

PETITION FOR A HEARING
BEFORE THE HEARING BOARD OF THE
SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

☐ Northern Region Office
4800 Enterprise Way
Modesto, CA 95356

☐ Central Region Office
1990 E. Gettysburg Ave.
Fresno, CA 93726

☒ Southern Region Office
34946 Flyover Court
Bakersfield, CA 93308

TYPE OF HEARING

FEES (Non-Refundable)

☐ A.	Short Variance (90 Days or Less)	\$ 987.00
☐ B.	Interim & Short Variance	\$1443.00
☒ C.	Emergency Variance	\$ 343.00
☐ D.	Regular Variance	\$1136.00
☐ E.	Interim & Regular Variance	\$1592.00
☐ F.	Appeal Hearing	\$1136.00
☐ G.	Extension of Variance	\$ 456.00
☐ H.	Modification of Variance	\$ 456.00
☐ I.	Modification of Variance Schedule of Progress	\$ 456.00
☐ J.	Product Variance	\$1515.00
☐ K.	Rehearing	\$1136.00
☐ L.	Revocation of Variance	\$ 456.00
☐ M.	Special Hearing	\$1136.00

In addition to the filing fee above, an excess emissions fee will be assessed at the conclusion of the variance at \$3.00 per pound on the excess emissions emitted during the variance period. Additionally, a \$3.75 per pound mitigation fee will be assessed if excess emissions are greater than 2000 pounds.

A. NAME OF FACILITY: Elk Hills Power, LLC

PHYSICAL ADDRESS OF FACILITY: 4026 Skyline Road

CITY: Tupman STATE: CA ZIP CODE: 93276

NAME OF PERSON FILLING OUT PETITION: Sonnie Pineda

TELEPHONE: (661) 770-6051 **E-MAIL:** Sonnie.Pineda@crc.com

NAME OF PERSON AUTHORIZED TO RECEIVE NOTICES: Brandon Myers

MAILING ADDRESS: 9600 Ming Ave

CITY: Bakersfield STATE: CA ZIP CODE: 93311

TELEPHONE: (661) 213-8248 **E-MAIL:** Brandon.Myers@crc.com

B. TYPE OF ENTITY (Check One)

☐ LLC

☐ Partnership

☒ Corporation

☐ Other Entity

Please include the name, title, and address of officers, if a corporation; partners, if a partnership; or the person(s) in control, if other entity.

(Attach additional sheets, if needed)

NAME	TITLE	ADDRESS
Jonathan Hilton	VP Operations	same as above

In accordance with State Law, the District will provide assistance to small businesses in preparing and filing the petition for the hearing. Small business has the same meaning as defined in the Small Business Administration, except that no stationary source which is a major source can be a small business.

If you plan on having attendees participate via the video teleconferencing system in a region other than that of which you filed the petition, please check the box(s) below for the region they will be participating:

☒ Bakersfield

☐ Fresno

☐ Modesto

1. Describe the type of business conducted at your facility.

Elk Hills Power, LLC is a nominal 550 MW, natural gas fired cogeneration power plant in western Kern County, approximately 25 miles west of Bakersfield, CA. The facility operates two GE7241 FA natural gas turbines with a steam turbine and heat recovery steam generators with supplemental duct burners and selective catalytic reduction. The facility supplies electricity to California Electrical grid and to the Elk Hills oil field.

2. Describe in detail the equipment or activity that is the subject of this petition, what the equipment is used for, and why it is necessary to the operation of your facility. Include all pertinent information necessary to describe the activity including: fuels burned, raw materials processed, product produced, true vapor pressure of all volatile organic compounds, site diagrams, material flow charts, fuel systems, and diagrams of air pollution control systems if necessary. Provide photos as well.

Combustion Turbine Unit 1 (CTG1), Permit S-3523-1-13, and Combustion Turbine Unit 2 (CTG2), Permit S-3523-2-13, are utilized to generate electrical power, which is the facility's primary business function. During a recent maintenance outage, the turbine fuel gas control valve was upgraded. Following the successful startup of the unit, the Original Equipment Manufacturer (OEM) performed the required tuning of the fuel gas control valve system. During the tuning process, however, an issue was encountered in which the unit did not respond properly to the input program, resulting in emissions exceeding the permitted limit.

3. List all the District Permits to Operate and/or Authorities to Construct and the corresponding permit conditions for which you are requesting variance protection and **explain** how you are violating, or will violate the condition(s). Please list the current version(s).

CT1 and CT2 fuel gas control valve must be re-tuned and evaluated after the upgrade. The tuning will be performed by the equipment manufacturer, General Electric. Elk Hills Power seeks relief for the following permit conditions: S-3523-1-13 and S-3523-2-13 Rule # 26, 27, and 28.

a) Condition No 26: Emission rates from CTG/HRSG except during startup, shutdown or aborted shutdown, shall not exceed any of the following: PM10 -15.0 lb/hr, SOx -3.6 lb/hr, NOx -15.8 lb/hr and 2.5 ppmvd @15% O2 VOC - 4.0 lb/hr and 2.0 ppmvd @15% O2, CO -12.5 lb/hr and 4 ppmvd @15% O2, ammonia -10 ppmvd @15%O2. NOx ppmv and lb/hr limits are a one-hour rolling average. Ammonia emission limit is a twenty-four hour rolling average. All other ppmv and lb/hr limits are three hour rolling averages. The emission rate from each CT will exceed the NOx hourly limit as the facility experience on May 16 and 17, 2026 tuning event and the NH3Slip daily limit when a difficulties encountered during the tuning process.

b) Condition No 27: Emission rates from CTG/HRSG shall not exceed any of the following: PM10-360 lb/day, SOx -86.4 lb/day, NOx- 752 lb/day, VOC - 184 lb/day,band CO 3948.0 lb/day. It is possible that the emission rate from each CT will exceed the daily limit when a difficulties encountered during the tuning process.

f) Condition No 28: Emission rates from both CTG/HRSG S-3523-1 and -2 combined shall not exceed any of the following: PM10 720.0 lb/day, SOx -172.8 lb/day, NOx - 1103 lb/day VOC-269 lb/day, and CO -4297 lb/day. It is possible that the emission rate from each CT will exceed the daily limit when a difficulties encountered during the tuning process.

4. List all District Rule numbers, including subsections, for which you are requesting variance protection and **explain** how you are violating or will violate the rule(s).

Combustion Turbine Units CT1 and CT2 require fuel gas control valve tuning and evaluation following the recent control valve upgrade. The tuning activities will be performed by the equipment manufacturer, General Electric (GE). Elk Hills Power (EHP) seeks temporary relief from the following permit conditions under Permits S-3523-1-13 and S-3523-2-13: Conditions No. 26, 27, and 28.

a) Condition No. 26 EHP seeks relief from the CTG/HRSG emission limits for NOx and CO established under Permit Condition No. 26 and District Rules 2201, 4001, and 4703. The permitted emission limits are as follows:

NOx: 15.8 lb/hr and 2.5 ppmvd @ 15% O₂ (1-hour rolling average)
CO: 12.5 lb/hr and 4 ppmvd @ 15% O₂
NH3Slip: 10 ppmvd @15%O2 (24-hr rolling average)

During the fuel gas control valve tuning process, the unit must reduce MW load after initially achieving permit compliance limits in order to properly tune the valve response. These load reductions and operational adjustments may result in temporary increases in NOx and/or CO emissions above the hourly permitted limits, similar to the events experienced on May 16 and 17, 2026.

b) Condition No. 27 EHP seeks relief from the CTG/HRSG daily emission limit of 752 lb/day NOx as NO₂ established under Permit Condition No. 27 and District Rule 2201. Based on excess emission data recorded during the May 16 and 17, 2026 tuning activities at approximately 10:00 PM on CT1, EHP anticipates that NOx emissions during the tuning process could reach a worst-case scenario of approximately 805 lb/day above the permitted daily limit.

c) Condition No. 28 EHP seeks relief from the combined CTG/HRSG daily emission limit applicable to Permits S-3523-1-13 and S-3523-2-13 of 1,103 lb/day NOx as NO₂ pursuant to Permit Condition No. 28 and District Rule 2201. Based on the excess emissions observed during the May 16 and 17, 2026 CT1 tuning events, EHP anticipates that combined NOx emissions from both units could reach a worst-case scenario of approximately 1,185 lb/day above the permitted daily limit during the tuning activities.

5. Why is it beyond your reasonable control to comply with the rule(s) and/or permit condition(s)?

Due to the Original Equipment Manufacturer (OEM) testing requirements following the upgrade of each unit's fuel gas control valve, the valve must be tuned in accordance with the manufacturer's prescribed procedures to ensure personnel safety, equipment reliability, operational performance, and compliance with emission performance guarantees. During the tuning process, the unit may experience operational instability or malfunction, as occurred on May 16 and 17, 2026, at approximately 10:00 PM, which resulted in emissions exceeding the permitted limits.

6. What would be the harm to your business if the variance were not granted? Include business closure, economic losses in dollar amounts, breach of contracts, hardships on customers, employee lay-offs, loss of market share to competitors, etc.

If the requested variance is not granted, the facility may incur multiple violations of District permit limits, which could result in enforcement actions including substantial monetary penalties and/or suspension or revocation of the facility's Permit to Operate (PTO). Such actions could ultimately require the facility to shut down operations temporarily until the required tuning activities are completed and compliance is re-established.

A shutdown of the facility would result in a significant loss of electrical generation and natural gas sales revenue, estimated at approximately \$490,000 per day, or approximately \$1.96 million over a four-day period. In addition, both the facility and the associated oil and gas field operations would be required to purchase replacement electrical power from external sources while the units are offline.

The loss of facility-generated electrical power could also adversely impact electricity consumers through increased energy costs and reduced power availability during periods when the facility is unable to operate.

7. What date, and under what circumstances, did your facility first become aware that it would **not** be in compliance?

During the tuning process for CT1 on May 16 and 17, 2026, an operational issue was encountered that caused the unit to not respond properly to the tuning inputs, resulting in emissions exceeding the permitted limits.

8. What actions have you taken since that time to achieve compliance?

The tuning process is postponed until the variance is obtained.

9. Explain what options have been evaluated towards curtailment or termination of operations in lieu of obtaining a variance.

Shutting down all power-generating units at the facility until the requested variance is granted would require the facility to purchase replacement electrical power, incur penalties associated with gas purchase agreements, and experience substantial revenue losses due to non-operation. In addition, there are no feasible alternative methods to perform the required fuel gas control valve tuning process while the units are offline, as the tuning activities must be conducted under operating conditions in accordance with OEM procedures. The facility's primary business function depends on the operation of these units to generate electrical power.

10. Estimate the excess emissions in total pounds over the duration of the variance period. *Estimate the maximum amount of excess emissions that will occur.*

Pollutant	Pollutant Limit	Actual Emissions	Excess emissions are those that are in excess of the rules or permit conditions or otherwise lawfully allowed	Total Estimated Excess Emissions
VOC				
NO _x	15.8 / 752/ 1103	16.1/ 805/ 1185		0.3/ 53 / 82
CO	12.5	0		0
NH ₃ Slip	10 ppm	14 ppm		4 ppm
PM ₁₀				
PM _{2.5}				

Highest Opacity level anticipated: _____ %

11. Show all calculations and provide references for emission factors used in estimating excess emissions.

CT1 Normal operations 24 hrs (15.8 lb/hr) = 380 lb NO_x

CT1 Start up emission if the unit tripped offline during tuning process:

(157.3 lb x 3 hrs) = 471.9 lb for 3 hrs

Total Emission if restart occurred (15.8 lb/hr x 21hr) + (157.3 lb/hr x 3hr) = 804.5 lb/day

May 16, 2026 at 10PM data = 16.1 lb/hr (above permit limit see attached emission data)

May 17, 2026 at 10PM data = 15.9 lb/hr (above permit limit see attached emission data)

Combined Unit, one unit on operation while other is being tuned:

CT1 = 380 lb/day NO_x

CT2 = 804.5 lb/day NO_x (assumed tripped offline and restart occurred)

Combined Emission total = 380 lb/day + 804.5 lb/day = 1184.5 lb/day

*For CO, even though the facility have not seen a CO increase on hourly data, the facility request a relief on the 3-hour rolling permit limit.

*For NH₃Slip, due to minimizing the excess of NO_x, the ammonia slip (NH₃Slip) is reaching the permit limit and may reached up to 14ppm for the 24hr average. see attached data

12. Explain how you can reduce or mitigate excess emissions during the variance period. (such as shutting equipment down or reducing production to offset excess emissions)

The SCR is in service as soon as the unit SCR temperature reaches 500 deg F per permit condition. However, the NH3Slip pollutant is affected which increases as the ammonia is injected into the SCR system.

13. If there are excessive hazardous or toxic emissions, attach a health risk assessment and receptor modeling data.

14. Can you monitor or quantify emission levels from the subject equipment or activity during the variance period and make such records available to the District? Source tests, engineering tests, or portable emission analyzers can be utilized.
Yes: ☒ No: ☐ Provide an explanation of your response.

CEMS will be on operation during the tuning process and the data will be available for inspection by the district.

15. How do you intend to achieve compliance with the rules or permit conditions? Include a detailed description of any equipment to be installed and/or modifications to be made, a listing of the dates by which the actions will be completed, and an estimate of the total cost, if available.

Continuous Emissions Monitoring Systems (CEMS) are already installed and operational on the units. In addition, the Selective Catalytic Reduction (SCR) systems are fully installed and functional. Ammonia injection will be conducted in accordance with the facility's standard startup procedures and permit requirements to minimize excess emissions during the tuning process. And Ammonia Slip minimization is being carefully observed and the valves are adjusted to minimize the exceedance of NH3Slip.

16. State the dates you are requesting the variance to begin and end (the end date should be the date you expect to achieve compliance with the rules, regulations, and permit conditions). Please overestimate the time needed to allow for any contingencies.

Begin variance: 05/16/2026 End variance: 06/18/2026

17. Please state if you need special time designations. For example: "*We need 15 non-consecutive days between such and such date.*"

We need four (4) non-consecutive days between May 18, 2026 and June 18, 2026

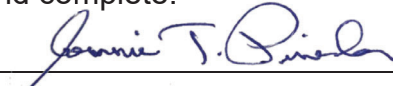
18. If a variance, or series of variances, is to extend beyond one year, you must attach a Schedule of Increments of Progress pursuant to Rule 5050 –*Compliance Schedule* which must specify certain dates or milestones to be met in achieving compliance.

19. List the names of any District personnel who are familiar with the facility (inspectors, permit engineers, etc.) or with whom facility representatives have had contact concerning this variance petition, or any related NOV or NTC.

Karen Russel

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete:

Date: 05/18/2026

*Signature: 

Title: Sr. HSE Advisor

Print Name: Sonnie Pineda

**must be signed by a responsible official if petitioner is a Title V source*

The original petition in this format, and any attachments must be submitted to the District. Any attachments that are extraordinarily difficult to reproduce, such as full color photographs, must be submitted as six copies. Petitions which are incomplete, illegible, submitted in the wrong format, or without the necessary filing fee will be returned. If you need assistance completing this petition and/or developing a compliance schedule, contact the Compliance Department in your region.

Northern Region Office
(209) 557-6440

Central Region Office
(559) 230-5950

Southern Region Office
(661) 392-5540

You may hand deliver, mail, or email this petition to variance@valleyair.org

CTG1 Daily Average

Plant: ELK HILLS POWER, LLC

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 05/16/2026 00:00 Through 05/16/2026 23:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit	CTG1						
	CGASFLOW (HSCFH)	NMCO#HR (LB/HR)	NMCOCORR (PPM)	NMNH3COR (PPM)	NMNOX#HR (LB/HR)	NMNOXCOR (PPM)	O2 (PERCENT)
05/16/26 00:00	1.2F	0.0F	-9.0F	0.0F	0.0FI	1.0FI	21.0F
05/16/26 01:00	1.2F	0.0F	-9.7F	0.0F	0.0FI	0.9FI	21.0F
05/16/26 02:00	1.2F	0.0F	-10.7F	0.0F	0.0FI	1.0FI	21.0F
05/16/26 03:00	1.2F	0.0F	-12.2F	0.0F	0.0FI	1.1FI	21.0F
05/16/26 04:00	1.2F	0.0F	-12.9F	0.0F	0.0FI	1.0FI	21.0F
05/16/26 05:00	1.2F	0.0F	-4.1F	0.0FC	0.0FI	1.0FI*	20.9F
05/16/26 06:00	1.2F	0.0FC	7.0FC	0.0FC	0.0FIC	4.5FI*	17.8FC
05/16/26 07:00	3,817.3	33.1FCU	34.6FCU	-62.7F°C	81.2FIC	50.6FI*	17.1C
05/16/26 08:00	5,019.6	44.6FU	36.1FU	12.0FU	108.5FIU	53.7FIU	17.8
05/16/26 09:00	5,124.9	78.8FU	62.9FU	-8.0FU	130.3FIU	63.3FIU	17.8
05/16/26 10:00	6,202.1	62.5FU	41.4FU	-2.3FU	157.3FIU	63.3FIU	15.9
05/16/26 11:00	12,756.0	9.0FU	5.0FU	7.0FU	70.7FIU	18.2FIU	13.7
05/16/26 12:00	11,336.7	3.7FU	6.5FU	3.7FU	11.1FIU	3.8FIU	13.8
05/16/26 13:00	1.7F	0.0F	0.1F	0.0F	0.0FI	0.0FI	20.8F
05/16/26 14:00	5,344.2	23.9FCU	16.9FCU	-49.5FCU	57.1FIC	24.4FIC	16.2C
05/16/26 15:00	14,245.8	3.9FU	2.2FU	3.2FCU	51.1FIU	12.3FIU	13.6
05/16/26 16:00	15,368.8	0.0U	0.0U	10.1U	15.2U	2.4U	13.3
05/16/26 17:00	16,308.7	0.0	0.0	8.7	15.4	2.3	13.2
05/16/26 18:00	16,308.6	0.0	0.0	8.7	15.1	2.3	13.2
05/16/26 19:00	16,308.5	0.0	0.0	8.9	14.8	2.3	13.2
05/16/26 20:00	16,308.5	0.0	0.0	8.8	15.0	2.3	13.2
05/16/26 21:00	16,308.4	0.0	0.0	8.5	15.8	2.4	13.2
05/16/26 22:00	16,308.3	0.0	0.0	8.4	16.1E	2.4	13.2
05/16/26 23:00	16,308.2	0.0	0.0	9.4	15.4	2.3	13.2
Average	12,085.9	0.0	0.0	8.9	15.4	2.3	14.5
Minimum	3,817.3	0.0	0.0	8.4	14.8	2.3	13.2
Maximum	16,308.7	0.0	0.0	10.1	16.1	2.4	17.8
Summation	193,374.6	0.0	0.0	71.5	122.8	18.7	231.6
Included Data Points	16	8	8	8	8	8	16
Total number of Data Points	24	24	24	24	24	24	24

F = Unit Offline **E = Exceedance** **C = Calibration** **S = Substituted** **I = Invalid**
M = Maintenance **T = Out Of Control** *** = Suspect** **U = Startup** **D = Shutdown**

Report Generated: 05/17/26 00:11

CTG1 Daily Average

Plant: ELK HILLS POWER, LLC

Interval: 1 Hour

Type: Roll with BAF Applied

Report Period: 05/17/2026 00:00 Through 05/17/2026 23:59

Time Online Criteria: 1 minute(s)

Source Parameter Unit	CTG1						
	CGASFLOW (HSCFH)	NMCO#HR (LB/HR)	NMCOCORR (PPM)	NMNH3COR (PPM)	NMNOX#HR (LB/HR)	NMNOXCOR (PPM)	O2 (PERCENT)
05/17/26 00:00	16,308.2	0.1	0.0	9.2	15.4	2.3	13.2
05/17/26 01:00	16,308.1	0.0	0.0	9.5	14.7	2.2	13.2
05/17/26 02:00	16,308.1	0.0	0.0	9.5	14.5	2.2	13.2
05/17/26 03:00	16,308.1	0.0	0.0	9.6	14.1	2.1	13.2
05/17/26 04:00	16,308.2	0.0	0.0	9.4	14.0	2.1	13.2
05/17/26 05:00	16,306.3	0.0	0.0	9.2C	14.5	2.2	13.2
05/17/26 06:00	16,220.1	0.0C	0.0C	9.9C	14.4C	2.2C	13.2C
05/17/26 07:00	16,190.6	0.0	0.0	9.8	13.9	2.1	13.2
05/17/26 08:00	16,305.5	0.0	0.0	10.1	15.4	2.3	13.3
05/17/26 09:00	16,235.2	0.0	0.0	10.6	15.7	2.4	13.3
05/17/26 10:00	15,861.1	0.0	0.0	10.6	14.6	2.3	13.2
05/17/26 11:00	14,762.6	0.0	0.0	12.3	12.8	2.1	13.1
05/17/26 12:00	14,693.5	0.0	0.0	12.4	12.7	2.1	13.1
05/17/26 13:00	15,186.6	0.0	0.0	11.2	13.9	2.3	13.1
05/17/26 14:00	16,208.1	0.0	0.0	10.8	15.0	2.3	13.3
05/17/26 15:00	16,242.3	0.0	0.0	10.2	14.8	2.3	13.2
05/17/26 16:00	16,306.1	0.0	0.0	10.3	15.0	2.3	13.2
05/17/26 17:00	16,308.4	0.0	0.0	9.5	15.3	2.3	13.2
05/17/26 18:00	16,308.2	0.0	0.0	8.8	15.8E	2.4	13.2
05/17/26 19:00	16,307.9	0.0	0.0	8.9	15.3	2.3	13.2
05/17/26 20:00	16,307.8	0.0	0.0	9.1	15.6	2.4	13.2
05/17/26 21:00	16,307.8	0.0	0.0	9.4	15.6	2.4	13.2
05/17/26 22:00	16,307.7	0.1	0.0	9.5	15.9E	2.4	13.2
05/17/26 23:00	16,307.6	0.3	0.1	10.1	15.2	2.3	13.2
Average	16,092.3	0.0	0.0	10.0	14.8	2.3	13.2
Minimum	14,693.5	0.0	0.0	8.8	12.7	2.1	13.1
Maximum	16,308.4	0.3	0.1	12.4	15.9	2.4	13.3
Summation	386,214.1	0.5	0.1	239.9	354.1	54.3	316.8
Included Data Points	24	24	24	24	24	24	24
Total number of Data Points	24	24	24	24	24	24	24

F = Unit Offline **E = Exceedance** **C = Calibration** **S = Substituted** **I = Invalid**
M = Maintenance **T = Out Of Control** *** = Suspect** **U = Startup** **D = Shutdown**

Report Generated: 05/18/26 00:11