.4	
6/25/2009	7	1,036.80	938.1	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
6/26/2009	7	1,028.80	930.9	
6/27/2009	7	1,031.10	933	
6/28/2009	7	1,032.30	934.1	
6/29/2009	7	1,040.40	941.4	
6/30/2009	7	1,040.30	941.3	41,993.10
7/1/2009	7	676.4	612.1	
7/2/2009	7	394.4	358.9	
7/3/2009	7	1,060.40	959.5	
7/4/2009	7	1,063.30	962.1	
7/5/2009	7	1,062.00	961	
7/6/2009	7	1,057.40	956.8	
7/7/2009	7	1,061.90	960.8	
7/8/2009	7	1,051.90	951.8	
7/9/2009	7	1,053.40	953.2	
7/10/2009	7	1,052.70	952.5	
7/11/2009	7	1,053.70	953.4	
7/12/2009	7	1,098.20	993.7	
7/13/2009	7	915	827.9	
7/14/2009	7	1,047.20	947.5	
7/15/2009	7	1,046.50	946.9	
7/16/2009	7	1,049.30	949.4	
7/17/2009	7	1,047.20	947.5	
7/18/2009	7	1,037.00	938.3	
7/19/2009	7	1,023.00	925.7	
7/20/2009	7	1,026.90	929.2	
7/21/2009	7	1,022.30	925	
7/22/2009	7	1,020.50	923.4	
7/23/2009	7	1,023.00	925.7	
7/24/2009	7	1,017.20	920.4	
7/25/2009	7	1,019.90	922.9	
7/26/2009	7	1,019.30	922.3	
7/27/2009	7	1,021.10	924	
7/28/2009	7	1,023.10	925.7	
7/29/2009	7	1,025.50	927.9	
7/30/2009	7	926.3	838.1	
7/31/2009	7	1,025.00	927.5	
8/1/2009	7	1,044.20	944.8	
8/2/2009	7	1,050.40	950.4	
8/3/2009	7	1,072.30	970.2	
8/4/2009	7	1,063.90	960.7	
8/5/2009	7	1,078.30	975.7	
8/6/2009	7	1,076.80	974.3	
8/7/2009	7	1,077.60	975.1	
8/8/2009	7	1,080.20	977.4	
8/9/2009	7	1,084.60	981.4	
8/10/2009	7	1,014.70	918.2	
8/11/2009	7	1,045.20	945.8	
8/12/2009	7	1,050.70	950.7	
8/13/2009	7	1,049.70	949.8	
8/14/2009	7	1,046.90	947.3	
8/15/2009	7	1,044.80	945.4	
8/16/2009	7	1,043.60	944.3	
8/17/2009	7	1,045.60	946.1	
8/18/2009	7	1,045.90	946.4	
8/19/2009	7	1,050.40	950.5	
8/20/2009	7	1,047.60	948	
8/21/2009	7	1,047.80	948.1	
8/22/2009	7	1,040.50	941.5	
8/23/2009	7	1,037.90	939.2	
8/24/2009	7	1,036.20	937.6	
8/25/2009	7	1,039.80	940.9	
8/26/2009	7	1,039.40	940.5	
8/27/2009	7	1,044.80	945.4	
8/28/2009	7	1,044.00	944.7	
8/29/2009	7	1,044.20	944.8	
8/30/2009	7	1,046.90	947.3	
8/31/2009	7	1,050.10	950.1	



# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
9/1/2009	7	526.6	476.5	
9/2/2009	7	0	0	
9/3/2009	7	470.8	426	
9/4/2009	7	1,026.30	928.6	
9/5/2009	7	1,022.90	925.5	
9/6/2009	7	1,023.80	926.4	
9/7/2009	7	1,023.30	925.9	
9/8/2009	7	1,057.80	957.2	
9/9/2009	7	1,084.90	981.7	
9/10/2009	7	1,086.30	982.9	
9/11/2009	7	1,086.70	983.3	
9/12/2009	7	1,090.60	986.8	
9/13/2009	7	1,082.70	979.7	
9/14/2009	7	1,075.80	973.5	
9/15/2009	7	1,070.00	968.2	
9/16/2009	7	1,067.10	965.5	
9/17/2009	7	1,069.30	967.6	
9/18/2009	7	1,075.60	973.3	
9/19/2009	7	1,074.10	971.9	
9/20/2009	7	1,073.20	971.1	
9/21/2009	7	1,068.70	967	
9/22/2009	7	1,070.00	968.2	
9/23/2009	7	1,067.90	966.2	
9/24/2009	7	1,066.60	965.1	
9/25/2009	7	1,068.60	967	
9/26/2009	7	1,070.80	968.9	
9/27/2009	7	1,065.40	964	
9/28/2009	7	1,066.40	965	
9/29/2009	7	1,065.60	964.4	
9/30/2009	7	1,060.20	959.3	93,384.20
10/1/2009	7	1,111.70	1,006.00	
10/2/2009	7	995.2	900.5	
10/3/2009	7	818.4	740.5	
10/4/2009	7	860	778.2	
10/5/2009	7	958.5	867.3	
10/6/2009	7	1,062.90	961.8	
10/7/2009	7	1,071.10	969.2	
10/8/2009	7	1,072.60	970.5	
10/9/2009	7	1,072.30	970.2	
10/10/2009	7	1,069.90	968.1	
10/11/2009	7	1,069.50	967.7	
10/12/2009	7	1,079.70	976.9	
10/13/2009	7	872	789	
10/14/2009	7	1,067.20	965.6	
10/15/2009	7	169.2	153.1	
10/16/2009	7	0	0	
10/17/2009	7	0	0	
10/18/2009	7	0	0	
10/19/2009	7	624.8	565.3	
10/20/2009	7	1,086.80	983.4	
10/21/2009	7	1,088.80	983.3	
10/22/2009	7	1,096.90	985.4	
10/23/2009	7	1,093.30	982.2	
10/24/2009	7	1,104.40	992.2	
10/25/2009	7	1,100.70	988.8	
10/26/2009	7	1,100.50	988.6	
10/27/2009	7	1,093.90	982.7	
10/28/2009	7	1,069.00	960.4	
10/29/2009	7	1,083.10	973	
10/30/2009	7	1,094.00	982.8	
10/31/2009	7	1,093.70	982.6	
11/1/2009	7	1,058.00	950.4	
11/2/2009	7	1,014.00	910.9	
11/3/2009	7	1,000.60	898.9	
11/4/2009	7	1,065.60	957.2	
11/5/2009	7	1,067.00	958.6	
11/6/2009	7	782.1	702.6	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
11/7/2009	7	0	0	
11/8/2009	7	0	0	
11/9/2009	7	0	0	
11/10/2009	7	0	0	
11/11/2009	7	0	0	
11/12/2009	7	0	0	
11/13/2009	7	0	0	
11/14/2009	7	0	0	
11/15/2009	7	0	0	
11/16/2009	7	0	0	
11/17/2009	7	0	0	
11/18/2009	7	0	0	
11/19/2009	7	0	0	
11/20/2009	7	0	0	
11/21/2009	7	0	0	
11/22/2009	7	0	0	
11/23/2009	7	0	0	
11/24/2009	7	0	0	
11/25/2009	7	0	0	
11/26/2009	7	0	0	
11/27/2009	7	0	0	
11/28/2009	7	0	0	
11/29/2009	7	0	0	
11/30/2009	7	0	0	
12/1/2009	7	0	0	
12/2/2009	7	0	0	
12/3/2009	7	0	0	
12/4/2009	7	0	0	
12/5/2009	7	0	0	
12/6/2009	7	0	0	
12/7/2009	7	0	0	
12/8/2009	7	0	0	
12/9/2009	7	0	0	
12/10/2009	7	0	0	
12/11/2009	7	0	0	
12/12/2009	7	0	0	
12/13/2009	7	0	0	
12/14/2009	7	0	0	
12/15/2009	7	0	0	
12/16/2009	7	0	0	
12/17/2009	7	0	0	
12/18/2009	7	0	0	
12/19/2009	7	0	0	
12/20/2009	7	0	0	
12/21/2009	7	0	0	
12/22/2009	7	0	0	
12/23/2009	7	0	0	
12/24/2009	7	0	0	
12/25/2009	7	0	0	
12/26/2009	7	0	0	
12/27/2009	7	0	0	
12/28/2009	7	0	0	
12/29/2009	7	0	0	
12/30/2009	7	0	0	
12/31/2009	7	0	0	34,067.40
1/1/2010	7	0	0	
1/2/2010	7	0	0	
1/3/2010	7	0	0	
1/4/2010	7	0	0	
1/5/2010	7	0	0	
1/6/2010	7	0	0	
1/7/2010	7	0	0	
1/8/2010	7	0	0	
1/9/2010	7	0	0	
1/10/2010	7	0	0	
1/11/2010	7	0	0	
1/12/2010	7	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
1/13/2010	7	0	0	
1/14/2010	7	0	0	
1/15/2010	7	0	0	
1/16/2010	7	0	0	
1/17/2010	7	0	0	
1/18/2010	7	0	0	
1/19/2010	7	0	0	
1/20/2010	7	0	0	
1/21/2010	7	0	0	
1/22/2010	7	0	0	
1/23/2010	7	0	0	
1/24/2010	7	0	0	
1/25/2010	7	0	0	
1/26/2010	7	0	0	
1/27/2010	7	0	0	
1/28/2010	7	0	0	
1/29/2010	7	0	0	
1/30/2010	7	0	0	
1/31/2010	7	0	0	
2/1/2010	7	0	0	
2/2/2010	7	0	0	
2/3/2010	7	0	0	
2/4/2010	7	0	0	
2/5/2010	7	0	0	
2/6/2010	7	0	0	
2/7/2010	7	0	0	
2/8/2010	7	0	0	
2/9/2010	7	0	0	
2/10/2010	7	0	0	
2/11/2010	7	0	0	
2/12/2010	7	16.5	14.7	
2/13/2010	7	0	0	
2/14/2010	7	0	0	
2/15/2010	7	13.8	12.3	
2/16/2010	7	511.6	454.4	
2/17/2010	7	936.7	632	
2/18/2010	7	963.5	855.7	
2/19/2010	7	1,075.50	955.2	
2/20/2010	7	1,068.60	949.1	
2/21/2010	7	1,065.10	946	
2/22/2010	7	1,063.80	944.8	
2/23/2010	7	1,068.50	949.9	
2/24/2010	7	1,078.60	958	
2/25/2010	7	1,078.00	957.4	
2/26/2010	7	1,079.70	959	
2/27/2010	7	1,074.40	954.3	
2/28/2010	7	91.7	81.4	
3/1/2010	7			
3/2/2010	7	0	0	
3/3/2010	7	0	0	
3/4/2010	7	0	0	
3/5/2010	7	0	0	
3/6/2010	7	0	0	
3/7/2010	7	0	0	
3/8/2010	7	0	0	
3/9/2010	7	0	0	
3/10/2010	7	0	0	
3/11/2010	7	0	0	
3/12/2010	7	0	0	
3/13/2010	7	0	0	
3/14/2010	7	0	0	
3/15/2010	7	0	0	
3/16/2010	7	0.2	0.2	
3/17/2010	7	9.6	8.5	
3/18/2010	7	0	0	
3/19/2010	7	0	0	
3/20/2010	7	0	0	

# MDW34Z COGEN FUEL USAGE ALL UNITS

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
3/21/2010	7	0	0	
3/22/2010	7	632.7	562	
3/23/2010	7	1,072.40	952.5	
3/24/2010	7	1,079.80	959	
3/25/2010	7	1,077.60	957.1	
3/26/2010	7	1,076.60	956.4	
3/27/2010	7	1,069.10	949.6	
3/28/2010	7	1,071.70	951.9	
3/29/2010	7	1,074.20	954.1	
3/30/2010	7	1,071.50	951.7	
3/31/2010	7	1,070.50	950.8	22,493.10
4/1/2010	7	1,071.40	951.6	
4/2/2010	7	1,070.80	951.1	
4/3/2010	7	1,072.00	952.1	
4/4/2010	7	1,071.20	951.4	
4/5/2010	7	367.1	326.1	
4/6/2010	7	0	0	
4/7/2010	7	0	0	
4/8/2010	7	0	0	
4/9/2010	7	588	522.2	
4/10/2010	7	1,079.60	958.9	
4/11/2010	7	1,063.60	944.7	
4/12/2010	7	1,068.50	949.1	
4/13/2010	7	1,065.30	946.2	
4/14/2010	7	1,070.80	951	
4/15/2010	7	1,078.90	958.3	
4/16/2010	7	1,085.00	963.6	
4/17/2010	7	1,086.50	965	
4/18/2010	7	1,082.90	961.8	
4/19/2010	7	1,084.70	963.4	
4/20/2010	7	1,082.50	961.5	
4/21/2010	7	1,078.40	957.6	
4/22/2010	7	1,078.10	957.5	
4/23/2010	7	1,077.50	957	
4/24/2010	7	1,088.70	967	
4/25/2010	7	1,085.50	964.1	
4/26/2010	7	1,089.50	967.7	
4/27/2010	7	1,089.10	967.3	
4/28/2010	7	1,085.30	964	
4/29/2010	7	1,057.40	939.2	
4/30/2010	7	997.5	886	
5/1/2010	7	993.6	882.5	
5/2/2010	7	996.4	885	
5/3/2010	7	997.6	886.1	
5/4/2010	7	999	887.3	
5/5/2010	7	706.9	627.9	
5/6/2010	7	0	0	
5/7/2010	7	0	0	
5/8/2010	7	0	0	
5/9/2010	7	0	0	
5/10/2010	7	0	0	
5/11/2010	7	0	0	
5/12/2010	7	0	0	
5/13/2010	7	0	0	
5/14/2010	7	0	0	
5/15/2010	7	0	0	
5/16/2010	7	0	0	
5/17/2010	7	0	0	
5/18/2010	7	0	0	
5/19/2010	7	0	0	
5/20/2010	7	262.1	232.8	
5/21/2010	7	0	0	
5/22/2010	7	0	0	
5/23/2010	7	0	0	
5/24/2010	7	0	0	
5/25/2010	7	347.6	308.7	
5/26/2010	7	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

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### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
5/27/2010	7	0	0	
5/28/2010	7	0	0	
5/29/2010	7	0	0	
5/30/2010	7	0	0	
5/31/2010	7	0	0	
6/1/2010	7	0	0	
6/2/2010	7	0	0	
6/3/2010	7	0	0	
6/4/2010	7	0	0	
6/5/2010	7	0	0	
6/6/2010	7	0	0	
6/7/2010	7	0	0	
6/8/2010	7	0	0	
6/9/2010	7	0	0	
6/10/2010	7	0	0	
6/11/2010	7	0	0	
6/12/2010	7	0	0	
6/13/2010	7	0	0	
6/14/2010	7	0	0	
6/15/2010	7	0	0	
6/16/2010	7	0	0	
6/17/2010	7	0	0	
6/18/2010	7	0	0	
6/19/2010	7	0	0	
6/20/2010	7	0	0	
6/21/2010	7	0	0	
6/22/2010	7	0	0	
6/23/2010	7	0	0	
6/24/2010	7	0	0	
6/25/2010	7	0	0	
6/26/2010	7	0	0	
6/27/2010	7	0	0	
6/28/2010	7	0	0	
6/29/2010	7	0	0	
6/30/2010	7	0	0	33,119.00
7/1/2010	7	0.2	0.2	
7/2/2010	7	0	0	
7/3/2010	7	0	0	
7/4/2010	7	0	0	
7/5/2010	7	0	0	
7/6/2010	7	0	0	
7/7/2010	7	0	0	
7/8/2010	7	0	0	
7/9/2010	7	0	0	
7/10/2010	7	0	0	
7/11/2010	7	0	0	
7/12/2010	7	0	0	
7/13/2010	7	0	0	
7/14/2010	7	0	0	
7/15/2010	7	0	0	
7/16/2010	7	0	0	
7/17/2010	7	0	0	
7/18/2010	7	0	0	
7/19/2010	7	0	0	
7/20/2010	7	0	0	
7/21/2010	7	587.7	525.5	
7/22/2010	7	0	0	
7/23/2010	7	0	0	
7/24/2010	7	0	0	
7/25/2010	7	0	0	
7/26/2010	7	0	0	
7/27/2010	7	0	0	
7/28/2010	7	0	0	
7/29/2010	7	0	0	
7/30/2010	7	0	0	
7/31/2010	7	0	0	
8/1/2010	7	0	0	

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
8/2/2010	7	0	0	
8/3/2010	7	0	0	
8/4/2010	7	0	0	
8/5/2010	7	0	0	
8/6/2010	7	0	0	
8/7/2010	7	0	0	
8/8/2010	7	0	0	
8/9/2010	7	0	0	
8/10/2010	7	0	0	
8/11/2010	7	0	0	
8/12/2010	7	0	0	
8/13/2010	7	0	0	
8/14/2010	7	0	0	
8/15/2010	7	0	0	
8/16/2010	7	0	0	
8/17/2010	7	0	0	
8/18/2010	7	0	0	
8/19/2010	7	0	0	
8/20/2010	7	0	0	
8/21/2010	7	0	0	
8/22/2010	7	0	0	
8/23/2010	7	0	0	
8/24/2010	7	0	0	
8/25/2010	7	0	0	
8/26/2010	7	0	0	
8/27/2010	7	0	0	
8/28/2010	7	0	0	
8/29/2010	7	0	0	
8/30/2010	7	0	0	
8/31/2010	7	0	0	
9/1/2010	7	0	0	
9/2/2010	7	0	0	
9/3/2010	7	0	0	
9/4/2010	7	0	0	
9/5/2010	7	0	0	
9/6/2010	7	0	0	
9/7/2010	7	0	0	
9/8/2010	7	0	0	
9/9/2010	7	0	0	
9/10/2010	7	0	0	
9/11/2010	7	0	0	
9/12/2010	7	0	0	
9/13/2010	7	0	0	
9/14/2010	7	0	0	
9/15/2010	7	0	0	
9/16/2010	7	0	0	
9/17/2010	7	0	0	
9/18/2010	7	0	0	
9/19/2010	7	0	0	
9/20/2010	7	0	0	
9/21/2010	7	0	0	
9/22/2010	7	0	0	
9/23/2010	7	0	0	
9/24/2010	7	0	0	
9/25/2010	7	0	0	
9/26/2010	7	0	0	
9/27/2010	7	0	0	
9/28/2010	7	0	0	
9/29/2010	7	0	0	
9/30/2010	7	0	0	
10/1/2008	8	1,149.50	1,043.10	
10/2/2008	8	610.9	554.3	
10/3/2008	8	0	0	
10/4/2008	8	0	0	
10/5/2008	8	0	0	
10/6/2008	8	0	0	
10/7/2008	8	0	0	

587.90 Baseline Period 10/01/2008 to 9/30/2010

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
10/8/2008	8	0	0	
10/9/2008	8	0	0	
10/10/2008	8	659.4	598.4	
10/11/2008	8	1,138.90	1,033.50	
10/12/2008	8	1,127.60	1,023.20	
10/13/2008	8	1,048.80	951.8	
10/14/2008	8	1,124.20	1,020.10	
10/15/2008	8	1,122.80	1,018.90	
10/16/2008	8	1,128.40	1,023.90	
10/17/2008	8	1,129.60	1,025.10	
10/18/2008	8	1,135.80	1,030.70	
10/19/2008	8	1,136.00	1,030.80	
10/20/2008	8	1,136.00	1,030.90	
10/21/2008	8	1,135.30	1,030.30	
10/22/2008	8	1,132.70	1,027.80	
10/23/2008	8	1,129.30	1,024.80	
10/24/2008	8	1,122.10	1,018.30	
10/25/2008	8	1,128.00	1,023.60	
10/26/2008	8	1,130.90	1,026.20	
10/27/2008	8	1,128.80	1,024.30	
10/28/2008	8	1,125.40	1,021.30	
10/29/2008	8	1,124.80	1,020.70	
10/30/2008	8	1,126.30	1,022.10	
10/31/2008	8	1,125.00	1,020.90	
11/1/2008	8	1,127.00	1,022.70	
11/2/2008	8	1,155.00	1,048.10	
11/3/2008	8	1,047.50	950.6	
11/4/2008	8	1,109.30	1,006.80	
11/5/2008	8	1,118.20	1,014.70	
11/6/2008	8	1,124.50	1,020.40	
11/7/2008	8	1,126.40	1,022.10	
11/8/2008	8	1,132.20	1,027.30	
11/9/2008	8	1,124.40	1,020.30	
11/10/2008	8	1,129.90	1,025.30	
11/11/2008	8	1,130.80	1,026.10	
11/12/2008	8	1,133.20	1,028.30	
11/13/2008	8	1,128.80	1,024.40	
11/14/2008	8	1,126.00	1,021.70	
11/15/2008	8	1,122.80	1,018.90	
11/16/2008	8	1,122.90	1,018.90	
11/17/2008	8	981.1	890.3	
11/18/2008	8	1,137.10	1,031.80	
11/19/2008	8	1,127.30	1,022.90	
11/20/2008	8	1,123.30	1,019.30	
11/21/2008	8	1,124.10	1,020.00	
11/22/2008	8	1,122.40	1,018.50	
11/23/2008	8	1,120.40	1,016.70	
11/24/2008	8	1,124.70	1,020.60	
11/25/2008	8	1,123.50	1,019.50	
11/26/2008	8	1,124.80	1,020.60	
11/27/2008	8	1,121.30	1,017.50	
11/28/2008	8	1,125.90	1,021.70	
11/29/2008	8	1,126.20	1,022.00	
11/30/2008	8	1,123.90	1,019.90	
12/1/2008	8	1,113.80	1,010.70	
12/2/2008	8	1,112.80	1,009.80	
12/3/2008	8	1,114.80	1,011.60	
12/4/2008	8	1,115.90	1,012.60	
12/5/2008	8	1,124.80	1,020.70	
12/6/2008	8	1,127.00	1,022.70	
12/7/2008	8	1,130.50	1,025.90	
12/8/2008	8	1,131.20	1,026.50	
12/9/2008	8	1,131.50	1,026.70	
12/10/2008	8	1,136.10	1,030.90	
12/11/2008	8	1,138.90	1,033.50	
12/12/2008	8	1,140.20	1,034.70	
12/13/2008	8	1,127.10	1,022.70	

# MDW34Z COGEN FUEL USAGE ALL UNITS

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Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
12/14/2008	8	1,124.30	1,020.20	
12/15/2008	8	1,126.00	1,021.80	
12/16/2008	8	1,126.20	1,021.90	
12/17/2008	8	1,114.80	1,011.60	
12/18/2008	8	1,121.80	1,018.00	
12/19/2008	8	1,128.30	1,023.80	
12/20/2008	8	1,125.70	1,021.50	
12/21/2008	8	1,129.60	1,025.00	
12/22/2008	8	1,126.40	1,022.10	
12/23/2008	8	1,129.90	1,025.30	
12/24/2008	8	1,141.10	1,035.50	
12/25/2008	8	1,114.20	1,011.10	
12/26/2008	8	1,105.80	1,003.50	
12/27/2008	8	1,107.70	1,005.20	
12/28/2008	8	1,109.40	1,006.70	
12/29/2008	8	1,108.50	1,005.90	
12/30/2008	8	1,111.70	1,008.80	
12/31/2008	8	1,109.50	1,006.80	94,428.90
1/1/2009	8	1,109.00	1,006.40	
1/2/2009	8	1,094.10	992.8	
1/3/2009	8	1,135.70	1,030.50	
1/4/2009	8	1,129.20	1,024.70	
1/5/2009	8	1,144.80	1,038.80	
1/6/2009	8	1,142.50	1,036.80	
1/7/2009	8	1,143.70	1,037.80	
1/8/2009	8	1,132.80	1,027.90	
1/9/2009	8	1,117.40	1,014.00	
1/10/2009	8	1,133.70	1,028.70	
1/11/2009	8	1,131.60	1,026.80	
1/12/2009	8	1,125.50	1,021.30	
1/13/2009	8	1,124.20	1,020.20	
1/14/2009	8	1,121.40	1,017.60	
1/15/2009	8	1,124.50	1,020.50	
1/16/2009	8	728.6	661.2	
1/17/2009	8	0	0	
1/18/2009	8	0	0	
1/19/2009	8	0	0	
1/20/2009	8	0	0	
1/21/2009	8	0	0	
1/22/2009	8	0	0	
1/23/2009	8	0	0	
1/24/2009	8	0	0	
1/25/2009	8	0	0	
1/26/2009	8	0	0	
1/27/2009	8	376.7	341.9	
1/28/2009	8	1,109.30	1,006.70	
1/29/2009	8	1,121.90	1,018.00	
1/30/2009	8	1,129.20	1,024.70	
1/31/2009	8	1,132.80	1,028.00	
2/1/2009	8	1,134.80	1,029.70	
2/2/2009	8	1,136.70	1,031.40	
2/3/2009	8	1,129.60	1,025.10	
2/4/2009	8	1,128.90	1,024.40	
2/5/2009	8	1,120.80	1,017.00	
2/6/2009	8	1,119.80	1,016.20	
2/7/2009	8	1,116.10	1,012.80	
2/8/2009	8	1,119.60	1,015.90	
2/9/2009	8	1,118.30	1,014.80	
2/10/2009	8	1,120.10	1,016.40	
2/11/2009	8	1,125.20	1,021.10	
2/12/2009	8	1,125.10	1,020.90	
2/13/2009	8	1,124.20	1,020.20	
2/14/2009	8	731.1	663.4	
2/15/2009	8	0	0	
2/16/2009	8	668.9	607	
2/17/2009	8	1,121.70	1,017.90	
2/18/2009	8	1,116.80	1,013.40	



# MDW34Z COGEN FUEL USAGE ALL UNITS

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
2/19/2009	8	900.5	817.2	
2/20/2009	8	0	0	
2/21/2009	8	0	0	
2/22/2009	8	0	0	
2/23/2009	8	0	0	
2/24/2009	8	0	0	
2/25/2009	8	0	0	
2/26/2009	8	0	0	
2/27/2009	8	0	0	
2/28/2009	8	0	0	
3/1/2009	8	0	0	
3/2/2009	8	0	0	
3/3/2009	8	0	0	
3/4/2009	8	0	0	
3/5/2009	8	0	0	
3/6/2009	8	0	0	
3/7/2009	8	0	0	
3/8/2009	8	0	0	
3/9/2009	8	0	0	
3/10/2009	8	0	0	
3/11/2009	8	0	0	
3/12/2009	8	0	0	
3/13/2009	8	0	0	
3/14/2009	8	0	0	
3/15/2009	8	0	0	
3/16/2009	8	0	0	
3/17/2009	8	0	0	
3/18/2009	8	0	0	
3/19/2009	8	0	0	
3/20/2009	8	0	0	
3/21/2009	8	0	0	
3/22/2009	8	0	0	
3/23/2009	8	0	0	
3/24/2009	8	0	0	
3/25/2009	8	0	0	
3/26/2009	8	0	0	
3/27/2009	8	0	0	
3/28/2009	8	0	0	
3/29/2009	8	0	0	
3/30/2009	8	0	0	
3/31/2009	8	0	0	41,866.80
4/1/2009	8	0	0	
4/2/2009	8	0	0	
4/3/2009	8	0	0	
4/4/2009	8	0	0	
4/5/2009	8	0	0	
4/6/2009	8	458.8	415.1	
4/7/2009	8	1,054.80	954.4	
4/8/2009	8	1,050.20	950.2	
4/9/2009	8	1,068.00	966.4	
4/10/2009	8	1,088.00	984.5	
4/11/2009	8	1,093.00	989	
4/12/2009	8	1,094.20	990.1	
4/13/2009	8	1,093.20	989.1	
4/14/2009	8	1,086.90	983.4	
4/15/2009	8	1,089.10	985.5	
4/16/2009	8	1,092.00	988.1	
4/17/2009	8	1,094.90	990.7	
4/18/2009	8	1,096.60	992.2	
4/19/2009	8	1,097.20	992.8	
4/20/2009	8	1,086.20	982.8	
4/21/2009	8	1,082.00	979	
4/22/2009	8	1,076.80	974.3	
4/23/2009	8	1,073.00	970.9	
4/24/2009	8	1,074.60	972.3	
4/25/2009	8	1,054.60	954.2	
4/26/2009	8	1,057.40	956.8	

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Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
4/27/2009	8	1,057.90	957.2	
4/28/2009	8	1,057.20	956.5	
4/29/2009	8	1,058.00	957.3	
4/30/2009	8	1,081.50	960.5	
5/1/2009	8	1,085.20	963.8	
5/2/2009	8	1,066.20	964.8	
5/3/2009	8	1,064.80	963.5	
5/4/2009	8	1,065.80	964.3	
5/5/2009	8	1,064.50	963.2	
5/6/2009	8	1,064.90	963.5	
5/7/2009	8	1,064.10	962.8	
5/8/2009	8	1,087.40	965.8	
5/9/2009	8	1,070.30	968.5	
5/10/2009	8	1,071.40	969.4	
5/11/2009	8	1,072.60	970.5	
5/12/2009	8	1,073.20	971.1	
5/13/2009	8	1,078.30	973.8	
5/14/2009	8	627.8	568	
5/15/2009	8	1,063.50	962.3	
5/16/2009	8	1,062.20	961.1	
5/17/2009	8	1,062.30	961.2	
5/18/2009	8	1,064.70	963.4	
5/19/2009	8	1,087.50	966	
5/20/2009	8	1,064.60	963.3	
5/21/2009	8	1,052.40	952.3	
5/22/2009	8	1,053.20	953	
5/23/2009	8	1,055.90	955.4	
5/24/2009	8	1,060.60	959.7	
5/25/2009	8	1,081.40	960.4	
5/26/2009	8	1,060.70	959.8	
5/27/2009	8	1,060.40	959.5	
5/28/2009	8	1,059.30	958.5	
5/29/2009	8	1,059.50	956.7	
5/30/2009	8	1,060.50	959.5	
5/31/2009	8	1,057.60	957	
6/1/2009	8	1,058.40	957.7	
6/2/2009	8	1,082.70	961.6	
6/3/2009	8	1,062.50	961.4	
6/4/2009	8	1,066.70	965.1	
6/5/2009	8	1,062.40	961.3	
6/6/2009	8	1,064.50	963.2	
6/7/2009	8	1,067.20	965.6	
6/8/2009	8	1,066.70	965.2	
6/9/2009	8	1,064.50	963.2	
6/10/2009	8	1,060.30	959.4	
6/11/2009	8	1,083.20	962	
6/12/2009	8	1,087.50	966	
6/13/2009	8	1,042.60	943.4	
6/14/2009	8	1,056.20	955.7	
6/15/2009	8	1,083.50	962.3	
6/16/2009	8	1,061.70	960.6	
6/17/2009	8	1,059.90	959.1	
6/18/2009	8	1,057.90	957.3	
6/19/2009	8	1,061.60	960.6	
6/20/2009	8	1,062.40	961.3	
6/21/2009	8	1,064.90	963.5	
6/22/2009	8	1,064.90	963.5	
6/23/2009	8	1,062.20	961.1	
6/24/2009	8	1,056.00	955.5	
6/25/2009	8	1,066.20	964.8	
6/26/2009	8	1,056.80	956.2	
6/27/2009	8	1,057.30	956.7	
6/28/2009	8	1,055.70	955.2	
6/29/2009	8	1,059.70	958.9	
6/30/2009	8	1,063.60	962.4	90,676.60
7/1/2009	8	1,062.40	961.3	
7/2/2009	8	1,052.20	952.1	

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
7/3/2009	8	1,028.80	930.7	
7/4/2009	8	1,047.80	948.1	
7/5/2009	8	1,048.00	948.3	
7/6/2009	8	1,046.30	946.7	
7/7/2009	8	1,051.30	951.2	
7/8/2009	8	1,041.00	941.9	
7/9/2009	8	1,040.70	941.7	
7/10/2009	8	1,042.70	943.6	
7/11/2009	8	1,046.10	946.6	
7/12/2009	8	1,075.50	973.2	
7/13/2009	8	341.2	308.8	
7/14/2009	8	671.2	607.3	
7/15/2009	8	1,033.40	935.1	
7/16/2009	8	1,038.80	939.8	
7/17/2009	8	1,036.60	938	
7/18/2009	8	1,041.40	942.3	
7/19/2009	8	1,033.60	935.3	
7/20/2009	8	1,032.80	934.6	
7/21/2009	8	1,037.00	938.3	
7/22/2009	8	1,040.30	941.4	
7/23/2009	8	1,040.60	941.6	
7/24/2009	8	1,038.40	939.6	
7/25/2009	8	1,040.70	941.7	
7/26/2009	8	1,041.30	942.2	
7/27/2009	8	1,042.40	943.2	
7/28/2009	8	1,041.20	942.1	
7/29/2009	8	1,043.70	944.4	
7/30/2009	8	1,045.00	945.5	
7/31/2009	8	1,037.00	938.3	
8/1/2009	8	1,044.50	945.1	
8/2/2009	8	1,052.80	952.6	
8/3/2009	8	1,056.60	956	
8/4/2009	8	1,057.10	956.5	
8/5/2009	8	1,054.00	953.7	
8/6/2009	8	1,047.90	948.2	
8/7/2009	8	1,047.80	948	
8/8/2009	8	1,052.80	952.6	
8/9/2009	8	1,050.80	950.8	
8/10/2009	8	1,008.70	912.7	
8/11/2009	8	1,048.20	948.5	
8/12/2009	8	1,057.60	957	
8/13/2009	8	1,054.40	954	
8/14/2009	8	1,050.40	950.5	
8/15/2009	8	1,052.60	952.4	
8/16/2009	8	1,052.80	952.5	
8/17/2009	8	1,053.50	953.2	
8/18/2009	8	1,052.00	951.9	
8/19/2009	8	1,056.50	956	
8/20/2009	8	1,054.50	954.2	
8/21/2009	8	1,051.00	950.9	
8/22/2009	8	1,043.50	944.3	
8/23/2009	8	1,041.10	942	
8/24/2009	8	1,046.50	946.9	
8/25/2009	8	1,049.80	949.9	
8/26/2009	8	1,048.00	948.3	
8/27/2009	8	1,052.50	952.3	
8/28/2009	8	1,051.30	951.2	
8/29/2009	8	1,053.30	953.1	
8/30/2009	8	1,052.10	951.9	
8/31/2009	8	1,055.60	955.2	
9/1/2009	8	526.1	476	
9/2/2009	8	0	0	
9/3/2009	8	22.6	20.5	
9/4/2009	8	0	0	
9/5/2009	8	0	0	
9/6/2009	8	0	0	
9/7/2009	8	0	0	

# MDW34Z COGEN FUEL USAGE ALL UNITS

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
9/8/2009	8	645.4	584	
9/9/2009	8	1,080.50	977.6	
9/10/2009	8	1,082.00	979	
9/11/2009	8	1,080.40	977.6	
9/12/2009	8	1,081.30	978.4	
9/13/2009	8	1,080.40	977.6	
9/14/2009	8	1,073.20	971.1	
9/15/2009	8	1,069.10	967.3	
9/16/2009	8	1,068.80	967.1	
9/17/2009	8	1,067.50	965.9	
9/18/2009	8	1,070.30	968.5	
9/19/2009	8	1,072.40	970.4	
9/20/2009	8	1,076.40	973.9	
9/21/2009	8	1,070.10	968.3	
9/22/2009	8	1,071.70	969.7	
9/23/2009	8	1,067.70	966.1	
9/24/2009	8	1,067.60	966	
9/25/2009	8	1,068.60	966.9	
9/26/2009	8	1,069.70	967.9	
9/27/2009	8	1,065.70	964.3	
9/28/2009	8	1,069.20	967.4	
9/29/2009	8	1,066.30	964.8	
9/30/2009	8	1,064.00	962.7	88,586.10
10/1/2009	8	1,109.80	1,004.20	
10/2/2009	8	1,004.90	909.2	
10/3/2009	8	844	763.7	
10/4/2009	8	880.7	796.9	
10/5/2009	8	959.4	868.1	
10/6/2009	8	1,060.10	959.2	
10/7/2009	8	1,073.90	971.7	
10/8/2009	8	1,075.70	973.3	
10/9/2009	8	1,073.90	971.7	
10/10/2009	8	1,072.60	970.5	
10/11/2009	8	1,077.40	974.9	
10/12/2009	8	1,077.40	974.9	
10/13/2009	8	861	779.1	
10/14/2009	8	1,073.10	971	
10/15/2009	8	1,070.50	968.7	
10/16/2009	8	1,064.30	963	
10/17/2009	8	776.2	702.4	
10/18/2009	8	1,080.60	977.8	
10/19/2009	8	1,073.10	971	
10/20/2009	8	1,071.60	969.7	
10/21/2009	8	689	621.4	
10/22/2009	8	440.6	395.8	
10/23/2009	8	649.5	583.4	
10/24/2009	8	1,085.70	975.4	
10/25/2009	8	1,085.50	975.1	
10/26/2009	8	1,102.60	990.6	
10/27/2009	8	1,093.00	981.9	
10/28/2009	8	1,058.00	950.5	
10/29/2009	8	1,083.40	973.3	
10/30/2009	8	1,102.00	990	
10/31/2009	8	1,101.20	989.2	
11/1/2009	8	1,061.50	953.6	
11/2/2009	8	1,012.90	909.9	
11/3/2009	8	1,001.20	899.5	
11/4/2009	8	1,057.00	949.6	
11/5/2009	8	1,057.70	950.2	
11/6/2009	8	1,060.30	952.6	
11/7/2009	8	1,053.70	946.6	
11/8/2009	8	1,053.60	946.7	
11/9/2009	8	882.4	792.7	
11/10/2009	8	1,073.40	964.3	
11/11/2009	8	1,059.00	951.3	
11/12/2009	8	1,048.80	942.2	
11/13/2009	8	1,057.90	950.4	

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
11/14/2009	8	1,064.30	958.2	
11/15/2009	8	1,063.60	955.5	
11/16/2009	8	1,061.00	953.1	
11/17/2009	8	1,052.40	945.4	
11/18/2009	8	576	517.4	
11/19/2009	8	1,081.10	971.2	
11/20/2009	8	1,083.30	973.1	
11/21/2009	8	1,084.90	974.6	
11/22/2009	8	1,091.00	980.1	
11/23/2009	8	1,092.10	981.1	
11/24/2009	8	1,089.80	979.1	
11/25/2009	8	1,088.80	978.1	
11/26/2009	8	1,090.00	979.2	
11/27/2009	8	1,092.30	981.3	
11/28/2009	8	1,092.30	981.3	
11/29/2009	8	1,091.80	980.8	
11/30/2009	8	1,092.70	981.7	
12/1/2009	8	1,090.80	979.9	
12/2/2009	8	1,093.50	982.4	
12/3/2009	8	1,097.90	986.3	
12/4/2009	8	264.2	237.4	
12/5/2009	8	747.8	671.8	
12/6/2009	8	939	843.5	
12/7/2009	8	1,024.30	920.2	
12/8/2009	8	1,068.40	959.8	
12/9/2009	8	1,084.60	974.4	
12/10/2009	8	1,087.80	977.2	
12/11/2009	8	1,043.00	937	
12/12/2009	8	1,009.70	907	
12/13/2009	8	1,037.70	932.2	
12/14/2009	8	1,051.60	944.7	
12/15/2009	8	1,069.40	960.7	
12/18/2009	8	1,077.50	968	
12/17/2009	8	1,082.30	972.2	
12/18/2009	8	1,079.30	969.6	
12/19/2009	8	575.7	517.2	
12/20/2009	8	0	0	
12/21/2009	8	625.2	561.6	
12/22/2009	8	1,094.80	983.5	
12/23/2009	8	1,087.80	977.3	
12/24/2009	8	1,089.80	979	
12/25/2009	8	1,093.50	982.4	
12/28/2009	8	1,096.00	984.6	
12/27/2009	8	1,095.80	984.4	
12/28/2009	8	757.4	680.4	
12/29/2009	8	1,099.80	987.8	
12/30/2009	8	1,090.30	979.5	
12/31/2009	8	1,095.80	984.4	91,988.30
1/1/2010	8	1,099.50	987.8	
1/2/2010	8	1,101.50	989.6	
1/3/2010	8	1,100.40	988.8	
1/4/2010	8	1,098.70	987	
1/5/2010	8	1,096.80	985.3	
1/6/2010	8	1,099.90	988.1	
1/7/2010	8	1,100.10	988.3	
1/8/2010	8	1,105.00	992.7	
1/9/2010	8	1,106.50	994	
1/10/2010	8	1,104.30	992.1	
1/11/2010	8	1,103.40	991.3	
1/12/2010	8	1,033.10	928.1	
1/13/2010	8	998.1	898.7	
1/14/2010	8	993.2	892.3	
1/15/2010	8	992.7	891.8	
1/16/2010	8	994.5	893.4	
1/17/2010	8	1,075.40	968.1	
1/18/2010	8	862.2	774.8	
1/19/2010	8	1,089.80	979.1	

# MDW34Z COGEN FUEL USAGE ALL UNITS

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## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
1/20/2010	8	1,089.60	978.8	
1/21/2010	8	1,095.60	980.5	
1/22/2010	8	1,097.60	974.9	
1/23/2010	8	1,100.90	977.8	
1/24/2010	8	1,102.00	978.8	
1/25/2010	8	1,094.00	971.6	
1/26/2010	8	1,087.90	966.3	
1/27/2010	8	233	206.9	
1/28/2010	8	0	0	
1/29/2010	8	425.2	377.7	
1/30/2010	8	1,070.30	950.7	
1/31/2010	8	1,073.40	953.4	
2/1/2010	8	1,075.80	955.5	
2/2/2010	8	1,077.80	957.3	
2/3/2010	8	1,082.60	961.5	
2/4/2010	8	1,084.30	963.1	
2/5/2010	8	1,082.90	961.8	
2/6/2010	8	1,078.50	957.9	
2/7/2010	8	1,078.60	958	
2/8/2010	8	1,081.80	960.8	
2/9/2010	8	1,078.20	957.6	
2/10/2010	8	1,079.20	958.5	
2/11/2010	8	1,089.60	967.8	
2/12/2010	8	1,050.90	933.4	
2/13/2010	8	1,087.80	966.1	
2/14/2010	8	1,080.50	959.7	
2/15/2010	8	1,089.80	967.9	
2/16/2010	8	1,015.90	902.3	
2/17/2010	8	879	780.7	
2/18/2010	8	427.3	379.5	
2/19/2010	8	0	0	
2/20/2010	8	0	0	
2/21/2010	8	0	0	
2/22/2010	8	0	0	
2/23/2010	8	0	0	
2/24/2010	8	0	0	
2/25/2010	8	0	0	
2/26/2010	8	0	0	
2/27/2010	8	0	0	
2/28/2010	8	895.9	795.7	
3/1/2010	8	1,081.60	960.7	
3/2/2010	8	1,077.30	956.9	
3/3/2010	8	1,072.90	952.9	
3/4/2010	8	1,070.30	950.6	
3/5/2010	8	968.1	859.9	
3/6/2010	8	811.3	720.6	
3/7/2010	8	1,088.20	966.6	
3/8/2010	8	1,092.00	969.9	
3/9/2010	8	721.8	641.1	
3/10/2010	8	1,089.90	968	
3/11/2010	8	1,079.60	958.9	
3/12/2010	8	1,088.80	967.1	
3/13/2010	8	1,087.10	965.6	
3/14/2010	8	1,084.50	963.2	
3/15/2010	8	1,088.70	966.9	
3/16/2010	8	1,094.30	971.9	
3/17/2010	8	1,079.60	958.9	
3/18/2010	8	1,070.80	951.1	
3/19/2010	8	1,076.20	955.9	
3/20/2010	8	1,088.80	967.1	
3/21/2010	8	1,089.90	968	
3/22/2010	8	706.3	627.3	
3/23/2010	8	0	0	
3/24/2010	8	0	0	
3/25/2010	8	0	0	
3/26/2010	8	0	0	
3/27/2010	8	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

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### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
3/28/2010	8	0	0	
3/29/2010	8	0	0	
3/30/2010	8	0	0	
3/31/2010	8	0	0	72,749.00
4/1/2010	8	0	0	
4/2/2010	8	0	0	
4/3/2010	8	0	0	
4/4/2010	8	0	0	
4/5/2010	8	752.5	668.3	
4/6/2010	8	1,095.00	972.5	
4/7/2010	8	1,063.20	944.3	
4/8/2010	8	1,062.60	943.8	
4/9/2010	8	540	479.7	
4/10/2010	8	0	0	
4/11/2010	8	0	0	
4/12/2010	8	0	0	
4/13/2010	8	0	0	
4/14/2010	8	0	0	
4/15/2010	8	0	0	
4/16/2010	8	0	0	
4/17/2010	8	0	0	
4/18/2010	8	0	0	
4/19/2010	8	0	0	
4/20/2010	8	0	0	
4/21/2010	8	0	0	
4/22/2010	8	0	0	
4/23/2010	8	0	0	
4/24/2010	8	0	0	
4/25/2010	8	0	0	
4/26/2010	8	0	0	
4/27/2010	8	0	0	
4/28/2010	8	0	0	
4/29/2010	8	473.4	420.5	
4/30/2010	8	956.4	849.4	
5/1/2010	8	950.2	844	
5/2/2010	8	953.4	846.8	
5/3/2010	8	951.6	845.2	
5/4/2010	8	955	848.2	
5/5/2010	8	953.3	846.7	
5/6/2010	8	516.7	458.9	
5/7/2010	8	1,074.00	953.9	
5/8/2010	8	1,071.30	951.5	
5/9/2010	8	1,071.60	951.8	
5/10/2010	8	1,069.60	950	
5/11/2010	8	1,071.50	951.7	
5/12/2010	8	1,072.70	952.8	
5/13/2010	8	1,072.00	952.2	
5/14/2010	8	1,076.90	956.5	
5/15/2010	8	1,080.60	959.8	
5/16/2010	8	1,083.00	961.9	
5/17/2010	8	1,073.30	953.2	
5/18/2010	8	1,069.30	949.8	
5/19/2010	8	1,068.30	948.8	
5/20/2010	8	1,004.20	892	
5/21/2010	8	1,063.40	944.5	
5/22/2010	8	1,061.80	943.1	
5/23/2010	8	1,061.30	942.6	
5/24/2010	8	1,060.10	941.6	
5/25/2010	8	1,014.50	901.1	
5/26/2010	8	1,086.90	965.3	
5/27/2010	8	856.5	760.7	
5/28/2010	8	1,114.30	989.7	
5/29/2010	8	871	773.6	
5/30/2010	8	1,054.50	936.6	
5/31/2010	8	948.8	842.7	
6/1/2010	8	968.7	860.3	
6/2/2010	8	974.5	865.5	

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## ALL UNITS

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### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
6/3/2010	8	600.3	533.2	
6/4/2010	8	1,113.30	988.8	
6/5/2010	8	900.8	799.9	
6/6/2010	8	1,084.10	962.9	
6/7/2010	8	1,052.60	934.9	
6/8/2010	8	1,052.60	934.9	
6/9/2010	8	1,052.70	935	
6/10/2010	8	1,059.90	941.4	
6/11/2010	8	1,085.70	964.3	
6/12/2010	8	1,089.20	949.7	
6/13/2010	8	1,056.10	938	
6/14/2010	8	1,058.50	940.2	
6/15/2010	8	1,061.70	943	
6/16/2010	8	1,051.50	934	
6/17/2010	8	1,058.30	938.2	
6/18/2010	8	1,056.60	938.4	
6/19/2010	8	1,059.40	941	
6/20/2010	8	1,060.80	942.2	
6/21/2010	8	1,052.80	935.1	
6/22/2010	8	1,059.90	941.4	
6/23/2010	8	1,067.10	947.8	
6/24/2010	8	1,067.80	948.3	
6/25/2010	8	1,065.80	946.8	
6/26/2010	8	1,063.00	944.1	
6/27/2010	8	1,061.00	942.4	
6/28/2010	8	1,058.80	938.4	
6/29/2010	8	1,058.20	939.9	
6/30/2010	8	1,059.80	941.1	68,461.40
7/1/2010	8	1,061.60	942.9	
7/2/2010	8	1,047.90	934.3	
7/3/2010	8	1,044.40	933.8	
7/4/2010	8	1,049.40	938.2	
7/5/2010	8	1,042.20	931.8	
7/6/2010	8	1,041.80	931.3	
7/7/2010	8	1,044.70	934	
7/8/2010	8	1,042.10	931.7	
7/9/2010	8	1,039.80	929.6	
7/10/2010	8	1,042.10	931.7	
7/11/2010	8	839.8	750.9	
7/12/2010	8	962.4	860.4	
7/13/2010	8	1,042.90	932.4	
7/14/2010	8	1,043.50	933	
7/15/2010	8	1,046.00	935.2	
7/16/2010	8	1,047.00	936.1	
7/17/2010	8	1,049.70	938.5	
7/18/2010	8	1,049.90	938.7	
7/19/2010	8	1,050.00	938.8	
7/20/2010	8	1,063.80	951.1	
7/21/2010	8	189.2	169.2	
7/22/2010	8	506.1	452.5	
7/23/2010	8	1,057.80	945.8	
7/24/2010	8	1,051.30	939.9	
7/25/2010	8	1,051.70	940.3	
7/26/2010	8	1,053.40	941.8	
7/27/2010	8	1,052.40	940.9	
7/28/2010	8	1,053.60	942	
7/29/2010	8	1,052.40	941	
7/30/2010	8	1,054.00	942.4	
7/31/2010	8	1,053.60	942	
8/1/2010	8	1,055.90	944.1	
8/2/2010	8	1,059.20	947.1	
8/3/2010	8	1,063.30	950.7	
8/4/2010	8	1,061.20	949.4	
8/5/2010	8	1,060.50	949.2	
8/6/2010	8	1,061.40	950.1	
8/7/2010	8	1,063.70	952.1	
8/8/2010	8	1,066.60	954.6	



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## ALL UNITS

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Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
8/9/2010	8	1,060.30	949.1	
8/10/2010	8	1,065.50	953.7	
8/11/2010	8	1,067.30	955.3	
8/12/2010	8	1,062.40	950.9	
8/13/2010	8	1,063.40	951.8	
8/14/2010	8	1,097.60	982.5	
8/15/2010	8	1,083.10	969.5	
8/16/2010	8	1,065.40	953.6	
8/17/2010	8	1,065.50	953.7	
8/18/2010	8	1,067.90	955.9	
8/19/2010	8	1,070.50	958.2	
8/20/2010	8	1,069.40	957.2	
8/21/2010	8	1,071.70	959.3	
8/22/2010	8	1,072.40	959.8	
8/23/2010	8	1,075.00	962.2	
8/24/2010	8	1,074.30	961.6	
8/25/2010	8	1,088.50	956.4	
8/26/2010	8	1,063.90	952.3	
8/27/2010	8	1,076.60	963.6	
8/28/2010	8	1,070.90	958.5	
8/29/2010	8	1,071.30	958.9	
8/30/2010	8	1,073.10	960.5	
8/31/2010	8	1,076.60	963.7	
9/1/2010	8	1,077.60	964.5	
9/2/2010	8	1,077.60	964.5	
9/3/2010	8	1,076.10	963.2	
9/4/2010	8	1,074.40	961.7	
9/5/2010	8	1,070.50	958.1	
9/6/2010	8	1,067.30	955.4	
9/7/2010	8	1,073.30	960.7	
9/8/2010	8	1,076.20	963.3	
9/9/2010	8	1,079.40	966.2	
9/10/2010	8	1,078.50	965.4	
9/11/2010	8	1,071.00	958.6	
9/12/2010	8	1,066.90	954.9	
9/13/2010	8	1,071.80	959.4	
9/14/2010	8	1,073.80	961.1	
9/15/2010	8	1,074.90	962.1	
9/16/2010	8	1,073.50	960.9	
9/17/2010	8	1,079.60	966.3	
9/18/2010	8	1,076.30	963.4	
9/19/2010	8	1,070.10	957.8	
9/20/2010	8	1,068.40	956.3	
9/21/2010	8	1,069.50	957.3	
9/22/2010	8	1,076.90	963.9	
9/23/2010	8	1,074.80	962	
9/24/2010	8	1,077.40	964.3	
9/25/2010	8	1,072.50	959.9	
9/26/2010	8	1,070.30	957.9	
9/27/2010	8	1,070.10	957.9	
9/28/2010	8	1,070.60	958.3	
9/29/2010	8	1,065.20	953.4	
9/30/2010	8	1,074.70	962	
10/1/2008	9	1,120.40	1,016.70	
10/2/2008	9	1,119.10	1,015.50	
10/3/2008	9	1,104.60	1,002.40	
10/4/2008	9	1,097.10	995.6	
10/5/2008	9	1,085.40	985	
10/6/2008	9	1,076.60	977	
10/7/2008	9	1,064.10	965.6	
10/8/2008	9	1,054.20	956.6	
10/9/2008	9	1,072.70	973.4	
10/10/2008	9	447	405.6	
10/11/2008	9	0	0	
10/12/2008	9	0	0	
10/13/2008	9	0.4	0.4	
10/14/2008	9	0	0	

98,149.90 Baseline Period 10/01/2008 to 9/30/2010

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
10/15/2008	9	0	0	
10/16/2008	9	0	0	
10/17/2008	9	0	0	
10/18/2008	9	0	0	
10/19/2008	9	0	0	
10/20/2008	9	0	0	
10/21/2008	9	0	0	
10/22/2008	9	0	0	
10/23/2008	9	0	0	
10/24/2008	9	0	0	
10/25/2008	9	0	0	
10/26/2008	9	0	0	
10/27/2008	9	0	0	
10/28/2008	9	0	0	
10/29/2008	9	0	0	
10/30/2008	9	0	0	
10/31/2008	9	0	0	
11/1/2008	9	0	0	
11/2/2008	9	0	0	
11/3/2008	9	0	0	
11/4/2008	9	0	0	
11/5/2008	9	0	0	
11/6/2008	9	0	0	
11/7/2008	9	0	0	
11/8/2008	9	0	0	
11/9/2008	9	0	0	
11/10/2008	9	0	0	
11/11/2008	9	0	0	
11/12/2008	9	0	0	
11/13/2008	9	0	0	
11/14/2008	9	0	0	
11/15/2008	9	0	0	
11/16/2008	9	0	0	
11/17/2008	9	0	0	
11/18/2008	9	0	0	
11/19/2008	9	0	0	
11/20/2008	9	0	0	
11/21/2008	9	0	0	
11/22/2008	9	0	0	
11/23/2008	9	0	0	
11/24/2008	9	0	0	
11/25/2008	9	0	0	
11/26/2008	9	0	0	
11/27/2008	9	0	0	
11/28/2008	9	0	0	
11/29/2008	9	0	0	
11/30/2008	9	0	0	
12/1/2008	9	0	0	
12/2/2008	9	0	0	
12/3/2008	9	0	0	
12/4/2008	9	0	0	
12/5/2008	9	0	0	
12/6/2008	9	0	0	
12/7/2008	9	0	0	
12/8/2008	9	0	0	
12/9/2008	9	0	0	
12/10/2008	9	0	0	
12/11/2008	9	0	0	
12/12/2008	9	0	0	
12/13/2008	9	0	0	
12/14/2008	9	0	0	
12/15/2008	9	0	0	
12/16/2008	9	0	0	
12/17/2008	9	0	0	
12/18/2008	9	0	0	
12/19/2008	9	0	0	
12/20/2008	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
12/21/2008	9	0	0	
12/22/2008	9	0	0	
12/23/2008	9	0	0	
12/24/2008	9	0	0	
12/25/2008	9	0	0	
12/26/2008	9	0	0	
12/27/2008	9	0	0	
12/28/2008	9	0	0	
12/29/2008	9	0	0	
12/30/2008	9	0	0	
12/31/2008	9	0	0	10,241.60
1/1/2009	9	0	0	
1/2/2009	9	0	0	
1/3/2009	9	0	0	
1/4/2009	9	0	0	
1/5/2009	9	0	0	
1/6/2009	9	0	0	
1/7/2009	9	0	0	
1/8/2009	9	0	0	
1/9/2009	9	44.1	40	
1/10/2009	9	0	0	
1/11/2009	9	0	0	
1/12/2009	9	4.6	4.2	
1/13/2009	9	0	0	
1/14/2009	9	72.8	66	
1/15/2009	9	662	600.7	
1/16/2009	9	1,125.00	1,020.90	
1/17/2009	9	1,110.80	1,008.00	
1/18/2009	9	1,108.60	1,005.90	
1/19/2009	9	1,109.40	1,006.70	
1/20/2009	9	1,109.20	1,006.60	
1/21/2009	9	1,106.10	1,003.70	
1/22/2009	9	1,106.00	1,003.60	
1/23/2009	9	1,112.40	1,009.40	
1/24/2009	9	1,112.00	1,009.10	
1/25/2009	9	1,110.30	1,007.50	
1/26/2009	9	1,109.90	1,007.20	
1/27/2009	9	1,116.60	1,013.20	
1/28/2009	9	209.5	190.1	
1/29/2009	9	0	0	
1/30/2009	9	0	0	
1/31/2009	9	0	0	
2/1/2009	9	0	0	
2/2/2009	9	0	0	
2/3/2009	9	0	0	
2/4/2009	9	0	0	
2/5/2009	9	0	0	
2/6/2009	9	0	0	
2/7/2009	9	0	0	
2/8/2009	9	0	0	
2/9/2009	9	0	0	
2/10/2009	9	0	0	
2/11/2009	9	0	0	
2/12/2009	9	0	0	
2/13/2009	9	0	0	
2/14/2009	9	394.7	358.2	
2/15/2009	9	1,115.70	1,012.40	
2/16/2009	9	1,115.00	1,011.80	
2/17/2009	9	1,119.70	1,016.10	
2/18/2009	9	1,121.20	1,017.40	
2/19/2009	9	901.4	817.9	
2/20/2009	9	0	0	
2/21/2009	9	0	0	
2/22/2009	9	0	0	
2/23/2009	9	0	0	
2/24/2009	9	0	0	
2/25/2009	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
2/26/2009	9	0	0	
2/27/2009	9	0	0	
2/28/2009	9	0	0	
3/1/2009	9	0	0	
3/2/2009	9	0	0	
3/3/2009	9	0	0	
3/4/2009	9	0	0	
3/5/2009	9	0	0	
3/6/2009	9	0	0	
3/7/2009	9	0	0	
3/8/2009	9	0	0	
3/9/2009	9	0	0	
3/10/2009	9	0	0	
3/11/2009	9	0	0	
3/12/2009	9	0	0	
3/13/2009	9	0	0	
3/14/2009	9	0	0	
3/15/2009	9	0	0	
3/16/2009	9	0	0	
3/17/2009	9	0	0	
3/18/2009	9	0	0	
3/19/2009	9	0	0	
3/20/2009	9	0	0	
3/21/2009	9	0	0	
3/22/2009	9	0	0	
3/23/2009	9	0	0	
3/24/2009	9	0	0	
3/25/2009	9	0	0	
3/26/2009	9	0	0	
3/27/2009	9	0	0	
3/28/2009	9	0	0	
3/29/2009	9	0	0	
3/30/2009	9	0	0	
3/31/2009	9	0	0	20,097.00
4/1/2009	9	0	0	
4/2/2009	9	0	0	
4/3/2009	9	0	0	
4/4/2009	9	0	0	
4/5/2009	9	0	0	
4/6/2009	9	454.8	411.6	
4/7/2009	9	1,075.90	973.5	
4/8/2009	9	1,075.00	972.7	
4/9/2009	9	1,067.80	966.2	
4/10/2009	9	1,054.00	953.7	
4/11/2009	9	1,064.90	963.6	
4/12/2009	9	1,070.00	968.2	
4/13/2009	9	523.2	473.4	
4/14/2009	9	0	0	
4/15/2009	9	0	0	
4/16/2009	9	0	0	
4/17/2009	9	0	0	
4/18/2009	9	0	0	
4/19/2009	9	0	0	
4/20/2009	9	0	0	
4/21/2009	9	0	0	
4/22/2009	9	0	0	
4/23/2009	9	0	0	
4/24/2009	9	0	0	
4/25/2009	9	0	0	
4/26/2009	9	0	0	
4/27/2009	9	0	0	
4/28/2009	9	0	0	
4/29/2009	9	0	0	
4/30/2009	9	0	0	
5/1/2009	9	0	0	
5/2/2009	9	0	0	
5/3/2009	9	0	0	

# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
5/4/2009	9	0	0	
5/5/2009	9	0	0	
5/6/2009	9	0	0	
5/7/2009	9	0	0	
5/8/2009	9	0	0	
5/9/2009	9	0	0	
5/10/2009	9	0	0	
5/11/2009	9	0	0	
5/12/2009	9	0	0	
5/13/2009	9	0	0	
5/14/2009	9	0	0	
5/15/2009	9	0	0	
5/16/2009	9	0	0	
5/17/2009	9	0	0	
5/18/2009	9	445.3	402.9	
5/19/2009	9	1,058.10	957.4	
5/20/2009	9	1,058.60	957.8	
5/21/2009	9	1,047.90	948.2	
5/22/2009	9	1,049.10	949.3	
5/23/2009	9	1,051.80	951.7	
5/24/2009	9	1,059.10	958.3	
5/25/2009	9	1,059.00	958.2	
5/26/2009	9	1,054.70	954.3	
5/27/2009	9	1,052.20	952.1	
5/28/2009	9	1,052.80	952.6	
5/29/2009	9	1,053.50	953.3	
5/30/2009	9	1,055.70	955.3	
5/31/2009	9	1,053.10	952.8	
6/1/2009	9	1,054.20	953.9	
6/2/2009	9	1,067.40	956.7	
6/3/2009	9	1,058.00	957.4	
6/4/2009	9	1,067.00	965.4	
6/5/2009	9	1,064.30	963	
6/6/2009	9	1,064.60	963.4	
6/7/2009	9	1,063.50	962.3	
6/8/2009	9	1,062.70	961.5	
6/9/2009	9	1,061.10	960.1	
6/10/2009	9	1,058.10	957.4	
6/11/2009	9	1,060.50	959.6	
6/12/2009	9	1,067.30	965.7	
6/13/2009	9	1,064.50	963.2	
6/14/2009	9	1,064.10	962.8	
6/15/2009	9	1,060.60	959.7	
6/16/2009	9	1,064.30	963	
6/17/2009	9	1,066.50	965	
6/18/2009	9	1,064.50	963.2	
6/19/2009	9	1,062.60	961.5	
6/20/2009	9	1,070.30	968.5	
6/21/2009	9	1,073.20	971	
6/22/2009	9	1,070.40	968.5	
6/23/2009	9	684.2	619.1	
6/24/2009	9	0	0	
6/25/2009	9	0	0	
6/26/2009	9	0	0	
6/27/2009	9	0	0	
6/28/2009	9	0	0	
6/29/2009	9	0	0	
6/30/2009	9	0	0	45,620.60
7/1/2009	9	0	0	
7/2/2009	9	0	0	
7/3/2009	9	0	0	
7/4/2009	9	0	0	
7/5/2009	9	0	0	
7/6/2009	9	0	0	
7/7/2009	9	0	0	
7/8/2009	9	0	0	
7/9/2009	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
7/10/2009	9	0	0	
7/11/2009	9	0	0	
7/12/2009	9	0	0	
7/13/2009	9	0	0	
7/14/2009	9	0	0	
7/15/2009	9	0	0	
7/16/2009	9	0	0	
7/17/2009	9	0	0	
7/18/2009	9	0	0	
7/19/2009	9	0	0	
7/20/2009	9	0	0	
7/21/2009	9	0	0	
7/22/2009	9	0	0	
7/23/2009	9	0	0	
7/24/2009	9	0	0	
7/25/2009	9	0	0	
7/26/2009	9	0	0	
7/27/2009	9	0	0	
7/28/2009	9	0	0	
7/29/2009	9	0	0	
7/30/2009	9	7.1	6.4	
7/31/2009	9	0	0	
8/1/2009	9	0	0	
8/2/2009	9	0	0	
8/3/2009	9	0	0	
8/4/2009	9	0	0	
8/5/2009	9	0	0	
8/6/2009	9	0	0	
8/7/2009	9	0	0	
8/8/2009	9	0	0	
8/9/2009	9	0	0	
8/10/2009	9	0	0	
8/11/2009	9	0	0	
8/12/2009	9	0	0	
8/13/2009	9	0	0	
8/14/2009	9	0	0	
8/15/2009	9	0	0	
8/16/2009	9	0	0	
8/17/2009	9	0	0	
8/18/2009	9	0	0	
8/19/2009	9	0	0	
8/20/2009	9	0	0	
8/21/2009	9	0	0	
8/22/2009	9	0	0	
8/23/2009	9	0	0	
8/24/2009	9	0	0	
8/25/2009	9	0	0	
8/26/2009	9	0	0	
8/27/2009	9	0	0	
8/28/2009	9	0	0	
8/29/2009	9	0	0	
8/30/2009	9	0	0	
8/31/2009	9	0	0	
9/1/2009	9	0	0	
9/2/2009	9	0	0	
9/3/2009	9	0	0	
9/4/2009	9	483.4	437.4	
9/5/2009	9	1,009.00	912.9	
9/6/2009	9	1,010.70	914.6	
9/7/2009	9	1,010.20	914.1	
9/8/2009	9	428.4	387.7	
9/9/2009	9	0	0	
9/10/2009	9	0	0	
9/11/2009	9	0	0	
9/12/2009	9	0	0	
9/13/2009	9	0	0	
9/14/2009	9	0	0	

# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
9/15/2009	9	0	0	
9/16/2009	9	0	0	
9/17/2009	9	0	0	
9/18/2009	9	0	0	
9/19/2009	9	0	0	
9/20/2009	9	0	0	
9/21/2009	9	0	0	
9/22/2009	9	0	0	
9/23/2009	9	0	0	
9/24/2009	9	0	0	
9/25/2009	9	0	0	
9/26/2009	9	0	0	
9/27/2009	9	0	0	
9/28/2009	9	0	0	
9/29/2009	9	0	0	
9/30/2009	9	0	0	3,948.80
10/1/2009	9	0	0	
10/2/2009	9	0	0	
10/3/2009	9	0	0	
10/4/2009	9	0	0	
10/5/2009	9	0	0	
10/6/2009	9	0	0	
10/7/2009	9	0	0	
10/8/2009	9	0	0	
10/9/2009	9	0	0	
10/10/2009	9	0	0	
10/11/2009	9	0	0	
10/12/2009	9	683.8	618.8	
10/13/2009	9	858.1	776.5	
10/14/2009	9	1,081.60	960.6	
10/15/2009	9	1,059.20	958.4	
10/16/2009	9	1,055.50	955.1	
10/17/2009	9	758	685.9	
10/18/2009	9	1,064.30	963	
10/19/2009	9	421.8	381.7	
10/20/2009	9	0	0	
10/21/2009	9	0	0	
10/22/2009	9	0	0	
10/23/2009	9	0	0	
10/24/2009	9	0	0	
10/25/2009	9	0	0	
10/26/2009	9	0	0	
10/27/2009	9	0	0	
10/28/2009	9	0	0	
10/29/2009	9	0	0	
10/30/2009	9	0	0	
10/31/2009	9	0	0	
11/1/2009	9	0	0	
11/2/2009	9	0	0	
11/3/2009	9	0	0	
11/4/2009	9	0	0	
11/5/2009	9	0	0	
11/6/2009	9	0	0	
11/7/2009	9	0	0	
11/8/2009	9	0	0	
11/9/2009	9	0	0	
11/10/2009	9	0	0	
11/11/2009	9	0	0	
11/12/2009	9	0	0	
11/13/2009	9	0	0	
11/14/2009	9	0	0	
11/15/2009	9	0	0	
11/16/2009	9	0	0	
11/17/2009	9	0	0	
11/18/2009	9	0	0	
11/19/2009	9	0	0	
11/20/2009	9	0	0	

**MDW34Z COGEN FUEL USAGE  
ALL UNITS**

date of report: 7/18/2012 11:50 AM

Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
11/21/2009	9	0	0	
11/22/2009	9	0	0	
11/23/2009	9	0	0	
11/24/2009	9	0	0	
11/25/2009	9	0	0	
11/26/2009	9	0	0	
11/27/2009	9	0	0	
11/28/2009	9	0	0	
11/29/2009	9	0	0	
11/30/2009	9	0	0	
12/1/2009	9	0	0	
12/2/2009	9	0	0	
12/3/2009	9	0	0	
12/4/2009	9	0	0	
12/5/2009	9	0	0	
12/6/2009	9	0	0	
12/7/2009	9	0	0	
12/8/2009	9	0	0	
12/9/2009	9	0	0	
12/10/2009	9	0	0	
12/11/2009	9	0	0	
12/12/2009	9	0	0	
12/13/2009	9	0	0	
12/14/2009	9	0	0	
12/15/2009	9	0	0	
12/16/2009	9	0	0	
12/17/2009	9	0	0	
12/18/2009	9	0	0	
12/19/2009	9	0	0	
12/20/2009	9	0	0	
12/21/2009	9	0	0	
12/22/2009	9	0	0	
12/23/2009	9	0	0	
12/24/2009	9	0	0	
12/25/2009	9	0	0	
12/26/2009	9	0	0	
12/27/2009	9	0	0	
12/28/2009	9	0	0	
12/29/2009	9	0	0	
12/30/2009	9	0	0	
12/31/2009	9	0	0	6,982.30
1/1/2010	9	0	0	
1/2/2010	9	0	0	
1/3/2010	9	0	0	
1/4/2010	9	0	0	
1/5/2010	9	0	0	
1/6/2010	9	0	0	
1/7/2010	9	0	0	
1/8/2010	9	0	0	
1/9/2010	9	0	0	
1/10/2010	9	0	0	
1/11/2010	9	0	0	
1/12/2010	9	0	0	
1/13/2010	9	0	0	
1/14/2010	9	0	0	
1/15/2010	9	0	0	
1/16/2010	9	0	0	
1/17/2010	9	0	0	
1/18/2010	9	0	0	
1/19/2010	9	0	0	
1/20/2010	9	0	0	
1/21/2010	9	0	0	
1/22/2010	9	0	0	
1/23/2010	9	0	0	
1/24/2010	9	0	0	
1/25/2010	9	0	0	
1/26/2010	9	0	0	



# MDW34Z COGEN FUEL USAGE ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
1/27/2010	9	0	0	
1/28/2010	9	16.1	14.3	
1/29/2010	9	0	0	
1/30/2010	9	0	0	
1/31/2010	9	0	0	
2/1/2010	9	0	0	
2/2/2010	9	0	0	
2/3/2010	9	0	0	
2/4/2010	9	0	0	
2/5/2010	9	0	0	
2/6/2010	9	0	0	
2/7/2010	9	0	0	
2/8/2010	9	0	0	
2/9/2010	9	0	0	
2/10/2010	9	0	0	
2/11/2010	9	0	0	
2/12/2010	9	0	0	
2/13/2010	9	0	0	
2/14/2010	9	0	0	
2/15/2010	9	0	0	
2/16/2010	9	0	0	
2/17/2010	9	18	16	
2/18/2010	9	5.6	5	
2/19/2010	9	0	0	
2/20/2010	9	0	0	
2/21/2010	9	0	0	
2/22/2010	9	0	0	
2/23/2010	9	0	0	
2/24/2010	9	0	0	
2/25/2010	9	0	0	
2/26/2010	9	0	0	
2/27/2010	9	0	0	
2/28/2010	9	0	0	
3/1/2010	9	0	0	
3/2/2010	9	0	0	
3/3/2010	9	0	0	
3/4/2010	9	0	0	
3/5/2010	9	0	0	
3/6/2010	9	0	0	
3/7/2010	9	0	0	
3/8/2010	9	0	0	
3/9/2010	9	0	0	
3/10/2010	9	0	0	
3/11/2010	9	0	0	
3/12/2010	9	0	0	
3/13/2010	9	0	0	
3/14/2010	9	0	0	
3/15/2010	9	0	0	
3/16/2010	9	0	0	
3/17/2010	9	0	0	
3/18/2010	9	0	0	
3/19/2010	9	0	0	
3/20/2010	9	0	0	
3/21/2010	9	0	0	
3/22/2010	9	0	0	
3/23/2010	9	0	0	
3/24/2010	9	0	0	
3/25/2010	9	0	0	
3/26/2010	9	0	0	
3/27/2010	9	0	0	
3/28/2010	9	0	0	
3/29/2010	9	0	0	
3/30/2010	9	0	0	
3/31/2010	9	0	0	39.70
4/1/2010	9	0	0	
4/2/2010	9	0	0	
4/3/2010	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
4/4/2010	9	0	0	
4/5/2010	9	0	0	
4/6/2010	9	0	0	
4/7/2010	9	0	0	
4/8/2010	9	0	0	
4/9/2010	9	0	0	
4/10/2010	9	0	0	
4/11/2010	9	0	0	
4/12/2010	9	0	0	
4/13/2010	9	0	0	
4/14/2010	9	0	0	
4/15/2010	9	0	0	
4/16/2010	9	0	0	
4/17/2010	9	0	0	
4/18/2010	9	0	0	
4/19/2010	9	0	0	
4/20/2010	9	0	0	
4/21/2010	9	0	0	
4/22/2010	9	0	0	
4/23/2010	9	0	0	
4/24/2010	9	0	0	
4/25/2010	9	0	0	
4/26/2010	9	0	0	
4/27/2010	9	0	0	
4/28/2010	9	0	0	
4/29/2010	9	0	0	
4/30/2010	9	0	0	
5/1/2010	9	0	0	
5/2/2010	9	0	0	
5/3/2010	9	0	0	
5/4/2010	9	0	0	
5/5/2010	9	0	0	
5/6/2010	9	0	0	
5/7/2010	9	0	0	
5/8/2010	9	0	0	
5/9/2010	9	0	0	
5/10/2010	9	0	0	
5/11/2010	9	0	0	
5/12/2010	9	0	0	
5/13/2010	9	0	0	
5/14/2010	9	0	0	
5/15/2010	9	0	0	
5/16/2010	9	0	0	
5/17/2010	9	0	0	
5/18/2010	9	0	0	
5/19/2010	9	0	0	
5/20/2010	9	0	0	
5/21/2010	9	0	0	
5/22/2010	9	0	0	
5/23/2010	9	0	0	
5/24/2010	9	0	0	
5/25/2010	9	0	0	
5/26/2010	9	0	0	
5/27/2010	9	0	0	
5/28/2010	9	0	0	
5/29/2010	9	0	0	
5/30/2010	9	0	0	
5/31/2010	9	0	0	
6/1/2010	9	0	0	
6/2/2010	9	0	0	
6/3/2010	9	0	0	
6/4/2010	9	0	0	
6/5/2010	9	0	0	
6/6/2010	9	0	0	
6/7/2010	9	0	0	
6/8/2010	9	0	0	
6/9/2010	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
6/10/2010	9	0	0	
6/11/2010	9	0	0	
6/12/2010	9	0	0	
6/13/2010	9	0	0	
6/14/2010	9	0	0	
6/15/2010	9	0	0	
6/16/2010	9	0	0	
6/17/2010	9	0	0	
6/18/2010	9	0	0	
6/19/2010	9	0	0	
6/20/2010	9	0	0	
6/21/2010	9	0	0	
6/22/2010	9	0	0	
6/23/2010	9	0	0	
6/24/2010	9	0	0	
6/25/2010	9	0	0	
6/26/2010	9	0	0	
6/27/2010	9	0	0	
6/28/2010	9	0	0	
6/29/2010	9	0	0	
6/30/2010	9	0	0	0.00
7/1/2010	9	0	0	
7/2/2010	9	0	0	
7/3/2010	9	0	0	
7/4/2010	9	0	0	
7/5/2010	9	0	0	
7/6/2010	9	0	0	
7/7/2010	9	0	0	
7/8/2010	9	0	0	
7/9/2010	9	0	0	
7/10/2010	9	0	0	
7/11/2010	9	0	0	
7/12/2010	9	0	0	
7/13/2010	9	0	0	
7/14/2010	9	0	0	
7/15/2010	9	0	0	
7/16/2010	9	0	0	
7/17/2010	9	0	0	
7/18/2010	9	0	0	
7/19/2010	9	0	0	
7/20/2010	9	0	0	
7/21/2010	9	0	0	
7/22/2010	9	0	0	
7/23/2010	9	0	0	
7/24/2010	9	0	0	
7/25/2010	9	0	0	
7/26/2010	9	0	0	
7/27/2010	9	0	0	
7/28/2010	9	0	0	
7/29/2010	9	0	0	
7/30/2010	9	0	0	
7/31/2010	9	0	0	
8/1/2010	9	0	0	
8/2/2010	9	0	0	
8/3/2010	9	0	0	
8/4/2010	9	0	0	
8/5/2010	9	0	0	
8/6/2010	9	0	0	
8/7/2010	9	0	0	
8/8/2010	9	0	0	
8/9/2010	9	0	0	
8/10/2010	9	0	0	
8/11/2010	9	0	0	
8/12/2010	9	0	0	
8/13/2010	9	0	0	
8/14/2010	9	0	0	
8/15/2010	9	0	0	

# MDW34Z COGEN FUEL USAGE

## ALL UNITS

date of report: 7/18/2012 11:50 AM

### Daily Summary

Day	Unit #	System Fuel (MMBtu)	System Fuel (MCF)	Quarterly Total (MMBtu)
8/16/2010	9	0	0	
8/17/2010	9	0	0	
8/18/2010	9	0	0	
8/19/2010	9	0	0	
8/20/2010	9	0	0	
8/21/2010	9	0	0	
8/22/2010	9	0	0	
8/23/2010	9	0	0	
8/24/2010	9	0	0	
8/25/2010	9	0	0	
8/26/2010	9	0	0	
8/27/2010	9	0	0	
8/28/2010	9	0	0	
8/29/2010	9	0	0	
8/30/2010	9	0	0	
8/31/2010	9	0	0	
9/1/2010	9	0	0	
9/2/2010	9	0	0	
9/3/2010	9	0	0	
9/4/2010	9	0	0	
9/5/2010	9	0	0	
9/6/2010	9	0	0	
9/7/2010	9	0	0	
9/8/2010	9	0	0	
9/9/2010	9	0	0	
9/10/2010	9	0	0	
9/11/2010	9	0	0	
9/12/2010	9	0	0	
9/13/2010	9	0	0	
9/14/2010	9	0	0	
9/15/2010	9	0	0	
9/16/2010	9	0	0	
9/17/2010	9	0	0	
9/18/2010	9	0	0	
9/19/2010	9	0	0	
9/20/2010	9	0	0	
9/21/2010	9	0	0	
9/22/2010	9	0	0	
9/23/2010	9	0	0	
9/24/2010	9	0	0	
9/25/2010	9	0	0	
9/26/2010	9	0	0	
9/27/2010	9	0	0	
9/28/2010	9	0	0	
9/29/2010	9	0	0	
9/30/2010	9	0	0	

0.00 Baseline Period 10/01/2008 to 9/30/2010

## **Appendix E**

### **Summary of GTE Source Test Results during Baseline Period**

Company: CHEVRON U S A INC

Test Date: 05/13/2008 Pass  Fail

Permit#: S-1129-53-10 FacilityID: 1129 Unit ID: DEU CG-7 (North Midway)

Witnessed By: Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC. Project Number: 104-5997

Next Test: 5/24/2012 Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine Input Rate: Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Strm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas F-Factor: BTU: BTU/cf Fuel Rate: MSCFD  
 Second Fuel: O2 % Stack: Stack Flow: Process Rate:

**Comments:**

WATER RATE, TEST - 3.1 GPM, LOW 2.9, HIGH - 3.7

Enforcement Action:  NOV#:

Report Rec: 06/26/2008

Reviewed By: LAFOREG

Results Sent Date: 07/02/2008

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	4.0	41.0	15		N. MIDWAY CG-7
NOx	ppm	31.0	35.0	15		N. MIDWAY CG-7
SO2	lb/hr	0.007	0.16			N. MIDWAY CG-7

Company: CHEVRON U S A INC

Test Date: 05/21/2009

Pass  Fail

Permit#: S-1129-53-10

FacilityID: 1129

Unit ID: DEU CG-7 (North Midway)

Witnessed By:

Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-6462

Next Test: 5/24/2012

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine

Input Rate:

Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Stm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas

F-Factor:

BTU: BTU/cf

Fuel Rate: MSCFD

Second Fuel:

O2 % Stack:

Stack Flow:

Process Rate:

**Comments:**

CG-7, WATER INJ RATE TESTT - 2.9 GPM, LOW - 2.5, HIGH - 3.4

Enforcement Action:

NOV#:

Report Rec: 07/07/2009

Reviewed By: HAULMAA

Results Sent Date: 07/20/2009

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	5.3	41.0	15		N. MIDWAY CG-7
NOx	ppm	27.6	35.0	15		N. MIDWAY CG-7
SO2	lb/hr	0.006	0.16			N. MIDWAY CG-7

Company: CHEVRON U S A INC

Test Date: 05/25/2010 Pass  Fail

Permit#: S-1129-53-10 FacilityID: 1129 Unit ID: DEU CG-7 (North Midway)

Witnessed By: ROACHJ Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC. Project Number: 104-6963

Next Test: 5/24/2012 Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine Input Rate: Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Strm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas F-Factor: BTU: BTU/cf Fuel Rate: MSCFD  
 Second Fuel: O2 % Stack: Stack Flow: Process Rate:

**Comments:**

Enforcement Action:  NOV#:

Report Rec: 07/13/2010

Reviewed By: GALPENSK

Results Sent Date: 07/28/2010

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	8.0	41.0	15		CG-7 (North Midway)
NOx	ppm	27.0	35.0	15		CG-7 (North Midway)
SO2	lb/hr	0.007	0.16			CG-7 (North Midway)



S-1129-53

Chevron U.S.A., Inc.  
North Midway Field  
Turbine CG-7

Project 104-6963  
May 25, 2010

EPA Method 19  
Sulfur Emissions as SO<sub>2</sub>  
@ 68° F & 29.92 "Hg

Unit	Sulfur in Fuel Gas as H <sub>2</sub> S	Sulfur in Fuel Gas as S		Sulfur in Exhaust as SO <sub>2</sub>	
	ppm	gr/scf	gr/100scf	lb/hr	lb/MMBtu
CG-7	<1	<0.0008	<0.058	<0.007	<0.0001

Supporting Data

Unit	Fuel Gas		
	MMBtu/hr	MCF/day	Btu/cf
CG-7	45.46	989	1126



**Chevron U.S.A., Inc.**  
**Turbine CG-7**  
**Natural Gas**

Sampled by: Jesus Garcia

**Project 104-6963**  
**Laboratory ID 10-209-01**

Date Sampled: May 25, 2010  
 Date Received: May 25, 2010  
 Date Analyzed: May 25, 2010

**Fuel Gas Analysis Results**

CONSTITUENT	MOLE %	WT. %	CHONS Wt. %	
Oxygen	0.000	0.000	Carbon	72.92
Nitrogen	0.728	1.042	Hydrogen	21.99
Carbon Dioxide	2.468	5.584	Oxygen	4.05
Carbon Monoxide	0.000	0.000	Nitrogen	1.04
Hydrogen Sulfide	0.000	0.000	Sulfur	0.00
Methane	82.004	67.447	H/C	0.302
Ethane	11.150	17.188	H <sub>2</sub> S ppmv	H <sub>2</sub> S gr/100 SCF*
Propane	3.098	6.999	ND < 1	ND < 0.06
Isobutane	0.163	0.486	TRs ppmv	TRs gr/100 SCF*
N-Butane	0.272	0.811	ND < 1	ND < 0.06
Isopentane	0.040	0.148		
N-Pentane	0.072	0.267		
Hexanes	0.011	0.047		
Total(s)	100.000	100.000	* Reported as Sulfur	

Specific Gravity (Air = 1)	0.6735
Specific Volume (cf/lb)	19.46
Gross Calorific Value, Dry (Btu/cf)	1125.90
Gross Calorific Value, Wet (Btu/cf)	1103.07
Gross Calorific Value, Dry (Btu/lb)	21908.26
Net Calorific Value, Dry (Btu/cf)	1018.58
Net Calorific Value, Wet (Btu/cf)	997.90
Compressibility Factor "Z" @ 60° F, 1 atm	0.9971

EPA F-Factor @ 68° F (DSCF/MMBtu)	8669
EPA F-Factor @ 60° F (DSCF/MMBtu)	8539

**References:**

ASTM Methods D1945-03, D3588-98 (2003), D8228-98 (2003)  
 Double GC, TCD, FPD  
 TRS = Total Reduced Sulfur as H<sub>2</sub>S

*Lisa Marriott-Smith*  
 Lisa Marriott-Smith, Laboratory Manager

**"Professional Air Emissions Testing and Analytical Services"**

18828 Highway 66 • Bakersfield, CA 93308  
 (661) 391-0112 • (661) 391-0163 Fax

Company: CHEVRON U S A INC

Test Date: 05/13/2008 Pass  Fail

Permit#: S-1129-54-11 FacilityID: 1129 Unit ID: DEU CG-8 (North Midway)

Witnessed By: Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-5997

Next Test: 5/24/2011

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW GAS FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine

Input Rate:

Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Stm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas

F-Factor:

BTU: BTU/cf

Fuel Rate: MSCFD

Second Fuel:

O2 % Stack:

Stack Flow:

Process Rate:

**Comments:**

WATER INJ RATE TEST - 2.7 GPM, LOW - 2.3 GPM, HIGH - 3.6 GPM

Enforcement Action:  NOV#:

Report Rec: 06/26/2008

Reviewed By: LAFOREG

Results Sent Date: 07/02/2008

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	5.1	41.0	15		N. MIDWAY CG-8
NOx	ppm	28.1	35.0	15		N. MIDWAY CG-8
SO2	lb/hr	0.007	0.16			N. MIDWAY CG-8

Company: CHEVRON U S A INC

Test Date: 05/20/2009 Pass  Fail

Permit#: S-1129-54-11 FacilityID: 1129 Unit ID: DEU CG-8 (North Midway)

Witnessed By: Area Inspector: John Roach

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-6462

Next Test: 5/24/2011

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW GAS FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine Input Rate: Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Stm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas F-Factor: BTU: BTU/cf Fuel Rate: MSCFD  
 Second Fuel: O2 % Stack: Stack Flow: Process Rate:

**Comments:**

CG-8, WATER INJ RATE TEST - 3.2 GPM, LOW 2.8, HIGH -3.8

Enforcement Action:  NOV#:

Report Rec: 07/07/2009

Reviewed By: HAULMAA

Results Sent Date: 07/20/2009

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	4.5	41.0	15		N. MIDWAY CG-8
NOx	ppm	28.3	35.0	15		N. MIDWAY CG-8
SO2	lb/hr	0.007	0.16			N. MIDWAY CG-8

Company: CHEVRON U S A INC

Test Date: 05/26/2010 Pass  Fail

Permit#: S-1129-54-11 FacilityID: 1129 Unit ID: DEU CG-8 (North Midway)

Witnessed By: HOLMESD Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-6963

Next Test: 5/24/2011

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW GAS FIRED TURBINE COGEN W/ WATER INJECTION

Equipment Type: Gas Turbine

Input Rate:

Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Strm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas F-Factor: BTU: BTU/cf Fuel Rate: MSCFD  
 Second Fuel: O2 % Stack: Stack Flow: Process Rate:

**Comments:**

Enforcement Action:  NOV#:

Report Rec: 07/13/2010

Reviewed By: GALPENSK

Results Sent Date: 07/28/2010

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	7.3	41.0	15		CG-8 (North Midway)
NOx	ppm	21.4	35.0	15		CG-8 (North Midway)
SO2	lb/hr	0.007	0.16			CG-8 (North Midway)

S-1129-54

Chevron U.S.A., Inc.  
North Midway Field  
Turbine CG-8

Project 104-6963  
May 26, 2010

EPA Method 19  
Sulfur Emissions as SO<sub>2</sub>  
@ 68° F & 29.92 "Hg

Unit	Sulfur in Fuel Gas as H <sub>2</sub> S	Sulfur in Fuel Gas as S		Sulfur in Exhaust as SO <sub>2</sub>	
	ppm	gr/scf	gr/100scf	lb/hr	lb/MMBtu
CG-8	<1	<0.0006	<0.058	<0.007	<0.0007

Supporting Data

Unit	Fuel Gas		
	MMBtu/hr	MCF/day	Btu/cf
CG-8	44.64	980	1116



**Chevron U.S.A., Inc.**  
**Turbine CG-8**  
**Natural Gas**

Sampled by: Raul Corona

**Project 104-6963**  
**Laboratory ID 10-209-05**

Date Sampled: May 26, 2010  
 Date Received: May 27, 2010  
 Date Analyzed: May 27, 2010

**Fuel Gas Analysis Results**

CONSTITUENT	MOLE %	WT. %	CHONS WT. %	
Oxygen	0.000	0.000	Carbon	72.56
Nitrogen	1.158	1.874	Hydrogen	21.99
Carbon Dioxide	2.285	5.180	Oxygen	3.77
Carbon Monoxide	0.000	0.000	Nitrogen	1.87
Hydrogen Sulfide	0.000	0.000	Sulfur	0.00
Methane	82.593	68.391	H/C	0.303
Ethane	10.394	16.131		
Propane	3.003	6.835	H <sub>2</sub> S ppmv	H <sub>2</sub> S gr/100 SCF*
Isobutane	0.187	0.560	ND < 1	ND < 0.06
N-Butane	0.291	0.872		
Isopentane	0.048	0.178	TRS ppmv	TRS gr/100 SCF*
N-Pentane	0.031	0.116	ND < 1	ND < 0.06
Hexanes	0.012	0.054		
<b>Total(s)</b>	<b>100.000</b>	<b>100.000</b>	* Reported as Sulfur	

Specific Gravity (Air = 1)	0.6889
Specific Volume (cf/lb)	19.59
Gross Calorific Value, Dry (Btu/cf)	1116.12
Gross Calorific Value, Wet (Btu/cf)	1093.55
Gross Calorific Value, Dry (Btu/lb)	21863.02
Net Calorific Value, Dry (Btu/cf)	1009.51
Net Calorific Value, Wet (Btu/cf)	989.10
Compressibility Factor "Z" @ 60° F, 1 atm	0.9972
EPA F-Factor @ 68° F (DSCF/MMBtu)	8670
EPA F-Factor @ 60° F (DSCF/MMBtu)	8540

**References:**

ASTM Methods D1945-03, D3588-98 (2003), D6228-98 (2003)  
 Double GC, TCD, FPD  
 TRS = Total Reduced Sulfur as H<sub>2</sub>S

*Lisa Marriott-Smith*  
 Lisa Marriott-Smith, Laboratory Manager

**"Professional Air Emissions Testing and Analytical Services"**

18928 Highway 65 • Bakersfield, CA 93308  
 (861) 391-0112 • (861) 391-0153 Fax

Company: CHEVRON U S A INC

Test Date: 05/13/2008

Pass  Fail

Permit#: S-1129-55-10

FacilityID: 1129

Unit ID: N. MIDWAY CG-9

Witnessed By:

Area Inspector: ROACHJ

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-5997

Next Test:

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION NORTH MIDWAY UNIT #9

Equipment Type: Gas Turbine

Input Rate:

Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Stm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: Nat. Gas

F-Factor: 8667

BTU: 1111.0 BTU

Fuel Rate: 955.0 MCFD

Second Fuel:

O2 % Stack: 15.6

Stack Flow: 25088

Process Rate:

**Comments:**

WATER INJ RATE TEST - 2.8 GHPM, LOW - 2.5 GPM, HIGH - 3.4 GPM

Enforcement Action:

NOV#:

Report Rec: 06/26/2008

Reviewed By: LAFOREG

Results Sent Date: 07/02/2008

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	3.4	41.0	15		Turbines CG-9
NOx	ppm	29.5	35.0	15		Turbines CG-9
SO2	lb/hr	0.007	0.16			Turbines CG-9



Company: CHEVRON U S A INC

Test Date: 05/20/2009

Pass  Fail

Permit#: S-1129-55-10

FacilityID: 1129

Unit ID: DEU - CG-9 (North Midway)

Witnessed By:

Area inspector: John Roach

**Reason For Testing:**

Annual  Initial  CGA  RATA  Stationary/RATA  QTR:  
 ReTest  RepTest  AMS  Dist Performed  Unit Dormant   
 Postponed

Test Company: AEROS ENVIRONMENTAL INC.

Project Number: 104-6462

Next Test: 5/24/2011

Test Company Contact: Mr. Mike Gray

Equipment: 3.5 MW gas-fired cogeneration turbine with H2O injection

Equipment Type: Gas Turbine

Input Rate:

Output Rate: 3.5 MW

**Control Equipment:**

Catalyst  Scrubber  Baghouse  FGR  O2   
 LoNOx  Incin  ESP  H2O/Stm Inj  NH3/SCR   
 DLN  PSC  PCC  Rich Burn  Lean Burn   
 Cyclone  TEOR-Gas

**Fuel Data And Operational Data:**

Fuel Type: PUC Gas

F-Factor: 8662

BTU: 1115.0 BTU/cf

Fuel Rate: 966.0 MSCFD

Second Fuel:

O2 % Stack: 15.1

Stack Flow: 23347

Process Rate:

**Comments:**

CG-9, WATER INJ RATE TEST - 3.3 GPM, LOW - 2.9, HIGH - 3.8

Enforcement Action:

NOV#:

Report Rec: 07/07/2009

Reviewed By: HAULMAA

Results Sent Date: 07/20/2009

**Test Results:**

Pollutant	Unit	Result	Limit	O2 Correction	Failed	Unit ID
CO	ppm	3.6	41.0	15		N. MIDWAY CG-9
NOx	ppm	26.0	35.0	15		N. MIDWAY CG-9
SO2	lb/hr	0.007	0.16			N. MIDWAY CG-9

## **Appendix F**

**AP-42, Chapter 3, Section 3.1, Table 3.1-2a**

Table 3.1-2a. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM STATIONARY GAS TURBINES

Emission Factors <sup>a</sup> - Uncontrolled				
Pollutant	Natural Gas-Fired Turbines <sup>b</sup>		Distillate Oil-Fired Turbines <sup>d</sup>	
	(lb/MMBtu) <sup>c</sup> (Fuel Input)	Emission Factor Rating	(lb/MMBtu) <sup>e</sup> (Fuel Input)	Emission Factor Rating
CO <sub>2</sub> <sup>f</sup>	110	A	157	A
N <sub>2</sub> O	0.003 <sup>g</sup>	E	ND	NA
Lead	ND	NA	1.4 E-05	C
SO <sub>2</sub>	0.94S <sup>h</sup>	B	1.01S <sup>h</sup>	B
Methane	8.6 E-03	C	ND	NA
VOC	2.1 E-03	D	4.1 E-04 <sup>i</sup>	E
TOC <sup>k</sup>	1.1 E-02	B	4.0 E-03 <sup>l</sup>	C
PM (condensable)	4.7 E-03 <sup>l</sup>	C	7.2 E-03 <sup>l</sup>	C
PM (filterable)	1.9 E-03 <sup>l</sup>	C	4.3 E-03 <sup>l</sup>	C
PM (total)	6.6 E-03 <sup>l</sup>	C	1.2 E-02 <sup>l</sup>	C

<sup>a</sup> Factors are derived from units operating at high loads ( $\geq 80$  percent load) only. For information on units operating at other loads, consult the background report for this chapter (Reference 16), available at "www.epa.gov/ttn/chief". ND = No Data, NA = Not Applicable.

<sup>b</sup> SCCs for natural gas-fired turbines include 2-01-002-01, 2-02-002-01 & 03, and 2-03-002-02 & 03.

<sup>c</sup> Emission factors based on an average natural gas heating value (HHV) of 1020 Btu/scf at 60°F. To convert from (lb/MMBtu) to (lb/10<sup>6</sup> scf), multiply by 1020. Similarly, these emission factors can be converted to other natural gas heating values.

<sup>d</sup> SCCs for distillate oil-fired turbines are 2-01-001-01, 2-02-001-01, 2-02-001-03, and 2-03-001-02.

<sup>e</sup> Emission factors based on an average distillate oil heating value of 139 MMBtu/10<sup>3</sup> gallons. To convert from (lb/MMBtu) to (lb/10<sup>3</sup> gallons), multiply by 139.

<sup>f</sup> Based on 99.5% conversion of fuel carbon to CO<sub>2</sub> for natural gas and 99% conversion of fuel carbon to CO<sub>2</sub> for distillate oil. CO<sub>2</sub> (Natural Gas) [lb/MMBtu] = (0.0036 scf/Btu)(%CON)(C)(D), where %CON = weight percent conversion of fuel carbon to CO<sub>2</sub>, C = carbon content of fuel by weight, and D = density of fuel. For natural gas, C is assumed at 75%, and D is assumed at 4.1 E+04 lb/10<sup>6</sup>scf. For distillate oil, CO<sub>2</sub> (Distillate Oil) [lb/MMBtu] = (26.4 gal/MMBtu) (%CON)(C)(D), where C is assumed at 87%, and the D is assumed at 6.9 lb/gallon.

<sup>g</sup> Emission factor is carried over from the previous revision to AP-42 (Supplement B, October 1996) and is based on limited source tests on a single turbine with water-steam injection (Reference 5).

<sup>h</sup> All sulfur in the fuel is assumed to be converted to SO<sub>2</sub>. S = percent sulfur in fuel. Example, if sulfur content in the fuel is 3.4 percent, then S = 3.4. If S is not available, use 3.4 E-03 lb/MMBtu for natural gas turbines, and 3.3 E-02 lb/MMBtu for distillate oil turbines (the equations are more accurate).

<sup>i</sup> VOC emissions are assumed equal to the sum of organic emissions.

<sup>k</sup> Pollutant referenced as THC in the gathered emission tests. It is assumed as TOC, because it is based on EPA Test Method 25A.

<sup>l</sup> Emission factors are based on combustion turbines using water-steam injection.

## **Appendix G**

### **Calculation Spreadsheet of Historical Actual Emissions and Bankable Emissions**

**S-1129-53 CG-7**

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	52481
2 <sup>nd</sup> Quarter	37556
3 <sup>rd</sup> Quarter	46986
4 <sup>th</sup> Quarter	67716

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0021	0.0184	0.013	0.0066	0.0001	0.05307
2 <sup>nd</sup> Quarter	0.0021	0.0184	0.013	0.0066	0.0001	0.05307
3 <sup>rd</sup> Quarter	0.0021	0.0184	0.013	0.0066	0.0001	0.05307
4 <sup>th</sup> Quarter	0.0021	0.0184	0.013	0.0066	0.0001	0.05307

**Actual Emisissions**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	110	966	682	346	5	2785
2 <sup>nd</sup> Quarter	79	691	488	248	4	1993
3 <sup>rd</sup> Quarter	99	865	611	310	5	2494
4 <sup>th</sup> Quarter	142	1246	880	447	7	3594
MT/year						10,865

**AQID**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	11	97	68	35	1
2 <sup>nd</sup> Quarter	8	69	49	25	0
3 <sup>rd</sup> Quarter	10	86	61	31	0
4 <sup>th</sup> Quarter	14	125	88	45	1

**Bankable Criteria Emission Reduction Credits**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	99	869	614	312	5
2 <sup>nd</sup> Quarter	71	622	439	223	3
3 <sup>rd</sup> Quarter	89	778	550	279	4
4 <sup>th</sup> Quarter	128	1121	792	402	6

**S-1129-54 CG-8**

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	57208
2 <sup>nd</sup> Quarter	79569
3 <sup>rd</sup> Quarter	92368
4 <sup>th</sup> Quarter	93208

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0021	0.0184	0.0126	0.0066	0.0001	0.05307
2 <sup>nd</sup> Quarter	0.0021	0.0184	0.0126	0.0066	0.0001	0.05307
3 <sup>rd</sup> Quarter	0.0021	0.0184	0.0126	0.0066	0.0001	0.05307
4 <sup>th</sup> Quarter	0.0021	0.0184	0.0126	0.0066	0.0001	0.05307

**Actual Emisissions**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	120	1053	721	378	6	3036
2 <sup>nd</sup> Quarter	167	1464	1003	525	8	4223
3 <sup>rd</sup> Quarter	194	1700	1164	610	9	4902
4 <sup>th</sup> Quarter	196	1715	1174	615	9	4947
MT/year						17,107

**AQID**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	12	105	72	38	1
2 <sup>nd</sup> Quarter	17	146	100	53	1
3 <sup>rd</sup> Quarter	19	170	116	61	1
4 <sup>th</sup> Quarter	20	172	117	62	1

**Bankable Criteria Emission Reduction Credits**

	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	108	947	649	340	5
2 <sup>nd</sup> Quarter	150	1318	902	473	7
3 <sup>rd</sup> Quarter	175	1530	1047	549	8
4 <sup>th</sup> Quarter	176	1544	1057	554	8

**S-1129-55 CG-9**

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	10068
2 <sup>nd</sup> Quarter	22810
3 <sup>rd</sup> Quarter	1974
4 <sup>th</sup> Quarter	8602

	VOC	NOx	CO	PM10	SOx	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0021	0.0184	0.0078	0.0066	0.0001	0.05307
2 <sup>nd</sup> Quarter	0.0021	0.0184	0.0078	0.0066	0.0001	0.05307
3 <sup>rd</sup> Quarter	0.0021	0.0184	0.0078	0.0066	0.0001	0.05307
4 <sup>th</sup> Quarter	0.0021	0.0184	0.0078	0.0066	0.0001	0.05307

**Actual Emisions**

	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	21	185	79	66	1	534
2 <sup>nd</sup> Quarter	48	420	178	151	2	1211
3 <sup>rd</sup> Quarter	4	36	15	13	0	105
4 <sup>th</sup> Quarter	18	158	67	57	1	457
MT/year						2,306

**AQID**

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	2	19	8	7	0
2 <sup>nd</sup> Quarter	5	42	18	15	0
3 <sup>rd</sup> Quarter	0	4	2	1	0
4 <sup>th</sup> Quarter	2	16	7	6	0

**Bankable Criteria Emission Reduction Credits**

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	19	167	71	60	1
2 <sup>nd</sup> Quarter	43	378	160	135	2
3 <sup>rd</sup> Quarter	4	33	14	12	0
4 <sup>th</sup> Quarter	16	142	60	51	1

Total AER						
	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	251	2204	1482	790	12	
2 <sup>nd</sup> Quarter	294	2575	1669	924	14	
3 <sup>rd</sup> Quarter	297	2600	1790	933	14	
4 <sup>th</sup> Quarter	356	3119	2122	1119	17	

Total AQID						
	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	25	220	148	79	1	
2 <sup>nd</sup> Quarter	29	257	167	92	1	
3 <sup>rd</sup> Quarter	30	260	179	93	1	
4 <sup>th</sup> Quarter	36	312	212	112	2	

Total Bankable Emission Reduction Credits						
	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	226	1983	1333	711	11	
2 <sup>nd</sup> Quarter	264	2317	1502	831	13	
3 <sup>rd</sup> Quarter	267	2340	1611	839	13	
4 <sup>th</sup> Quarter	320	2807	1910	1007	15	
MT/year						30,279



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**NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to Chevron USA, Inc. for the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCS proposed for banking is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

The analysis of the regulatory basis for this proposed action, Project #S-1122845, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and at any District office. For additional information, please contact the District at (661) 392-5500. Written comments on this project must be submitted by July 2, 2014 to ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308. 6/2/14 CNS-2628634#

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Email **FINAL** Public Notice package to EPA

Email **FINAL** Public Notice package to CARB

Email **FINAL** Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"

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facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below):

lance.ericksen@Chevron.com

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NN/AE or  FPNP Name/address: none

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Song  
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST  
1990 E. GETTYSBURG AVE.  
FRESNO, CA 93726

CNS 2646015

### COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE  
Ad Description: Final ERC S-1122845, Chevron, Bakersfield

To the right is a copy of the notice you sent to us for publication in the THE BAKERSFIELD CALIFORNIAN. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

07/21/2014

#### Daily Journal Corporation

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BUSINESS JOURNAL, RIVERSIDE	(951) 784-0111
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ORANGE COUNTY REPORTER, SANTA ANA	(714) 543-2027
SAN DIEGO COMMERCE, SAN DIEGO	(619) 232-3486
SAN FRANCISCO DAILY JOURNAL, SAN FRANCISCO	(800) 640-4829
SAN JOSE POST-RECORD, SAN JOSE	(408) 287-4866
THE DAILY RECORDER, SACRAMENTO	(916) 444-2355
THE INTER-CITY EXPRESS, OAKLAND	(510) 272-4747

#### NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1122845 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500. 7/21/14  
CNS-2646015#  
THE BAKERSFIELD CALIFORNIAN



\* A 0 0 0 0 0 3 4 8 6 2 4 3 \*

## Song Thao

---

**From:** Song Thao  
**Sent:** Wednesday, July 16, 2014 1:40 PM  
**To:** Gerardo Rios (SJV\_T5\_Permits@epa.gov.); Mike Tollstrup (mtollstr@arb.ca.gov)  
**Subject:** Final ERC Public Notice for Chevron USA Inc. Facility S-1129 Project S-1122845  
**Attachments:** Final S-1122845.PDF; Newspaper.PDF

**Importance:** High

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by The shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

## Song Thao

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**From:** Microsoft Outlook  
**To:** Gerardo Rios (SJV\_T5\_Permits@epa.gov.)  
**Sent:** Wednesday, July 16, 2014 1:40 PM  
**Subject:** Relayed: Final ERC Public Notice for Chevron USA Inc. Facility S-1129 Project S-1122845

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

Gerardo Rios (SJV\_T5\_Permits@epa.gov.) (SJV\_T5\_Permits@epamail.epa.gov)

Subject: Final ERC Public Notice for Chevron USA Inc. Facility S-1129 Project S-1122845

## Song Thao

---

**From:** Song Thao  
**Sent:** Wednesday, July 16, 2014 1:40 PM  
**To:** WebTeam  
**Subject:** valleyair.org update: Final ERC Public Notice for Chevron USA Inc. Facility S-1129 Project S-1122845  
**Attachments:** Final S-1122845.PDF; Newspaper.PDF; Aviso.PDF

July 16, 2014 (Facility S-1129 Project S-1122845) NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by The shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

[Newspaper Notice](#)

[Aviso](#)

[Public Notice Package](#)

## Song Thao

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**From:** Song Thao  
**Sent:** Thursday, July 17, 2014 10:18 AM  
**To:** All Region (Notices\_of\_Permitting\_Actions-All\_Regions@lists.valleyair.org); South (Notices\_of\_Permitting\_Actions-Southern\_Region@lists.valleyair.org)  
**Subject:** Public Notice on Permitting Action S-1122845

The District has posted a new permitting public notice. The public notice can be viewed on our website at: [http://www.valleyair.org/notices/Docs/2014/07-16-14\\_\(S-1122845\)/Newspaper.pdf](http://www.valleyair.org/notices/Docs/2014/07-16-14_(S-1122845)/Newspaper.pdf)

For a list of public notices and public notice packages, please visit our website at: [http://www.valleyair.org/notices/public\\_notices\\_idx.htm#PermittingandEmissionReductionCreditCertificateNotices](http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices)

Thank you.



## Song Thao

---

**From:** Song Thao  
**Sent:** Thursday, July 17, 2014 10:19 AM  
**To:** All Spanish (Avisos\_Sobre\_Acciones\_de\_Permisos-Todos@lists02.valleyair.org)  
**Subject:** Aviso Publico Sobre Acciones de Permisos S-1141623 & S-1141607

El Distrito del Aire a publicado un nuevo aviso público de permiso. El aviso público se puede ver en nuestro sitio de web en: [http://www.valleyair.org/notices/Docs/2014/07-16-14\\_\(S-1141623\)/Aviso.pdf](http://www.valleyair.org/notices/Docs/2014/07-16-14_(S-1141623)/Aviso.pdf)

Para obtener una lista de avisos públicos y paquetes de avisos públicos, por favor visite nuestro sitio de web en: [http://www.valleyair.org/notices/public\\_notices\\_idx.htm#PermittingandEmissionReductionCreditCertificateNotices](http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices)

Gracias

**AVISO DE DECISIÓN FINAL  
PARA LA OTORGACIÓN DE  
CERTIFICADOS DE REDUCCIÓN DE EMISIONES**

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a Chevron USA, Inc. por la reducción de emisiones generadas por al cerrar tres turbinas de gas en la fuente de producción de petróleo pesado de North Midway Cogeneration al oeste del Condado de Kern. La cantidad de ERCs que serán emitidos son 9,447 libras/año de NOx, 51 libras/año de SOx, 3,388 libras/año de PM10, 6,356 libras/año de CO, 1,077 libras/año de VOC y 30,279 toneladas métricas/año de CO2e.

No se recibieron comentarios acerca de este proyecto despues del aviso de decision preliminar del Distrito.

La revisión de la solicitud del Proyecto #S-1122845 está disponible para la inspección del público en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUIN, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500.

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by The shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1122845 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.



JUL 16 2014

Gregory Pritchett  
Chevron USA, Inc.  
PO Box 1392  
Bakersfield, CA 93302

**RE: Notice of Final Action – Emission Reduction Credits**  
**Facility Number: S-1129**  
**Project Number: S-1122845**

Dear Mr. Pritchett:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by The shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

Enclosed are the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificates was published on June 2, 2014. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on May 28, 2014. No comments were received following the District's preliminary decision on this project.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

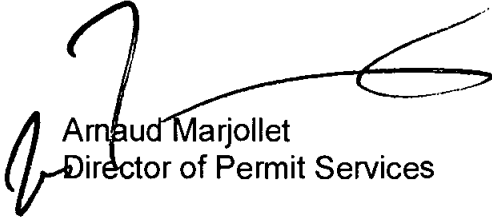
**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

Mr. Gregory Pritchett  
Page 2

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

AM:SPL/st

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email



Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

# Emission Reduction Credit Certificate

## S-4304-1

ISSUED TO: CHEVRON U S A INC  
 ISSUED DATE: July 14, 2014  
 LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
 SECTION: 34 TOWNSHIP: 30S RANGE: 22E

### For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
226 lbs	264 lbs	267 lbs	320 lbs

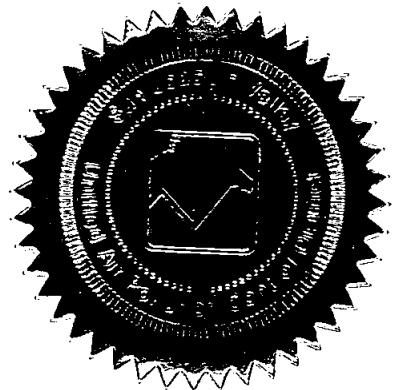
Conditions Attached

Method Of Reduction

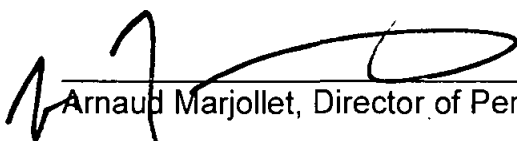
- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services



Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

## Emission Reduction Credit Certificate S-4304-2

ISSUED TO: CHEVRON U S A INC  
 ISSUED DATE: July 14, 2014  
 LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
 SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For NOx Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,983 lbs	2,317 lbs	2,340 lbs	2,807 lbs

Conditions Attached

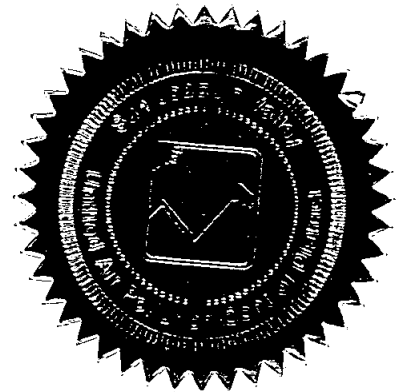
**Method Of Reduction**

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO



  
Arnaud Marjollet, Director of Permit Services



Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

## Emission Reduction Credit Certificate S-4304-3

ISSUED TO: CHEVRON U S A INC  
 ISSUED DATE: July 14, 2014  
 LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
 SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For CO Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,333 lbs	1,574 lbs	1,590 lbs	1,907 lbs

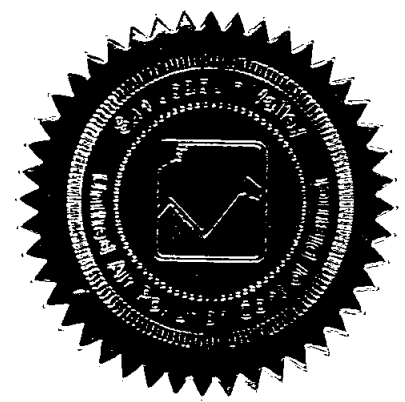
Conditions Attached

**Method Of Reduction**

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Sayed Sadredin, Executive Director / APCO

  
 \_\_\_\_\_  
 Arnaud Marjollet, Director of Permit Services



Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

# Emission Reduction Credit Certificate

## S-4304-4

ISSUED TO: CHEVRON U S A INC  
 ISSUED DATE: July 14, 2014  
 LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
 SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For PM10 Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
711 lbs	831 lbs	839 lbs	1,007 lbs

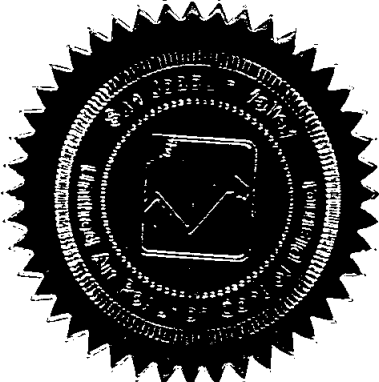
Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services





Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

## Emission Reduction Credit Certificate S-4304-5

ISSUED TO: CHEVRON U S A INC  
 ISSUED DATE: July 14, 2014  
 LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
 SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For SOx Reduction In The Amount Of:**

Quarter 1	Quarter 2	Quarter 3	Quarter 4
11 lbs	13 lbs	13 lbs	15 lbs

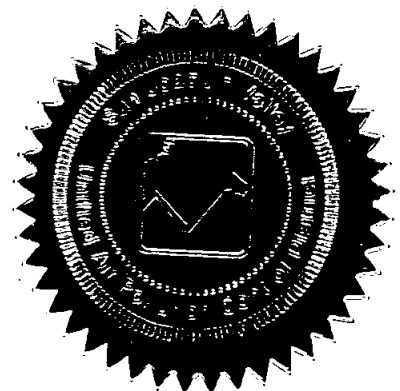
Conditions Attached

**Method Of Reduction**

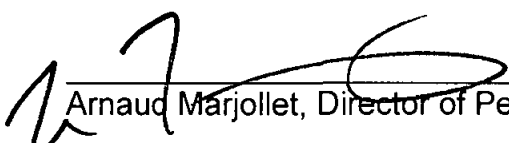
- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.



Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjolle, Director of Permit Services



Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

# Emission Reduction Credit Certificate

## S-4304-24

ISSUED TO: CHEVRON U S A INC  
ISSUED DATE: July 14, 2014  
LOCATION OF REDUCTION: HEAVY OIL WESTERN CA  
SECTION: 34 TOWNSHIP: 30S RANGE: 22E

**For CO2E Reduction In The Amount Of:**

30,279 metric tons / year

Conditions Attached

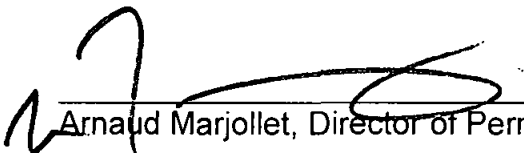
**Method Of Reduction**

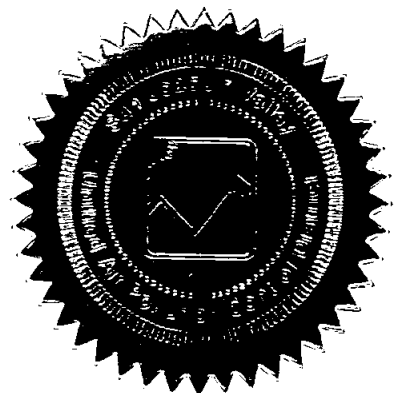
- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Shutdown of gas turbines S-1129-53, '-54, and '-55

**Emission Reduction Qualification Criteria**

Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services



Bakersfield Californian

Newspaper notice for publication in Bakersfield Californian and for posting on  
valleyair.org

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**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by The shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO<sub>2</sub>e/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1122845 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.

**AVISO DE DECISIÓN FINAL  
PARA LA OTORGACIÓN DE  
CERTIFICADOS DE REDUCCIÓN DE EMISIONES**

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a Chevron USA, Inc. por la reducción de emisiones generadas por al cerrar tres turbinas de gas en la fuente de producción de petróleo pesado de North Midway Cogeneration al oeste del Condado de Kern. La cantidad de ERCs que serán emitidos son 9,447 libras/año de NOx, 51 libras/año de SOx, 3,388 libras/año de PM10, 6,356 libras/año de CO, 1,077 libras/año de VOC y 30,279 toneladas métricas/año de CO2e.

No se recibieron comentarios acerca de este proyecto despues del aviso de decision preliminar del Distrito.

La revisión de la solicitud del Proyecto #S-1122845 está disponible para la inspección del público en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUIN, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500.

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF  
EMISSION REDUCTION CREDITS**

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No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1122845 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**JUL 21 2014**

Chevron USA, Inc.  
Attn: Lance Ericksen  
PO Box 1392  
Bakersfield, CA 93302

**RE: Emission Reduction Credits – Final Invoice**  
**Project Number S-1122845**

Dear Mr. Ericksen:

The District has issued the Emission Reduction Credits (ERC's) for the above referenced project. The certificates that represent those ERC's will arrive under separate cover.

Enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice within 60 days.

Thank you for your cooperation in this matter. If you have any questions please contact Leonard Scandura at (661) 392-5500.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

Leonard Scandura, PE  
Permit Services Manager

AM: spl

Enclosure

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# Telephone Conversation

**With:** Dan Weller, ARB  
**APCD Rep:** Stephen Leonard, Sr. AQE  
**Date/Time:** June 16, 11:36 AM  
**Project #:** S1122845  
**Re:** Chevron ERC Project

---

Mr. Weller called to announce that the California Air Resources Board had no comments on the Chevron ERC Banking Project S-1129; 1122845.

## Homero Ramirez

---

**From:** Song Thao  
**Sent:** Tuesday, May 27, 2014 3:21 PM  
**To:** Homero Ramirez; OA-PublicNotices  
**Cc:** Steve Leonard; Leonard Scandura  
**Subject:** RE: Public Notice - Preliminary Decision for ERC Project (S-1129/S-1122845)

Rec'd and will process. Thank you.

---

**From:** Homero Ramirez  
**Sent:** Tuesday, May 27, 2014 3:02 PM  
**To:** OA-PublicNotices  
**Cc:** Steve Leonard; Leonard Scandura  
**Subject:** Public Notice - Preliminary Decision for ERC Project (S-1129/S-1122845)

Good afternoon.

On behalf of Steve Leonard (who is on vacation), attached are files for the Preliminary Decision for his Emission Reduction Credits project (S-1129/S-1122845) for processing and for Arnaud's signature. The Evaluation, its appendices, Preliminary Decision Letter, Newspaper Notice, District Website Notice, and a Checklist are attached.

Please let me know if you have any questions.

Thank you.

Homero Ramirez  
San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308  
Tel. (661) 392-5616  
Fax (661) 392-5585



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**Make one change for clean air!**

# ERC PROJECT ROUTING FORM

FACILITY NAME:	Chevron USA, Inc.		
FACILITY ID:	S-1129	PROJECT NUMBER:	S-1122845
ERC CERTIFICATE #S:	S-		
DATE RECEIVED:	7/19/12		

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete	SPL	8/13/2012	CF	9/17/12
Second Information Letter	SPL	1/16/2014	CF	1/17/14
B. Application Deemed Complete	SPL	4/2/14	RWK	4/3/14
120 <sup>th</sup> Day for New Reduction Projects				
C. Application Pending Denial	SPL	12/3/13	CF	12/5/13
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	SPL	5/13/14
F. Supervising Engineer Approval	AP	5-14-14
G. Permit Services Regional Manager Approval	CF	5/27/14

**DIRECTOR REVIEW:**    Not Required    Required

**PROJECTS REQUIRING PUBLIC NOTIFICATION**

**--PRELIMINARY DECISION:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date e-mailed to PSD Director.

Date of distribution to applicant, EPA, and CARB.

Date of contact with EPA regarding comments on project.

Date of contact with CARB regarding comments on project.

**--FINAL DECISION:**

\_\_\_\_\_

\_\_\_\_\_

Date e-mailed to PSD Director.

Date of distribution to applicant, EPA, and CARB.





**Gregory E. Prichett**  
Manager – Health,  
Environment, and Safety

**San Joaquin Valley BU**  
Chevron North America  
Exploration and Production  
P.O. Box 1392  
Bakersfield, CA 93302

December 19, 2013

RECEIVED  
DEC 20 2013  
SJVAPCD  
Southern Region

Mr. Leonard Scandura  
San Joaquin Valley APCD  
34946 Flyover Court  
Bakersfield, CA 93308

**RE: Response to Intent to Deny Banking Application Project <sup>S</sup> C-1122845**

Dear Mr. Scandura:

This letter is in response to the District's Intent to Deny letter dated December 5, 2013 and request for additional information letter dated August 17, 2012 for the above referenced project to bank greenhouse gas emissions from the shutdown of three gas turbine engines (GTEs) at the North Midway Lease.

Chevron U.S.A. Inc. (CUSA) does not believe that District Rules 2201 and 2301 require permanence be demonstrated beyond the boundaries of the emission unit. The qualification for banking from the shutdown of each turbine was demonstrated with the original submission and in CUSA's letter of July 19, 2012. CUSA offers the following response to clarify the status of the GTEs included in this banking project.

The Chevron's response to the information requested is as follows:

1. Specify the geographical boundary:

The GTEs were located in the North Midway oilfield. The North Midway oilfield is part of the Midway-Sunset oilfield located between Derby Acres and Fellows in southwestern Kern County. For the purposes of determining the geographic boundary of the emission reduction CUSA considers the reduction effective for the State of California. Information on how the reduction is permanent for the state of California is given below.

2. Provide and explanation of how the emission reduction is permanent within the boundary of the emission reduction project.

The reduction is permanent for the state of California.

Oil Production In California Is Declining:

California oil field production has declined over the past thirty years and is approximately half of the amount produced in the 1980's. There have been no significant new oil discoveries in California during that time and the decline is expected to continue. Documentation of the decline is included as Attachment A.

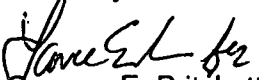
Response to Intent to Deny  
Project S-1122845  
December 19, 2013

**Greenhouse Gas Emissions Will Not Increase Statewide:**

CUSA and other companies with significant oil production are subject to the California Cap-and-Trade regulation for greenhouse gases. The regulation sets a declining cap on allowed emissions while employing market mechanisms to achieve emission reductions. In the cap-and-trade program, a limit, or cap is put on the amount of pollutants (i.e., GHGs) that can be emitted. The cap is implemented by creating allowances in a number equal to the cumulative emissions from all the covered sectors. These allowances may be auctioned, distributed for free, or allocated by some combination thereof. Sources in the capped sectors must report their emissions and must surrender allowances to match those emissions in accordance with the schedule in the regulation to achieve the reduced 2020 cap. Should oil production GHG emissions increase GHG allocations representing reductions from other covered sectors must be purchased and surrendered. Additional information on the Cap-and-Trade program is included as Attachment B.

Please telephone Lance Ericksen at (661) 654-7145 if you have any questions or require additional clarification.

Sincerely,



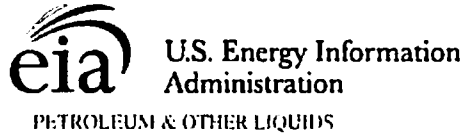
Gregory E. Pritchett

Manager – Health, Environment and Safety

Attachments

Additional Information Banking Application  
Project S-1122845  
December 19, 2013

**Attachment A**  
**California Oil Production**



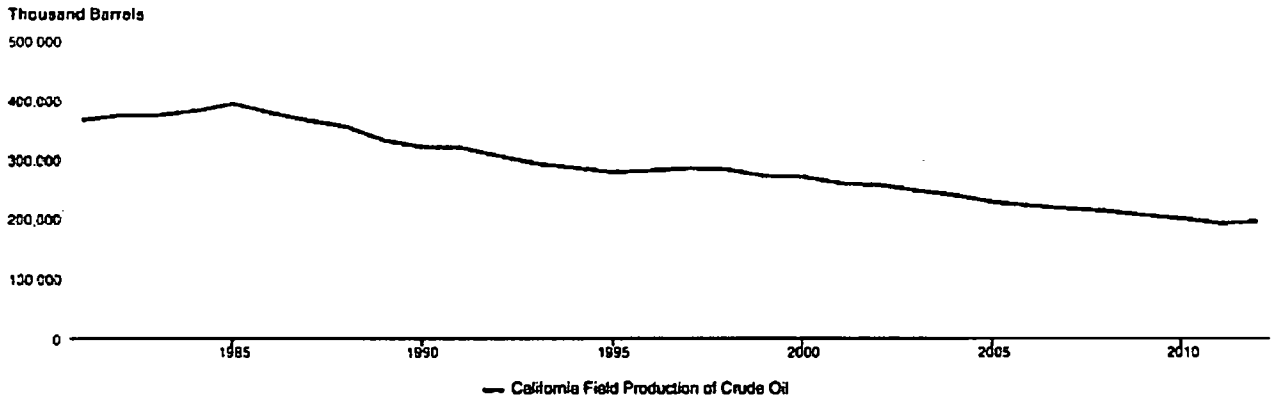
OVERVIEW **DATA** ANALYSIS & PROJECTIONS

GLOSSARY · FAQs ·

View History:  Monthly  Annual

Download Data (XLS File)

**California Field Production of Crude Oil**



Source: U.S. Energy Information Administration

Decade	Year-0	Year-1	Year-2	Year-3	Year-4	Year-5	Year-6	Year-7	Year-8	Year-9
1980's		365,170	373,176	374,161	381,621	394,002	378,059	364,608	354,730	331,174
1990's	320,868	319,497	305,488	293,090	286,060	278,977	282,409	285,172	283,627	273,017
2000's	271,132	260,663	257,898	248,170	240,206	229,350	223,449	218,525	214,544	207,094
2010's	201,385	193,691	196,324							

- = No Data Reported; -- = Not Applicable; NA = Not Available; W = Withheld to avoid disclosure of individual company data.

Release Date: 3/15/2013  
Next Release Date: 9/27/2013

Referring Pages:  

- Crude Oil Production

## **Attachment B**

### **Cap and Trade Program**

Reference

[www.arb.ca.gov/cc.capandtrade/guidance/chapter1.pdf](http://www.arb.ca.gov/cc.capandtrade/guidance/chapter1.pdf)

## CHAPTER 1: HOW DOES THE CAP-AND-TRADE PROGRAM WORK?

### 1.1 What is the Cap-and-Trade Program?

The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals. The statewide cap for GHG emissions from major sources, which is measured in metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e), will commence in 2013 and decline over time, achieving GHG emission reductions throughout the program's duration. Each covered entity will be required to surrender one permit to emit (the majority of which will be allowances, entities are also allowed to use a limited number of ARB offset credits) for each ton of GHG emissions they emit. Some covered entities will be allocated some allowances and will be able to buy additional allowances at auction, purchase allowances from others, or purchase offset credits.

### 1.2 What is the Mandatory Reporting of Greenhouse Gas Emissions Regulation?

The Cap-and-Trade Program relies on data collected through the Mandatory Reporting of Greenhouse Gas Emissions Regulation (MRR) to identify major sources of greenhouse gas emissions in California. The MRR was originally adopted in 2007 and was updated in 2011 to meet the needs of the Cap-and-Trade Program. The MRR requires facilities, fuel, and carbon dioxide (CO<sub>2</sub>) suppliers—as well as electric power entities—to report their annual GHG emissions in 2009 and every year thereafter. A detailed description of the reporting Regulation can be found in the Mandatory Reporting Guidance Document available at <http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep.htm>.

### 1.3 What are the Basic Components of the Cap-and-Trade Program?

#### 1.3.1. What Is an Allowance?

An *allowance* is a tradable permit to emit one metric ton of a carbon dioxide equivalent greenhouse gas emission. The total number of allowances provided by ARB each year will be equivalent to the annual allowance budget specified in the Regulation. Each allowance will have a unique serial number.

#### 1.3.2. What Is an Offset Credit?

An *offset credit* is equivalent to a GHG reduction or GHG removal enhancement of one metric ton of CO<sub>2</sub>e. The GHG reduction or GHG removal enhancement must be real, additional, quantifiable, permanent, verifiable, and enforceable and may only be issued to offset projects using approved Compliance Offset Protocols. ARB offset credits, along with allowances, are frequently referred to as “compliance instruments” since they are used by entities to comply with the program. However, a covered entity may only meet up to 8 percent of its compliance obligation using ARB offset credits. More information on the requirements for offset credits, approved Compliance Offset Protocols, and offset projects can be found in Chapter 6.

### **1.3.3 What Is a Compliance Period?**

A *compliance period* is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 are known as the “first compliance period,” and the years 2015–2017 are known as the “second compliance period.” The third compliance period is from 2018–2020. At the end of each compliance period each facility will be required to turn in compliance instruments, including allowances and a limited number of ARB offset credits, equivalent to their total GHG emissions throughout the compliance period.

### **1.4 Who Will Have to Comply with the Cap-and-Trade Program?**

Starting in 2012, major GHG-emitting sources, such as electricity generation (including imports), and large stationary sources (e.g., refineries, cement production facilities, oil and gas production facilities, glass manufacturing facilities, and food processing plants) that emit more than 25,000 MTCO<sub>2</sub>e per year will have to comply with the Cap-and-Trade Program. The program expands in 2015 to include fuel distributors (natural gas and propane fuel providers and transportation fuel providers) to address emissions from transportation fuels, and from combustion of other fossil fuels not directly covered at large sources in the program’s initial phase. Additional information, including a preliminary list of the covered entities, can be found in Chapter 2 and at [http://www.arb.ca.gov/cc/capandtrade/covered\\_entities\\_list.pdf](http://www.arb.ca.gov/cc/capandtrade/covered_entities_list.pdf).

### **1.5 How Do I Determine if My Company Needs to Comply with Cap-and-Trade Program?**

Most facilities within the specified sectors mentioned above that emit GHGs will have to comply with the Cap-and-Trade Program and/or the Mandatory Reporting Regulation. Some facilities will be required to report their annual emissions but not have to surrender compliance instruments. This is determined by the type of energy or industrial sector and the facility’s annual GHG emissions. For example, most industries that emit 10,000 or greater metric tons of CO<sub>2</sub>e are required to report their GHGs whereas, the subset of industrial facilities with annual emissions equal to or greater than 25,000 metric tons of CO<sub>2</sub>e are required to comply with the Cap-and-Trade Program. To determine if your facility is subject to both or either regulation, please refer to the detailed description in Chapter 2.

#### **1.5.1 What Does My Company Have to Do in Order to Comply with the Cap-and-Trade Regulation?**

To comply with the Cap-and-Trade Regulation, each facility must register with ARB, report its annual GHG emissions, create the necessary accounts, designate an account authorized representative, and surrender compliance instruments by the established deadlines. Facilities are also required to retain their records for 10 years. A more detailed explanation of each of these requirements is located in Chapter 3.

**1.6 What Is a Compliance Obligation, and How Does My Company Determine How Many Allowances and ARB Offset Credits We Need to Surrender?**

A company's *compliance obligation* is equivalent to the quantity of allowances or a limited number of ARB offset credits a facility is required to surrender to ARB by a specified deadline in order to comply with the Cap-and-Trade Program. Each facility's compliance obligation will be determined by the quantity of reported and verified GHGs emissions. ARB will directly allocate a proportion of allowances to qualified facilities subject to the program. Each facility will be responsible for acquiring the remaining allowances or limited number of offset credits to comply with the program. Chapter 3 describes how to estimate the quantity of allowances your facility will be freely allocated. A discussion of how to acquire allowances and offset credits can be found in Chapter 5.

**1.7 What Are the Deadlines for Each Action Required by My Company?**

Table 1.1 summarizes the major compliance requirements for covered entities. Please refer to the subsequent chapters in this document and the Regulation for additional details.

Table 1.1. Main Compliance Deadlines for Covered Entities			
Event	Description	Regulation Location	Occurrence
<b>Reporting and Verification</b>			
<b>MRR reporting deadline for most entities</b>	Deadline to submit GHG reports to ARB using the online mandatory reporting tool. Applies to all stationary sources that are not electric power entities.	95103 (e)	April 10 of each year
<b>MRR reporting deadline for electric power entities</b>	Deadline to submit GHG reports to ARB using the online mandatory reporting tool. Applies to all electric power entities.	95103 (e)	June 1 of each year
<b>MRR verification deadline</b>	Deadline of verification statement to be received by ARB from verification body.	95103 (f)	September 1 of each year



<b>Deadline for Offset Verification Statements</b>	Deadline of offset verification statements to be received by ARB.	95977 (d)	Within nine months after the conclusion of the Reporting Period for which offset verification services were performed.
<b>Opt-in Covered Entities Reporting Deadline</b>	Deadline for opt-in covered entities to submit GHG reports to ARB using the online mandatory reporting tool.		<ul style="list-style-type: none"> <li>• In 2012, the recommended deadline was June 1, 2012.</li> <li>• For years 2013 and subsequent, the recommended deadline is April 10.</li> </ul>
<b>Program Registration</b>			
<b>Program registration deadline for covered entities</b>	Deadline to register for the Cap-and-Trade Program for covered entities	95830 (d)(1)(B)	January 31, 2012
<b>Registration deadlines for new entrants</b>	Deadline to register for the Cap-and-Trade Program for facilities that became covered entities	95830 (d)(1)(A)	Within 30 calendar days of the reporting deadline contained in the MRR if the entity is not a covered entity as of January 1, 2013.
<b>Request to Opt Into Program</b>	Opt-in covered entities must submit a request to opt into program by requesting a user ID through the Compliance Instrument Tracking System Service (CITSS).	95830 (d)(2)	<ul style="list-style-type: none"> <li>• In 2012, opt-in covered entities should make their request by November 30, 2012.</li> <li>• For 2013 and subsequent years, opt-in covered entities should make their request by March 1.</li> </ul>
<b>Allocation</b>			
<b>Allocation to utilities for the next calendar year</b>	Distribution of free allowances into utilities' holding account for the following calendar year emissions. For example, on July 15, 2012, allowances will	95870 (d)	September 14, 2012; November 1 of 2013 to 2019.

	be distributed for the 2013 calendar year.		
<b>Allocation to industry for the next calendar year</b>	Distribution of free allowances into industrial facilities' holding account for the following calendar year emissions. For example, on November 1, 2012, allowances will be distributed for the 2013 calendar year.	95870 (e)	November 1 of 2012 to 2019
<b>POU (Publicly Owned Utility) Compliance/Holding Accounts</b>	POUs must inform ARB of the share of their allowances that should be placed in compliance versus holding accounts	95892 (b)(2)	September 1 of 2012 to 2019
<b>Auction</b>			
<b>Auction Registration</b>	Registration deadline for Auctions	95912 (c)(2)	Registration deadline for an auction occurs 30 days prior to the auction.
<b>Auction</b>	Auction of compliance allowances	95910 (a)	In 2012, single auction on November 14. Starting 2013, four auctions will occur each year on the twelfth business day, or first business day thereafter, of the second month of each quarter. For example, 2013 auctions will be held February 19, May 16, August 16, and November 19.

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JUL 19 2012



**Jason H. Donchin**  
Manager – Health, Environment,  
and Safety

San Joaquin Valley South  
Chevron North America  
Exploration and Production  
P.O. Box 1392  
Bakersfield, CA 93302

July 19, 2012

Leonard Scandura  
San Joaquin Valley APCD  
34946 Flyover Court  
Bakersfield, California 93308

**RE: Application for Emission Reduction Credit Banking Certificate**

Dear Mr. Scandura:

Chevron U.S.A. Inc. (CUSA) shutdown the North Midway gas turbines (Permits S-1129-53, -54, and -55). The units are currently permitted as non-compliant dormant units. Pursuant to District Rule 2301 – Emission Reduction Credit Banking as amended January 19, 2012 CUSA is submitting this application for CO2E Banking Certificates. Chevron is also requesting criteria ERC Certificates. Additional details are included with the attached proposal, which is available in electronic format upon request. Enclosed please find the necessary application form and a \$759.00 check for application filing fee.

If you have any questions, please contact Mr. Lance Ericksen at phone number (661) 654-7145.

Sincerely,

A handwritten signature in black ink that reads "Jason H. Donchin".

Jason H. Donchin  
Health, Environment and Safety Manager

LE  
Attachments

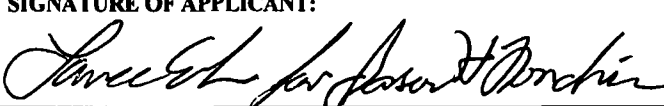
# San Joaquin Valley Air Pollution Control District

## Application for

**RECEIVED**  
**JUL 19 2012**  
SJVAPCD  
Southern Region

EMISSION REDUCTION CREDIT (ERC)

CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: <b>Chevron U.S.A. Inc.</b>		Facility ID: S-1129 (if known)				
2. MAILING ADDRESS: Street/P.O. Box: <b>P.O. Box 1392</b>						
City: <b>Bakersfield</b>		State: <b>CA</b> Zip Code: <b>93302</b>				
3. LOCATION OF REDUCTION: Street: <b>A Fee and C Fee</b> City: <b>Kern River Oilfield</b> <i>North Midway</i>		4. DATE OF REDUCTION: <b>Dec. 2011</b>				
SECTION <b>34</b> TOWNSHIP <b>30S</b> RANGE <b>22E</b>						
5. PERMIT NO(S): <b>S-1129-53, '54, '55</b>		EXISTING ERC NO(S):				
6. METHOD RESULTING IN EMISSION REDUCTION:  <input checked="" type="checkbox"/> SHUTDOWN <input type="checkbox"/> RETROFIT <input type="checkbox"/> PROCESS CHANGE <input type="checkbox"/> OTHER DESCRIPTION: <b>Shutdown of A Fee and C Fee Gas Turbines</b> (Use additional sheets if necessary)						
7. REQUESTED ERCs: (In pounds per calendar quarter except CO <sub>2e</sub> )						
	VOC	NO <sub>x</sub>	CO	PM <sub>10</sub>	SO <sub>x</sub>	Other
1 <sup>st</sup> Qtr	3530	3394	909	1305	334	
2 <sup>nd</sup> Qtr	4741	4558	1196	1753	449	
3 <sup>rd</sup> Qtr	4897	4709	1258	1811	464	
4 <sup>th</sup> Qtr	4170	4009	1077	1542	395	
CO <sub>2e</sub> <span style="border: 1px solid black; padding: 2px;">30,246</span> metric ton/yr						
8. SIGNATURE OF APPLICANT: 		TYPE OR PRINT TITLE OF APPLICANT: <b>Manager Health Environment, and Safety</b>				
9. TYPE OR PRINT NAME OF APPLICANT: <b>Jason H. Donchin</b>			DATE: <b>7/19/2012</b>	TELEPHONE NO: <b>(661) 654-7145</b>		

FOR APCD USE ONLY:

*Chevron NA Exploration Prod Co.*

DATE STAMP	FILING FEE RECEIVED: \$ <u>759.00</u> , CR# <u>24176456</u> DATE PAID: <u>PM 7-19-12</u> PROJECT NO.: <u>S-1122845</u> FACILITY ID.: <u>S-1129</u>
------------	--

*ERC original*  
*Banking*

**ERC APPLICATION  
EVALUATION**

Project #:

Engineer:

Date:

Facility Name: Chevron USA, Inc.  
Mailing Address: P.O. Box 1392  
Bakersfield, CA 93302

Contact Person: Lance Ericksen  
Telephone: (661) 654-7145  
Date Application Received:  
Date Deemed Complete:

**I. Summary:**

Chevron USA, Inc. (CUSA) proposes to bank criteria and greenhouse gas (CO<sub>2</sub>E) emission reduction credits resulting from the shutdown of the North Midway gas turbine engines (S-1129-53, 54, and '55) in the Heavy Oil Western Stationary Source.

CUSA requests emission reduction credits for:

lb/quarter	VOC	NO <sub>x</sub>	CO	PM10	SO <sub>x</sub>	CO <sub>2</sub> E
1 <sup>st</sup> Quarter	3530	3394	909	1305	334	
2 <sup>nd</sup> Quarter	4741	4558	1196	1753	449	
3 <sup>rd</sup> Quarter	4897	4709	1258	1811	464	
4 <sup>th</sup> Quarter	4170	4009	1077	1542	395	
MT/year						30246

**II. Applicable Rules:**

Rule 2301 Emission Reduction Credit Banking (Amended January 19, 2012)

**III. Location of Reduction:**

The turbines location is:

Sec 34 T30S R 22E

#### **IV. Method of Generating Reduction:**

The natural gas fired turbines were shutdown in December of 2011 and are currently in dormant status. It is expected the turbine permits will be surrendered for banking..

#### **V. ERC Calculations:**

Criteria emission reductions are banked in accordance with section 4.2 of Rule 4301.

Greenhouse gas emission reductions are banked in accordance with Section 4.5 of Rule 2301.

#### **A. Assumptions and Emission Factors**

Emission reductions for the permitted turbines are calculated using measured and recorded heat input values. Energy consumption and resulting emissions are tabulated and presented in Appendix A.

Each turbine is rated at 48.7 MMBtu/hr and is subject to the following emission limitations:

VOC	1.65 lb/hr
NOx	35 ppmv @ 15% O <sub>2</sub>
CO	41 ppmv @ 15% O <sub>2</sub>
PM10	0.61 lb/hr
SOx	0.16 lb/hr

The equivalent emission factors in lb/MMBtu are:

VOC	0.0338 lb/MMBtu
PM10	0.0125 lb/MMBtu
SOx	0.0032 lb/MMBtu

In addition the turbines are subject to Rule 4703 table 5.3 c which limits NOx to 9 ppmv and CO to 25 ppmv at 15% O<sub>2</sub>.

The 4703 equivalent emission limits in lb/MMBtu are:

NOx	0.0325 lb/MMBtu
CO	0.055 lb/MMBtu

A review of source tests for the turbines indicated that NOx emissions exceed the Rule 4703 limit. Therefore, the rule limit will be used to determine bankable emissions. For CO source tests showed the actual CO was below the permit and Rule 4703 limits therefore, the source test results will be used to determine bankable emissions. The

CO source test emissions are included in Appendix C and summarized below:

S-1129-53 0.0088 lb/MMBtu  
 S-1129-54 0.0114 lb/MMBtu  
 S-1129-55 0.0077 lb/MMBtu

Emissions factors from the "California Air Resources Board Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, Appendix A", are used to quantify CO2E. The emissions factors are as shown below:

Carbon Dioxide - Natural Gas Combustion - 53.02 Kg CO<sub>2</sub>/MMBtu  
 Methane – Natural Gas Combustion - 0.9 g CH<sub>4</sub>/MMBtu, 0.0009 Kg CH<sub>4</sub>/MMBtu  
 Nitrous Oxide – Natural Gas Combustion – 0.1 g N<sub>2</sub>O/MMBtu. 0.0001 Kg N<sub>2</sub>O/MMBtu

Rule 2301 Table 1 Conversion factors are used to convert Carbon Dioxide, Methane and Nitrous Oxide emissions to CO2E. The conversion factors are as shown below:

Carbon Dioxide 1 Metric Ton CO2E per CO<sub>2</sub> Metric Ton  
 Methane 21 Metric Ton CO2E per CH<sub>4</sub> Metric Ton  
 Nitrous Oxide 310 Metric Ton CO2E per N<sub>2</sub>O Metric Ton

The GHG emission factors and CO2E conversion factors are combined as follows to give an overall emission factor for CO2E:

$$\begin{aligned} \text{Carbon Dioxide} &= \frac{53.02 \text{ Kg}}{\text{MMBtu}} \times \frac{1 \text{ Mt CO2E}}{\text{CO2 metric ton}} \times \frac{1 \text{ metric ton}}{1000 \text{ Kg}} \\ &= 0.05302 \frac{\text{Mt CO2E}}{\text{MMBtu}} \end{aligned}$$

$$\begin{aligned} \text{Methane} &= \frac{.0009 \text{ Kg}}{\text{MMBtu}} \times \frac{21 \text{ Mt CO2E}}{\text{Methane metric ton}} \times \frac{1 \text{ metric ton}}{1000 \text{ Kg}} \\ &= 0.000019 \frac{\text{Mt CO2E}}{\text{MMBtu}} \end{aligned}$$

$$\begin{aligned} \text{Nitrous Oxide} &= \frac{0.0001 \text{ Kg}}{\text{MMBtu}} \times \frac{310 \text{ Mt CO2E}}{\text{Nitrous Oxide metric ton}} \times \frac{1 \text{ metric ton}}{1000 \text{ Kg}} \\ &= 0.000031 \frac{\text{Mt CO2E}}{\text{MMBtu}} \end{aligned}$$

Overall emission factor:

$$= \frac{0.05302 \text{ Mt CO}_2\text{E}}{\text{MMBtu}} + \frac{0.000019 \text{ Mt CO}_2\text{E}}{\text{MMBtu}} + \frac{0.000031 \text{ Mt CO}_2\text{E}}{\text{MMBtu}}$$

$$= \frac{0.05307 \text{ Mt CO}_2\text{E}}{\text{MMBtu}}$$

## B. Historic Annual Average Period Determination

CUSA requests the 24-month period used to determine historic annual average emissions be the 24 months that represent normal source operation. To determine normal source operation the turbine fuel use was examined for the period January 2007 through June 2012. The average fuel use for each turbine over the 5.5 year period was compared to running two-year periods during the 5.5 year period. The two-year period that is closest to the 5.5 year average was selected as the historic annual average period. Representative records used, fuel averages for the 5.5 year period and the historic annual average period fuel use are shown in Appendix A. The data in its entirety is available in electronic format.

## C. Criteria Emission Reductions

Section 4.5.4 of Rule 2301 states that the actual emission reductions (AER) are calculated in accordance with the procedures of Rule 2201.

AER for each turbine is shown in Appendix B.

In accordance with District Rule 2201, Section 4.12.1, AER shall be discounted by 10% prior to banking, known as the Air Quality Improvement Deduction (AQID).

AQID for each turbine is shown in Appendix B.

The resulting bankable emissions reductions are shown in Appendix B and summarized below:

lb/qtr	VOC	NO <sub>x</sub>	CO	PM <sub>10</sub>	SO <sub>x</sub>
Bankable Q1	3530	3394	909	1305	334
Bankable Q2	4741	4558	1196	1753	449
Bankable Q3	4897	4709	1258	1811	464
Bankable Q4	4170	4009	1077	1542	395

## D. Greenhouse Gas Emission Reductions

Section 4.5.4 of Rule 2301 states that greenhouse gas emission reductions are calculated as the difference between the historic annual average greenhouse gas



emissions (as CO<sub>2</sub>E) and the potential greenhouse gas emission (as CO<sub>2</sub>E) after the project is complete.

Because the greenhouse gas emission reductions are the result of discontinuing the operation of the turbines, the potential greenhouse gas emissions after the project is complete are considered zero. Therefore, the greenhouse gas emission reductions are equal to the historic annual average greenhouse gas emissions (as CO<sub>2</sub>E).

The fuel use data for each turbine is shown in Appendix A.

### **Greenhouse Gas Emission Reductions As CO<sub>2</sub>E**

Calculations for each turbine are shown in Appendix B.

Total CO<sub>2</sub>E Emission Reductions = **30,246 metric tons/year**

## **VI. Compliance:**

### **A. Real**

Emission reductions have been calculated based on the heat input to each turbine and recognized emission factors and conversion factors. Therefore, the reductions are real.

### **B. Enforceable**

The turbines have been removed from service and permits will be surrendered prior to final issuance of the banking certificates. Therefore, the requested ERCs are enforceable.

### **C. Quantifiable**

Emission reductions have been calculated based on the heat input to each turbine and recognized emission factors and conversion factors. Therefore, the reductions are quantifiable.

### **D. Permanent**

The turbines have been shutdown and permits will be surrendered prior to final issuance of the banking certificates. .

Although some of the heat previously provided by the turbines may be supplied by other equipment for criteria emissions all equipment will operate within authorize daily emissions limitations.

For greenhouse gas emissions emission increases of CO<sub>2</sub>E that may occur elsewhere are adequately addressed by other regulatory requirements.

On October 20, 2011 the California Air Resources Board approved the Cap-and-Trade regulation for greenhouse gases. The regulation sets a declining cap on allowed emissions while employing market mechanisms to achieve emission reductions. An overall 2020 targeted limit of 334.2 million metric tons (MMT) of carbon dioxide equivalent (CO<sub>2</sub>e) on GHG emissions from most of the California economy – the “capped sectors” – is established by the cap-and-trade program. In the cap-and-trade program, a limit, or *cap* is put on the amount of pollutants (i.e., GHGs) that can be emitted. The cap is implemented by creating allowances in a number equal to the cumulative emissions from all the covered sectors. Each allowance provides a limited authorization to emit one metric ton (MT) of CO<sub>2</sub>e. These allowances may be auctioned, distributed for free, or allocated by some combination thereof. Sources in the capped sectors must report their emissions and must surrender allowances to match those emissions in accordance with the schedule in the regulation to achieve the 2020 cap.

Capped sectors include oil, gas production and electrical generation and most other large industrial operations. Any increases in greenhouse gas emissions that would occur elsewhere because of the shutdown of the emissions units in these projects must be accommodated under the Cap-and-Trade regulation to achieve the overall 2020 cap. It is therefore, not necessary to quantify increases in greenhouse gas emissions that may occur elsewhere due to the shutdown of these emissions units. The Cap-and-Trade regulation provides an adequate mechanism to address any potential increase.

Therefore, the requested ERCs are permanent.

#### E. Surplus

For criteria emissions:

For turbines subject to Rule 4703 emissions have been calculated consistent with the limits in the Rule. No other restrictions on emission are imposed by rules or regulations.

For greenhouse gas emissions:

Rule 2301 Section 4.5.3.1 states:

Greenhouse gas emission reductions that occur at a facility subject to the CARB greenhouse cap and trade regulation on or after January 1, 2012 are not surplus.

These reductions occurred prior to January 1, 2012.

Rule 2301 Section 4.5.3.2 states:

Greenhouse gas emission reductions that occur as a result of law, rule, or regulation that required the greenhouse gas emission reduction are not surplus.

These reductions are not required by any law, rule or regulation that required the greenhouse gas emission reduction.

Therefore, the greenhouse gas emissions requested for ERC banking are surplus.

**F. Was application timely?**

For criteria emissions:

Rule 2301 section 4.2.3 requires an application be filed no later than 180 days after the emission reductions occurred. Permits for the turbines were maintained within the 180-day period preceding this ERC application. Therefore, the application is timely.

Pursuant to Rule 2301 section 5.5.2 for reductions covered under section 4.5.1 (greenhouse gas reductions that occurred on or after January 1, 2005) applications shall be filed by July 19, 2012. This application was filed in a timely manner.

**VII. Registration of ERC Certificates:**

Rule 2301 Section 6.15 requires greenhouse gas emission reductions certificates include a notation that indicates how the emission reductions were quantified.

The shutdown of the turbines was not required by any regulatory requirement therefore, the certificates shall include a notation pursuant to Section 6.15.3:

This emission reduction is surplus and additional to all applicable regulatory requirements.

**VIII. Recommendation:**

CUSA recommends that Emission Reduction Credits be issued as indicated above.

**APPENDIX A**  
**DATA TABLES**

# MDW34Z COGEN FUEL USAGE REPORT - ALL UNITS

date of report: 7/18/2012 11:50 AM

## Daily Summary

Day	Unit #	Engine Fuel	Engine Fuel	Burner Fuel	Burner Fuel	System Fuel	System Fuel
		(MMBtu)	(MCF)	(MMBtu)	(MCF)	(MMBtu)	(MCF)
1/1/2007	7	1,128.50	1,007.50	0	0	1,128.50	1,007.50
1/2/2007	7	1,129.20	1,008.30	0	0	1,129.20	1,008.30
1/3/2007	7	1,130.60	1,009.40	0	0	1,130.60	1,009.40
1/4/2007	7	1,129.50	1,008.50	0	0	1,129.50	1,008.50
1/5/2007	7	1,130.50	1,009.30	0	0	1,130.50	1,009.30
1/6/2007	7	1,129.60	1,008.60	0	0	1,129.60	1,008.60
1/7/2007	7	1,126.90	1,006.20	0	0	1,126.90	1,006.20
1/8/2007	7	1,130.80	1,009.60	0	0	1,130.80	1,009.60
1/9/2007	7	1,126.70	1,006.10	0	0	1,126.70	1,006.10
1/10/2007	7	1,127.80	1,006.90	0	0	1,127.80	1,006.90
1/11/2007	7	1,126.30	1,005.60	0	0	1,126.30	1,005.60
1/12/2007	7	1,125.50	1,005.00	0	0	1,125.50	1,005.00
1/13/2007	7	1,130.50	1,009.40	0	0	1,130.50	1,009.40
1/14/2007	7	1,121.90	1,001.80	0	0	1,121.90	1,001.80
1/15/2007	7	1,111.30	992.3	0	0	1,111.30	992.3
1/16/2007	7	880.4	786.1	0	0	880.4	786.1
1/17/2007	7	1,131.70	1,010.40	0	0	1,131.70	1,010.40
1/18/2007	7	1,099.20	991.7	0	0	1,099.20	991.7
1/19/2007	7	1,092.90	1,000.90	0	0	1,092.90	1,000.90
1/20/2007	7	1,087.80	996.3	0	0	1,087.80	996.3
1/21/2007	7	1,091.20	999.2	0	0	1,091.20	999.2
1/22/2007	7	1,107.80	1,014.50	0	0	1,107.80	1,014.50
1/23/2007	7	1,128.80	1,033.70	0	0	1,128.80	1,033.70
1/24/2007	7	1,131.80	1,036.40	0	0	1,131.80	1,036.40
1/25/2007	7	511	467.9	0	0	511	467.9
1/26/2007	7	0	0	0	0	0	0
1/27/2007	7	0	0	0	0	0	0
1/28/2007	7	0	0	0	0	0	0
1/29/2007	7	0	0	0	0	0	0
1/30/2007	7	0	0	0	0	0	0
1/31/2007	7	0	0	0	0	0	0
2/1/2007	7	0	0	0	0	0	0
2/2/2007	7	0	0	0	0	0	0
2/3/2007	7	0	0	0	0	0	0
2/4/2007	7	0	0	0	0	0	0
2/5/2007	7	0	0	0	0	0	0
2/6/2007	7	0	0	0	0	0	0
2/7/2007	7	0	0	0	0	0	0
2/8/2007	7	0	0	0	0	0	0
2/9/2007	7	0	0	0	0	0	0
2/10/2007	7	0	0	0	0	0	0
2/11/2007	7	314.9	288.4	0	0	314.9	288.4
2/12/2007	7	421.8	386.3	0	0	421.8	386.3
2/13/2007	7	0	0	0	0	0	0
2/14/2007	7	0	0	0	0	0	0
2/15/2007	7	0	0	0	0	0	0
2/16/2007	7	0	0	0	0	0	0
2/17/2007	7	0	0	0	0	0	0
2/18/2007	7	0	0	0	0	0	0
2/19/2007	7	0	0	0	0	0	0
2/20/2007	7	0	0	0	0	0	0
2/21/2007	7	0	0	0	0	0	0
2/22/2007	7	0	0	0	0	0	0
2/23/2007	7	0	0	0	0	0	0
2/24/2007	7	0	0	0	0	0	0
2/25/2007	7	0	0	0	0	0	0
2/26/2007	7	179.9	168.1	0	0	179.9	168.1
2/27/2007	7	331.4	309.7	0	0	331.4	309.7
2/28/2007	7	132.3	123.6	0	0	132.3	123.6

9/1/2010	7	0	0	0	0	0	0	221122.7	11837
9/2/2010	7	0	0	0	0	0	0	220562.7	11277
9/3/2010	7	0	0	0	0	0	0	220000.1	10714
9/4/2010	7	0	0	0	0	0	0	219441.2	10155
9/5/2010	7	0	0	0	0	0	0	218880.6	9595
9/6/2010	7	0	0	0	0	0	0	218321.9	9038
9/7/2010	7	0	0	0	0	0	0	217762.9	8477
9/8/2010	7	0	0	0	0	0	0	217203.2	7917
9/9/2010	7	0	0	0	0	0	0	216645.2	7359
9/10/2010	7	0	0	0	0	0	0	216089.4	6804
9/11/2010	7	0	0	0	0	0	0	215533	6247
9/12/2010	7	0	0	0	0	0	0	214977	5691
9/13/2010	7	0	0	0	0	0	0	214420.9	5135
9/14/2010	7	0	0	0	0	0	0	213861.7	4578
9/15/2010	7	0	0	0	0	0	0	213300.9	4015
9/16/2010	7	0	0	0	0	0	0	212743.6	3458
9/17/2010	7	0	0	0	0	0	0	212194.8	2909
9/18/2010	7	0	0	0	0	0	0	211644.7	2359
9/19/2010	7	0	0	0	0	0	0	211092.5	1807
9/20/2010	7	0	0	0	0	0	0	210541.1	1255
9/21/2010	7	0	0	0	0	0	0	209990	704
9/22/2010	7	0	0	0	0	0	0	209437.6	152 Baseline Period 9/23/2008 to 9/22/2010
9/23/2010	7	0	0	0	0	0	0	208886.1	-400 First 52481.35
9/24/2010	7	0	0	0	0	0	0	208333.8	-952 Second 37556.05
9/25/2010	7	0	0	0	0	0	0	207781.3	-1505 Third 51132.65
9/26/2010	7	0	0	0	0	0	0	207229.4	-2056 Fourth 67716.05
9/27/2010	7	0	0	0	0	0	0	206675.1	-2611
9/28/2010	7	0	0	0	0	0	0	206117.5	-3168
9/29/2010	7	0	0	0	0	0	0	205560	-3728
9/30/2010	7	0	0	0	0	0	0	205002.9	-4283

2/1/2011	8	0.4	0.4	0	0	0.4	0.4	288847	2121	
2/2/2011	8	0	0	0	0	0	0	288279.6	1553	
2/3/2011	8	0	0	0	0	0	0	287711.3	985	
2/4/2011	8	0	0	0	0	0	0	287146.5	420	
2/5/2011	8	789.1	706.3	0	0	789.1	708.3	286976.6	250	
2/6/2011	8	1,065.90	954.1	0	0	1,065.90	954.1	286949.1	223	
2/7/2011	8	1,029.30	921.3	0	0	1,029.30	921.3	286903.9	177	
2/8/2011	8	1,030.40	922.3	0	0	1,030.40	922.3	286861	135	
2/9/2011	8	1,030.30	922.2	0	0	1,030.30	922.2	286816.4	90	
2/10/2011	8	1,032.30	924	0	0	1,032.30	924	286773.4	47	
2/11/2011	8	1,079.70	966.4	0	0	1,079.70	966.4	286753.2	27	
2/12/2011	8	1,074.30	961.6	0	0	1,074.30	961.6	286727.7		1 Baseline Period 2/13/2009 to 2/12/2011
2/13/2011	8	1,051.90	941.5	0	0	1,051.90	941.5	286691.1	-35	First 53480
2/14/2011	8	1,048.50	938.5	0	0	1,048.50	938.5	286653.3	-73	Second 79569
2/15/2011	8	1,051.10	940.8	0	0	1,051.10	940.8	286813.3	87	Third 92368
2/18/2011	8	1,047.60	937.7	0	0	1,047.60	937.7	287337.1	611	Fourth 60748
2/17/2011	8	1,072.40	959.9	0	0	1,072.40	959.9	287538.8	812	
2/18/2011	8	1,092.70	978.1	0	0	1,092.70	978.1	287524.3	798	
2/19/2011	8	1,063.50	969.8	0	0	1,063.50	969.8	287507.7	781	
2/20/2011	8	1,086.30	972.3	0	0	1,086.30	972.3	287600.6	874	
2/21/2011	8	1,088.00	973.8	0	0	1,088.00	973.8	288144.6	1418	
2/22/2011	8	1,094.30	979.5	0	0	1,094.30	979.5	288691.7	1965	
2/23/2011	8	1,092.50	977.9	0	0	1,092.50	977.9	289238	2511	
2/24/2011	8	1,092.30	977.7	0	0	1,092.30	977.7	289784.1	3058	
2/25/2011	8	1,086.70	972.7	0	0	1,086.70	972.7	290327.5	3601	
2/26/2011	8	1,078.30	965.1	0	0	1,078.30	965.1	290866.6	4140	
2/27/2011	8	1,073.20	960.6	0	0	1,073.20	960.6	291403.2	4677	
2/28/2011	8	1,076.30	963.4	0	0	1,076.30	963.4	291941.4	5215	

4/1/2010	9	0	0	0	0	0	0	84319.2	8840
4/2/2010	9	0	0	0	0	0	0	84319.2	8840
4/3/2010	9	0	0	0	0	0	0	84319.2	8840
4/4/2010	9	0	0	0	0	0	0	84319.2	8840
4/5/2010	9	0	0	0	0	0	0	84319.2	8840
4/6/2010	9	0	0	0	0	0	0	84319.2	8840
4/7/2010	9	0	0	0	0	0	0	84319.2	8840
4/8/2010	9	0	0	0	0	0	0	84319.2	8840
4/9/2010	9	0	0	0	0	0	0	84319.2	8840
4/10/2010	9	0	0	0	0	0	0	84268.15	8789
4/11/2010	9	0	0	0	0	0	0	84150.95	8672
4/12/2010	9	0	0	0	0	0	0	83660.45	8181
4/13/2010	9	0	0	0	0	0	0	83120.6	7642
4/14/2010	9	0	0	0	0	0	0	82576.05	7097
4/15/2010	9	0	0	0	0	0	0	82028.5	6548
4/16/2010	9	0	0	0	0	0	0	81475.6	5997
4/17/2010	9	0	0	0	0	0	0	80924.75	5446
4/18/2010	9	0	0	0	0	0	0	80375.05	4896
4/19/2010	9	0	0	0	0	0	0	79828.1	4347
4/20/2010	9	0	0	0	0	0	0	79275.9	3797
4/21/2010	9	0	0	0	0	0	0	78724.85	3248
4/22/2010	9	0	0	0	0	0	0	78172.8	2694
4/23/2010	9	0	0	0	0	0	0	77621.25	2142
4/24/2010	9	0	0	0	0	0	0	77069.3	1590
4/25/2010	9	0	0	0	0	0	0	76520	1041
4/26/2010	9	0	0	0	0	0	0	75972.05	493
4/27/2010	9	0	0	0	0	0	0	75424.3	-55 Baseline Period 4/28/2008 to 4/27/2010
4/28/2010	9	0	0	0	0	0	0	74876.75	-602 First 10068.35
4/29/2010	9	0	0	0	0	0	0	74328.65	-1150 Second 38721.95
4/30/2010	9	0	0	0	0	0	0	73778.75	-1700 Third 17484.5
5/1/2010	9	0	0	0	0	0	0	73224.65	-2254 Fourth 8601.95
5/2/2010	9	0	0	0	0	0	0	72681.1	-2798



Fuel Summary

Day	Unit #	Engine Fuel (MMBtu)	Engine Fuel (MCF)	Burner Fuel (MMBtu)	Burner Fuel (MCF)	System Fuel (MMBtu)	System Fuel (MCF)
Unit 7 Totals		1,151,072.00	1,039,759.40	0	0	1,151,072.00	1,039,759.40
Unit 8 Totals		1,576,995.50	1,422,950.00	0	0	1,576,995.50	1,422,950.00
Unit 9 Totals		415,134.30	378,160.60	0	0	415,134.30	378,160.60

5.5 years Januray 2007 through June 2012

Unit 7 Per Year Average Last 5.5 years	209286
Unit 8 Per Year Average Last 5.5 years	286726
Unit 9 Per Year Average Last 5.5 years	75479
Total Units 7, 8, 9 2 Average 5.5 years	571491

**APPENDIX B**  
**Emission Calculations**

Total Bankable Emission Reduction Credits						
	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	3530	3394	909	1305	334	
2 <sup>nd</sup> Quarter	4741	4558	1196	1753	449	
3 <sup>rd</sup> Quarter	4897	4709	1258	1811	464	
4 <sup>th</sup> Quarter	4170	4009	1077	1542	395	
MT/year						<b>30,246</b>

## S-1129-53 CG-7

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	52481
2 <sup>nd</sup> Quarter	37556
3 <sup>rd</sup> Quarter	51132
4 <sup>th</sup> Quarter	67716

	VOC	NOx	CO	PM10	SOx	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
2 <sup>nd</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
3 <sup>rd</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
4 <sup>th</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307

### Actual Emisions

	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	1774	1706	462	656	168	2785
2 <sup>nd</sup> Quarter	1269	1221	330	469	120	1993
3 <sup>rd</sup> Quarter	1728	1662	450	639	164	2714
4 <sup>th</sup> Quarter	2289	2201	596	846	217	3594
MT/year						<b>11,086</b>

### AQID

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	177	171	46	66	17
2 <sup>nd</sup> Quarter	127	122	33	47	12
3 <sup>rd</sup> Quarter	173	166	45	64	16
4 <sup>th</sup> Quarter	229	220	60	85	22

### Bankable Criteria Emission Reduction Credits

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	1596	1535	416	590	151
2 <sup>nd</sup> Quarter	1142	1099	297	423	108
3 <sup>rd</sup> Quarter	1555	1496	405	575	147
4 <sup>th</sup> Quarter	2060	1981	536	762	195

## S-1129-54 CG-8

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	53480
2 <sup>nd</sup> Quarter	79569
3 <sup>rd</sup> Quarter	92368
4 <sup>th</sup> Quarter	60748

	VOC	NOx	CO	PM10	SOx	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
2 <sup>nd</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
3 <sup>rd</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307
4 <sup>th</sup> Quarter	0.0338	0.0325	0.0088	0.0125	0.0032	0.05307

### Actual Emisissions

	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	1808	1738	471	669	171	2838
2 <sup>nd</sup> Quarter	2689	2586	700	995	255	4223
3 <sup>rd</sup> Quarter	3122	3002	813	1155	296	4902
4 <sup>th</sup> Quarter	2053	1974	535	759	194	3224
MT/year						<b>15,187</b>

### AQID

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	181	174	47	67	17
2 <sup>nd</sup> Quarter	269	259	70	99	25
3 <sup>rd</sup> Quarter	312	300	81	115	30
4 <sup>th</sup> Quarter	205	197	53	76	19

### Bankable Criteria Emission Reduction Credits

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	1627	1564	424	602	154
2 <sup>nd</sup> Quarter	2420	2327	630	895	229
3 <sup>rd</sup> Quarter	2810	2702	732	1039	266
4 <sup>th</sup> Quarter	1848	1777	481	683	175

## S-1129-55 CG-9

Fuel Use	MMBtu
1 <sup>st</sup> Quarter	10068
2 <sup>nd</sup> Quarter	38721
3 <sup>rd</sup> Quarter	17484
4 <sup>th</sup> Quarter	8602

	VOC	NOx	CO	PM10	SOx	CO <sub>2</sub> E
Units	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	lb/MMBtu	Mt/MMBtu
1 <sup>st</sup> Quarter	0.0338	0.0325	0.0077	0.0125	0.0032	0.05307
2 <sup>nd</sup> Quarter	0.0338	0.0325	0.0077	0.0125	0.0032	0.05307
3 <sup>rd</sup> Quarter	0.0338	0.0325	0.0077	0.0125	0.0032	0.05307
4 <sup>th</sup> Quarter	0.0338	0.0325	0.0077	0.0125	0.0032	0.05307

### Actual Emisissions

	VOC	NO <sub>x</sub>	CO	PM10	SOx	CO <sub>2</sub> E
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter	Mt/quarter
1 <sup>st</sup> Quarter	340	327	78	126	32	534
2 <sup>nd</sup> Quarter	1309	1258	298	484	124	2055
3 <sup>rd</sup> Quarter	591	568	135	219	56	928
4 <sup>th</sup> Quarter	291	280	66	108	28	457
MT/year						<b>3,974</b>

### AQID

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	34	33	8	13	3
2 <sup>nd</sup> Quarter	131	126	30	48	12
3 <sup>rd</sup> Quarter	59	57	13	22	6
4 <sup>th</sup> Quarter	29	28	7	11	3

### Bankable Criteria Emission Reduction Credits

	VOC	NO <sub>x</sub>	CO	PM10	SOx
	lb/quarter	lb/quarter	lb/quarter	lb/quarter	lb/quarter
1 <sup>st</sup> Quarter	306	294	70	113	29
2 <sup>nd</sup> Quarter	1178	1133	268	436	112
3 <sup>rd</sup> Quarter	532	511	121	197	50
4 <sup>th</sup> Quarter	262	252	60	97	25

## **APPENDIX C**

### **Source Tests**



William Stone  
Compliance Team  
Leader

Health, Environmental &  
Safety  
Chevron North America  
Exploration and Production Co.  
P.O. Box 1392  
Bakersfield, CA 93302  
Tel 661-654-7582  
Fax 661-654-7133  
williamstone@chevron.com

June 24, 2008

Mr. Greg LaFore  
Senior Air Quality Inspector  
San Joaquin Valley APCD  
2700 M Street, Suite 275  
Bakersfield, CA 93301

DHL Delivery Confirmation  
# 27899677551

**Re: Cogen Compliance Test Results**

Dear Mr. LaFore:

Listed below are the results of the annual compliance tests conducted on May 13, 2008, for Chevron's cogen turbines in the North Midway Field. Test results and emission limits are summarized in the table below and in Project Report #104-5997.

SJVAPCD PTO Number	Chevron I.D. Number	Compliance Test Results		
		NO <sub>x</sub> ppm @ 15%	CO ppm @ 15%	SO <sub>x</sub> lb/hr
S-1129-53-10	CG-7	31.0	4.0	0.0
S-1129-54-11	CG-8	28.1	5.1	0.0
S-1129-55-10	CG-9	29.5	3.4	0.0
<b>Emission Sampling Limits</b>		<b>35</b>	<b>41</b>	<b>0.16</b>

Please contact me at (661) 654-7582 if you have any questions.

Sincerely,

William Stone  
Compliance Team Leader

Attachments



**AEROS ENVIRONMENTAL, INC.**

**Summary Of Results**

**Chevron U.S.A., Inc.  
North Midway Field  
Turbine CG-7**

**Project 104-5997  
May 13, 2008  
Permit No. S-1129-53-10**

Pollutant	ppm	ppm @ 15% O <sub>2</sub>	lb/hr	lb/MMBtu	Permit Limits
NOx	27.7	30.8	5.32	0.1126	
	28.0	30.8	5.32	0.1125	
	28.5	31.3	5.38	0.1145	
Mean	28.1	31.0	5.34	0.1132	35 ppm @ 15% O <sub>2</sub>
CO	3.6	4.0	0.42	0.0089	
	3.6	4.0	0.42	0.0088	
	3.6	4.0	0.41	0.0088	
Mean	3.6	4.0	0.42	0.0088	41 ppm @ 15% O <sub>2</sub>
Fuel Sulfur (SOx as SO <sub>2</sub> )	As H <sub>2</sub> S in Fuel Gas <1		As SO <sub>2</sub> in Stack Exhaust <0.007	As SO <sub>2</sub> in Stack Exhaust <0.0001	0.16 lb/hr
<b>Comments:</b> _____					

*Used  
For  
S-1129-53*

C-2

# AEROS ENVIRONMENTAL, INC.

## Summary Of Results

**Chevron U.S.A., Inc.  
North Midway Field  
Turbine CG-8**

**Project 104-5997  
May 13, 2008  
Permit No. S-1129-54-11**

Pollutant	ppm	ppm @ 15% O <sub>2</sub>	lb/hr	lb/MMBtu	Permit Limits
NOx	25.4	28.3	4.93	0.1036	
	25.2	28.1	4.71	0.1026	
	25.2	28.0	4.70	0.1024	
<b>Mean</b>	<b>25.3</b>	<b>28.1</b>	<b>4.78</b>	<b>0.1029</b>	<b>35 ppm @ 15% O<sub>2</sub></b>
CO	4.6	5.1	0.54	0.0114	
	4.6	5.1	0.52	0.0114	
	4.6	5.1	0.52	0.0114	
<b>Mean</b>	<b>4.6</b>	<b>5.1</b>	<b>0.53</b>	<b>0.0114</b>	<b>41 ppm @ 15% O<sub>2</sub></b>
<b>Fuel Sulfur (SOx as SO<sub>2</sub>)</b>	As H <sub>2</sub> S in Fuel Gas <b>&lt;1</b>		As SO <sub>2</sub> in Stack Exhaust <b>&lt;0.007</b>	As SO <sub>2</sub> in Stack Exhaust <b>&lt;0.0001</b>	<b>0.16 lb/hr</b>
<b>Comments:</b> _____					

*used for  
S-1129-54*

# AEROS ENVIRONMENTAL, INC.

## Summary Of Results

Chevron U.S.A., Inc.  
 North Midway Field  
 Turbine CG-9

Project 104-5997  
 May 13, 2008  
 Permit No. S-1129-55-10

Pollutant	ppm	ppm @ 15% O <sub>2</sub>	lb/hr	lb/MMBtu	Permit Limits
NOx	26.6	29.5	4.78	0.1079	
	26.6	29.4	4.74	0.1077	
	26.6	29.6	4.68	0.1083	
<b>Mean</b>	<b>26.6</b>	<b>29.5</b>	<b>4.73</b>	<b>0.1080</b>	<b>35 ppm @ 15% O<sub>2</sub></b>
CO	3.1	3.4	0.34	0.0077	
	3.2	3.5	0.35	0.0079	
	3.0	3.3	0.32	0.0074	
<b>Mean</b>	<b>3.1</b>	<b>3.4</b>	<b>0.34</b>	<b>0.0077</b>	<b>41 ppm @ 15% O<sub>2</sub></b>
<b>Fuel Sulfur (SOx as SO<sub>2</sub>)</b>	As H <sub>2</sub> S in Fuel Gas  <b>&lt;1</b>		As SO <sub>2</sub> in Stack Exhaust  <b>&lt;0.007</b>	As SO <sub>2</sub> in Stack Exhaust  <b>&lt;0.0001</b>	<b>0.16 lb/hr</b>
<b>Comments:</b> _____					

Used  
for  
S-1129-55

C-4



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



## HEALTHY AIR LIVING™

APR 03 2014

Gregory Pritchett  
Chevron U S A Inc  
PO Box 1392  
Bakersfield, CA 93302

**Re: Notice of Receipt of Complete Application - Emission Reduction Credits Banking**  
**Facility Number: S-1129**  
**Project Number: S-1122845**

Dear Mr. Pritchett:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) Banking resulting from the shutdown of North Midway gas turbine engines S-1129-53, '-54, and '-55 at your Western Heavy Crude Oil stationary source.

Based on this preliminary review, the application appears to be complete. However, during processing of your application, the District may request additional information to clarify, correct, or otherwise supplement, the information on file.

Pursuant to District Rule 3060, your application may be subject to an hourly Engineering Evaluation Fee. If the applicable fees exceed the submitted application filing fee, the District will notify you at the conclusion of our review.

Thank you for your cooperation. Should you have any questions, please contact Mr. Stephen Leonard at (661) 392-5605.

Sincerely,

David Warner  
Director of Permit Services

Leonard Scandura, P.E.  
Permit Services Manager

DW: spl

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



**JAN 17 2014**

Gregory Pritchett  
Chevron USA, Inc.  
P O Box 1392  
Bakersfield, CA 93302

**Re: Notice of Incomplete Application**  
**Project Number: S-1122845**

Dear Mr. Pritchett:

The District has received your Emission Reduction Credit application for criteria pollutant and CO<sub>2</sub>e emission reductions associated with the shutdown of three gas turbine engines at your North Midway Lease. Based on our preliminary review, the application remains incomplete. The following information is required prior to further processing:

Please provide additional information to demonstrate that the criteria pollutant emission reductions are permanent, and not replaced by emissions elsewhere, as requested in the District's August 17, 2012, letter (copy attached).

In response, please refer to the above project number, and send to the attention of Mr. Stephen Leonard. Please submit the requested information within 30 days. The District will not be able to process your application until this information is received.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Stephen Leonard at (661) 392-5605.

Sincerely,

David Wamer  
Director of Permit Services



Leonard Scandura, P.E.  
Permit Services Manager  
DW: spl

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

DEC 05 2013

Certified Mail

Gregory Pritchett  
Chevron USA Inc.  
PO Box 1392  
Bakersfeild, CA 93302

9171 9690 0935 0030 3019 83

**Re: Notice of Intent to Deny Application**  
**Project Number: S-1122845**

Dear Mr. Pritchett:

On July 18, 2012, the Air Pollution Control District received the above referenced Emission Reduction Credit (ERC) application criteria pollutant and CO2e emission reductions associated with the shutdown of three gas turbine engines, at your North Midway Lease. Following a preliminary review of the application, this office sent a list of deficiencies which were required to be corrected prior to further processing of your application (see attached copy). The District has not received the requested information as of the date of this letter.

In addition, we have determined that the following additional information is also necessary to allow us to continue to process your application:

1. Specify the geographic boundary in which the GHG emission reduction project is permanent.
2. Provide an explanation/justification of how the GHG emission reduction is permanent (i.e. not shifted to other equipment or processes) within the boundary of the emission reduction project.

If the requested items are not received by the District within 30 days, this office may deny your application for Authority to Construct. Receipt of the requested information, however, will enable the District to proceed with the processing of your application.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

DEC 05 2013

Mr. Gregory Pritchett  
Page 2

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Wamer  
Director of Permit Services

A handwritten signature in black ink, appearing to read 'L. Scandura', written over the typed name below.

Leonard Scandura, P.E.  
Permit Services Manager

DW:sl

Enclosures



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 17 2012

Jason H. Donchin  
P O Box 1392  
Bakersfield, CA 93302

**Re: Notice of Incomplete Application**  
**Project Number: S-1122845**

Dear Mr. Donchin:

The District has received your Emission Reduction Credit application for criteria pollutant and CO<sub>2</sub>e emission reductions associated with the shutdown of three gas turbine engines at your North Midway Lease. Based on our preliminary review, the application has been determined to be incomplete. The following information is required prior to further processing:

Please provide additional information to demonstrate that the criteria pollutant and greenhouse gas (GHG) emission reductions are permanent, and not replaced by emissions elsewhere. As you may know, the District is interested in working with interested stakeholders to develop applicable policies on the permanence of GHG emission reductions.

In response, please refer to the above project number, and send to the attention of Mr. Stephen Leonard. Please submit the requested information within 30 days. The District will not be able to process your application until this information is received.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Stephen Leonard at (661) 392-5605.

Sincerely,

David Warner  
Director of Permit Services

Leonard Scandura, P.E.  
Permit Services Manager  
DW: spl

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: (661) 392-5500 FAX: (661) 392-5585



## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Monday, July 14, 2014 11:00 AM  
**To:** OA-PublicNotices  
**Subject:** Final Notice for Chevron USA ERC Banking project S-1122845  
**Attachments:** S-1122845 FINAL public\_notice\_ERC & letters.doc; S-1122845 Newspaper notice for Final Decision in Bakersfield Californian and for posting on valleyair.docx

Tracking:	Recipient	Delivery	Read
	OA-PublicNotices		
	Song.Thao@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Aaron.LaMattina-old@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Diane.Gaitan@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Noemi.Calderon@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Carol.Flores@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Cristina.Padilla@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Yolanda.Alvarez@valleyair.org	Delivered: 7/14/2014 11:00 AM	
	Song Thao		Read: 7/14/2014 11:02 AM
	Cristina Padilla		Read: 7/14/2014 11:55 AM

Please retrieve and process the attached cover letter and public notice documents for the above mentioned project:

- Final notice cover letter and notice for applicant and Air Resources Board
- Final public notice for the Bakersfield Californian and District website

Also please print and prepare for signature and stamping, the finalized ERC banking certificates from Southern Region Project S-1129; 1122845:

S-4304-1 (VOC), '-2 (NOx), '-3 (CO), '-4 (PM10), '-5 (SOx), & '-24 (CO2e)

*Stephen P. Leonard*

Senior Air Quality Engineer

San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308-9725

Desk ph: 661-392-5605  
Main ph: 661-392-5500  
Main fax: 661-392-5585  
[steve.leonard@valleyair.org](mailto:steve.leonard@valleyair.org)

  
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**Steve Leonard**

---

**From:** Heather Heinks  
**Sent:** Wednesday, July 09, 2014 1:31 PM  
**To:** Leonard Scandura; Jaime Holt  
**Cc:** Steve Leonard; Richard Edgehill; Richard Karrs; Allan Phillips  
**Subject:** RE: 2 translation requests - High priority

Thanks Leonard, staff will get to work on it. We'll try to get it back to you tomorrow morning.

---

**From:** Leonard Scandura  
**Sent:** Wednesday, July 9, 2014 1:25 PM  
**To:** Jaime Holt; Heather Heinks  
**Cc:** Steve Leonard; Richard Edgehill; Richard Karrs; Allan Phillips  
**Subject:** 2 translation requests - High priority

Please assign the below highlighted portions of two public notices (see below) for translation into Spanish. We are ready to make our decisions on these projects once the public notices document are translated.

Please give me a call with any questions.

Thanks

Leonard Scandura  
Permit Services Manager  
661-392-5601

---

Aviso en Español for posting on Valleyair.org

**AVISO DE UNA DECISION FINAL  
PARA LA OTORGACIÓN DE UNA AUTORIDAD PARA CONSTRUIR Y  
LA PROPUESTA MODIFICACIÓN SIGNIFICATIVA DE UN PERMISO MANDATORIO FEDERAL  
PARA OPERAR**

POR EL PRESENTE SE NOTIFICA que el Distrito para el Control de la Contaminación del Aire del Valle de San Joaquín ha tomado la decisión final para otorgar una Autoridad para Construir a Chevron USA Inc .....

El análisis del Distrito de los fundamentos jurídicos y fácticos de esta acción propuesta, Número del Proyecto #1141623 (S-2010) and 1141607 (S-1128), está disponible para la inspección del público en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUÍN, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500.

**NOTICE OF FINAL DECISION  
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND  
THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY  
MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue Authorities to Construct to Chevron USA Inc for at their light and heavy oil production stationary sources in the western Kern County oilfields. The project authorizes a new flare with emissions increases of 4,080 lb/yr NOx and 3,780 lb/yr VOC.

No comments were received following the District's preliminary decision on this project.

The District's analysis of the legal and factual basis for this proposed action, project #1141623 (S-2010) and 1141607 (S-1128), is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.

---

**AVISO DE DECISIÓN FINAL  
PARA LA OTORGACIÓN DE  
CERTIFICADOS DE REDUCCIÓN DE EMISIONES**

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a Chevron USA, Inc. por la reducción de emisiones generadas por .....

No se recibieron comentarios acerca de este proyecto despues del aviso de decision preliminar del Distrito.

La revisión de la solicitud del Proyecto #S-1122845 está disponible para la inspección del público en [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUIN, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (661) 392-5500.

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Chevron USA, Inc. for emission reductions generated by the shutdown of three gas turbine engines, at the North Midway Cogeneration facility in your western Kern County heavy oil production source. The quantity of ERCs to be issued is 9,447 lb-NOx/yr, 51 lb-SOx/yr, 3,388 lb-PM10/yr, 6,356 lb-CO/yr, 1,077 lb-VOC/yr and 30,279 metric tons CO2e/yr.

No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1122845 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm), the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.

## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Wednesday, July 09, 2014 1:17 PM  
**To:** Leonard Scandura  
**Subject:** Public notice for Final Decision on Chevron USA ERC Banking Project S1122845  
**Attachments:** S-1122845 Newspaper notice for Final Decision in Bakersfield Californian and for posting on valleyair.docx

Please forward the attached public/website notice to OC for Spanish translation. Thank you.

*Stephen P. Leonard*  
**Senior Air Quality Engineer**

San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308-9725

Desk ph: 661-392-5605  
Main ph: 661-392-5500  
Main fax: 661-392-5585  
[steve.leonard@valleyair.org](mailto:steve.leonard@valleyair.org)



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## Steve Leonard

---

**From:** Diane Gaitan  
**Sent:** Wednesday, May 28, 2014 9:25 AM  
**To:** Steve Leonard  
**Subject:** Prelim S-1129 S-1122845

Hi Stephen,

I am currently processing your notice in Song's absence. Please forward the newspaper notice and aviso to ensure proper processing.

Thank you,

***Diane M. Gaitan***

San Joaquin Valley Air Pollution Control District

Voice: (559) 230-6000

Fax: (559) 230-6061

E-mail: [diane.gaitan@valleyair.org](mailto:diane.gaitan@valleyair.org)

Service Teamwork Attitude Respect



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## Steve Leonard

---

**From:** Song Thao  
**Sent:** Tuesday, May 27, 2014 3:21 PM  
**To:** Homero Ramirez; OA-PublicNotices  
**Cc:** Steve Leonard; Leonard Scandura  
**Subject:** RE: Public Notice - Preliminary Decision for ERC Project (S-1129/S-1122845)

Rec'd and will process. Thank you.

---

**From:** Homero Ramirez  
**Sent:** Tuesday, May 27, 2014 3:02 PM  
**To:** OA-PublicNotices  
**Cc:** Steve Leonard; Leonard Scandura  
**Subject:** Public Notice - Preliminary Decision for ERC Project (S-1129/S-1122845)

Good afternoon.

On behalf of Steve Leonard (who is on vacation), attached are files for the Preliminary Decision for his Emission Reduction Credits project (S-1129/S-1122845) for processing and for Arnaud's signature. The Evaluation, its appendices, Preliminary Decision Letter, Newspaper Notice, District Website Notice, and a Checklist are attached.

Please let me know if you have any questions.

Thank you.

Homero Ramirez  
San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308  
Tel. (661) 392-5616  
Fax (661) 392-5585



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## Steve Leonard

---

**From:** Homero Ramirez  
**Sent:** Tuesday, May 13, 2014 4:26 PM  
**To:** Steve Leonard  
**Subject:** RE: S-1122845 prelim-public\_notice\_ERC & letters.doc  
**Attachments:** S-1122845 prelim-public\_notice\_ERC letters - Spanish.doc

Steve,

The Spanish translation is attached. Let me know if you have any questions.

Homero Ramirez  
San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308  
Tel. (661) 392-5616  
Fax (661) 392-5585

  
**HEALTHY AIR LIVING**  
[www.healthyairliving.com](http://www.healthyairliving.com)

**Make one change for clean air!**

---

**From:** Steve Leonard  
**Sent:** Tuesday, May 13, 2014 3:43 PM  
**To:** Homero Ramirez  
**Subject:** S-1122845 prelim-public\_notice\_ERC & letters.doc

Would you please translate the Spanish portion for this ERC preliminary decision. Thanks, Homero.

*Stephen P. Leonard*  
Senior Air Quality Engineer  
Southern Region  
x5605



## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Friday, February 14, 2014 8:03 AM  
**To:** Leonard Scandura; Richard Karrs  
**Cc:** Allan Phillips  
**Subject:** FW: Chevron USA CO2e Banking Project S-1122845

Tracking:	Recipient	Delivery
	Leonard Scandura	Delivered: 2/14/2014 8:03 AM
	Richard Karrs	Delivered: 2/14/2014 8:03 AM
	Allan Phillips	Delivered: 2/14/2014 8:03 AM

The examples of project Lance references are accurate. Do we want to continue down that path in regards to permanence?

*Stephen P. Leonard*  
Senior Air Quality Engineer  
Southern Region  
x5605

---

**From:** Ericksen, Lance [mailto:Lance.Ericksen@chevron.com]  
**Sent:** Friday, February 14, 2014 7:39 AM  
**To:** Steve Leonard  
**Subject:** RE: CO2e Banking Project S-1122845

Thanks I see this is different than the August 17, 2012 request. We did address this on page 5 of the original application but it is quite brief. To clarify there are no other turbines at this site so there will be no switching between units performing the same task at the same location. The turbines have been removed from service and we surrender the permits for banking. To go beyond this exceeds the scope of the banking. Any new emission units that take the place of the turbines will need to be permitted by the District and satisfy all NSR requirements.

Chevron recently banked emission for an identical project in the Kern River Oilfield (S-1105004). The conclusion for permanency of the criteria credits (page 22 of the Districts analysis) was:


The applicant has removed the units from service and surrendered the PTO's. Therefore, the AER is permanent.

This has been the conclusion for other projects as well.

We are not aware of any comments received on this project or any other project that would necessitate a change in determining that criteria emission reductions for units that are shutdown are permanent and qualify for banking.

I trust this will satisfy your concerns for project S-1122845.

**Lance Ericksen**  
Health, Environment, and Safety Specialist/Engineer

 **Chevron**  
Chevron North America Exploration and Production Company  
San Joaquin Valley Business Unit (SJVBU)  
9525 Camino Media (C-1035)  
Bakersfield, CA 93311  
Office: (661) 654-7145

Mobile: (661) 864-5273  
Fax: (661) 654-7606  
[Lance.Ericksen@chevron.com](mailto:Lance.Ericksen@chevron.com)

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---

**From:** Steve Leonard [<mailto:Stephen.Leonard@valleyair.org>]  
**Sent:** Thursday, February 13, 2014 12:44 PM  
**To:** Ericksen, Lance  
**Subject:** RE: CO2e Banking Project S-1122845

The information we received from Chevron on December 20, 2013, was a response explaining how the greenhouse gas reduction should be considered surplus when considering California as the boundary. The District's information request dated January 17, 2014, was more narrow in scope, requesting information pertaining to the permanence of the criteria pollutant reductions (NOx, SOx, PM10, VOC, CO) with regards to Rules 2201 and 2301.

Stephen P. Leonard  
Senior Air Quality Engineer  
Southern Region  
x5605

-----Original Message-----

**From:** Ericksen, Lance [<mailto:Lance.Ericksen@chevron.com>]  
**Sent:** Tuesday, February 11, 2014 7:28 AM  
**To:** Steve Leonard  
**Subject:** CO2e Banking Project S-1122845

I received a letter dated January 17, 2014 asking for information to show the emissions reductions are permanent as requested in the District's August 17, 2012 letter. We submitted the attached response on December 20, 2013 that provided the information requested in the August 17, 2012 letter. I trust this is the information you needed and we just missed connections somewhere. Please let me know if this is not the case.

Thanks

Lance Ericksen  
Health, Environment, and Safety Specialist/Engineer

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**From:** 001BK9525@chevron.com [mailto:001BK9525@chevron.com]

**Sent:** Tuesday, February 11, 2014 7:15 AM

**To:** Ericksen, Lance

**Subject:** Scanned from a Xerox Multifunction Device

Please open the attached document. It was scanned and sent to you using a Xerox Multifunction Device.

**Attachment File Type:** pdf, Multi-Page

**Multifunction Device Location:**

**Device Name:** XRX9C934E2FEA82

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For Service or Supplies please contact the Central IT Help Desk at 8765

## Steve Leonard

---

**From:** Ericksen, Lance <Lance.Ericksen@chevron.com>  
**Sent:** Friday, February 14, 2014 7:39 AM  
**To:** Steve Leonard  
**Subject:** RE: CO2e Banking Project S-1122845

Thanks I see this is different than the August 17, 2012 request. We did address this on page 5 of the original application but it is quite brief. To clarify there are no other turbines at this site so there will be no switching between units performing the same task at the same location. The turbines have been removed from service and we surrender the permits for banking. To go beyond this exceeds the scope of the banking. Any new emission units that take the place of the turbines will need to be permitted by the District and satisfy all NSR requirements.

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**Lance Ericksen**  
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**To:** Ericksen, Lance  
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Stephen P. Leonard  
Senior Air Quality Engineer  
Southern Region  
x5605

-----Original Message-----

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To: Steve Leonard  
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Health, Environment, and Safety Specialist/Engineer

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## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Tuesday, February 11, 2014 7:33 AM  
**To:** Leonard Scandura  
**Subject:** FW: CO2e Banking Project S-1122845  
**Attachments:** Scanned from a Xerox Multifunction Device.pdf

From Lance;

Stephen P. Leonard  
Senior Air Quality Engineer  
Southern Region  
x5605

-----Original Message-----

**From:** Ericksen, Lance [<mailto:Lance.Ericksen@chevron.com>]  
**Sent:** Tuesday, February 11, 2014 7:28 AM  
**To:** Steve Leonard  
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## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Tuesday, January 07, 2014 10:30 AM  
**To:** Leonard Scandura  
**Subject:** Chevron turbine ERC (GHG + criteria)

Tracking:	Recipient	Delivery
	Leonard Scandura	Delivered: 1/7/2014 10:30 AM

Would the "boundary" approach to permanence apply to criteria pollutants as well as GHG? Chevron claims the reductions to be permanent though they admit in their application that some heat from the turbines could be replaced by other units operating within their NSR limits. Dave's 11/08/2005 email on permanence seems to dispute this.

*Stephen P. Leonard*

Senior Air Quality Engineer

San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
desk ph: 661-392-5605  
main ph: 661-392-5500  
[steve.leonard@valleyair.org](mailto:steve.leonard@valleyair.org)

  
**HEALTHY AIR LIVING**  
[www.healthyairliving.com](http://www.healthyairliving.com)

Make one change for clean air!

## Steve Leonard

---

**From:** Steve Leonard  
**Sent:** Monday, December 16, 2013 8:43 AM  
**To:** 'Ericksen, Lance'  
**Subject:** RE: Attached Image; Intent to Deny ERC project S-1122845  
**Attachments:** 2022\_001.pdf

Here you go, it's been awhile.

*Stephen P. Leonard*  
Senior Air Quality Engineer  
Southern Region  
x5605

---

**From:** Ericksen, Lance [<mailto:Lance.Ericksen@chevron.com>]  
**Sent:** Monday, December 16, 2013 8:27 AM  
**To:** Steve Leonard  
**Subject:** RE: Attached Image; Intent to Deny ERC project S-1122845

Thanks I hope to have a response back this week.

I don't seem to have the original additional info request. Could you send me a copy.

Thanks

---

**From:** Steve Leonard [<mailto:Stephen.Leonard@valleyair.org>]  
**Sent:** Monday, December 16, 2013 7:40 AM  
**To:** Ericksen, Lance  
**Subject:** FW: Attached Image; Intent to Deny ERC project S-1122845

Lance;

Steve Davidson says you got a bad copy of this intent to deny letter. Here's a clean copy, albeit slightly crooked. I understand Chevron had commented on some similar projects recently.

*Stephen P. Leonard*  
Senior Air Quality Engineer

San Joaquin Valley Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
desk ph: 661-392-5605  
main ph: 661-392-5500  
[steve.leonard@valleyair.org](mailto:steve.leonard@valleyair.org)



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**From:** SouthCopier  
**Sent:** Monday, December 16, 2013 7:32 AM

**To:** Steve Leonard  
**Subject:** Attached Image