

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

☐ Northern Region Office
4800 Enterprise Way
Modesto, CA 95356
(209) 557-6440

☐ Central Region Office
1990 E. Gettysburg Ave.
Fresno, CA 93726
(559) 230-5950

☒ Southern Region Office
34946 Flyover Court
Bakersfield, CA 93308
(661) 392-5540

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, a petition fee will be assessed at the conclusion of the variance at \$2.75 per pound based on the excess emissions emitted over the duration of the variance period. Additionally, a \$3.75 per pound mitigation fee will be assessed if excess emission are greater than 2000 pounds.

A. NAME OF FACILITY: Aera Energy LLC
FACILITY LOCATION: 59231 Main Camp Rd
CITY: McKittrick STATE: CA ZIP CODE: 93251
TELEPHONE: 661-665-5000 FAX: _____
NAME OF PERSON FILLING OUT PETITION: Brent Winn
TELEPHONE: 661-747-8963 **E-MAIL** Brent.winn@crc.com
NAME OF PERSON AUTHORIZED TO RECEIVE NOTICES: Sam Parks
MAILING ADDRESS: P. O. Box 11164
CITY: Bakersfield STATE: CA ZIP CODE: 93389-1164
TELEPHONE: 661-201-5987 (Cell) **E-MAIL:** Sam.Parks@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
Omar Hyatt	Exec Vice Pres, Operations	See mailing address 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 below for the region they will be participating:

☒ Bakersfield

☐ Fresno

☐ Modesto

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

Crude oil and gas production.

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.

Aera Energy LLC ("Aera") has light and heavy crude oil production operations within the Belridge Oil Field. Water and gases are produced with the crude oil. The light oil gases are separated and collected by the gas gathering system. The collected gases are compressed and piped to the Section 32 SulfurOx Plant for processing. After sulfur and liquids are removed, the treated gas from the plant is sent to the field where its primary use is to fuel steam generators. This produced gas is mixed with purchased pipeline quality "Mojave" gas to improve the combustion quality of the gas.

Gas from heavy oil wells is collected via casing vapor recovery (CVR) piping and is also sent to steam generators for combustion. These gases have a lower BTU content and, in order to sustain combustion, are burned along with the produced/purchased gas mixture.

The 2-3 steam generator setting receives the above-described gas streams (produced/purchased blend and CVR) and is equipped with a sulfur treatment system (2-3 SOx plant) to reduce the sulfur in the CVR gas from the heavy oil wells.

Within the next 2 months, Aera will need to bypass the 2-3 SOx plant to perform cleaning and other necessary maintenance on the plant. Normally, the scrubbed CVR gas contains less than 200 ppm sulfur. While the SOx plant is bypassed, CVR gas containing as much as 1,300 ppm hydrogen sulfide (H₂S) will be burned in the steam generators at this setting.

Aera estimates the work can be accomplished in 24 hours. Aera proposes that this variance allow up to 48 non-consecutive hours of SOx Plant downtime to ensure adequate recovery time in the event that any unexpected complications arise.

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 current version(s).

A list of all current affected operating permits and the corresponding permit conditions for which Aera is requesting variance protection along with explanations is attached.

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).

A list of all District Rule numbers for which Aera is requesting variance protection along with explanations is attached.

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

Prudent operation of the 2-3 sulfur treatment (SOx) plant requires cleaning and maintenance, much of which cannot be performed safely and effectively unless the plant is shut down.

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.

The only viable alternative to bypassing the 2-3 SOx plant that would result in lower emissions would be to shut off the CVR gas from wells upstream of the 2-3 SOx plant. The back-pressure on the wells would affect oil production by about 720 barrels worth approximately \$50,400. Back-pressuring wells has also been known to affect production in the long term, even after well casing vents are re-opened.

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

The SOx plant and associated CVR gas-fired steam generators are currently in compliance.

On or about May 6, 2026, operators observed some valves that couldn't fully isolate and sections of piping (spools) that require a plant shutdown for replacement. For efficiency, other maintenance will also be performed during shutdown.

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

Aera's operations and maintenance personnel have been actively engaged in planning and preparation to minimize the duration of the shutdown and return equipment back to compliance as quickly as possible. As a result of this planning and preparation, Aera is able to request variance coverage for only 48 non-consecutive hours.

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

As noted in Section 6 of this petition, shutting down CVR gas would significantly affect oil production rates in both the short-term and potentially long-term. Even greater impacts would be expected if oil production were to be shut down completely.

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

Pollutant	Pollutant Limit	Actual Emissions	<i>Excess emissions are those that are in excess of the rules or permit conditions or otherwise lawfully allowed</i>	Total Estimated Excess Emissions
VOC				
NO _x				
CO				
SO _x	376	2,649		2,274
PM ₁₀				
PM _{2.5}				

Highest Opacity level anticipated: _____ %

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

Worst case estimates of the emissions for the variance period are attached.

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)

Aera will ensure that the crews are adequately staffed and that all necessary materials are readily available to minimize the amount of sulfur treatment plant downtime.

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

This equipment is located in a remote oil field and is compatible with surrounding land uses. The nearest residence is more than 7 miles distant. Temporary excess SOx emissions will not pose a health risk.

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.

Fuel gas flow rates and actual H2S content will be monitored during the plant shutdown via existing meters and Draeger tubes. This data will be used to estimate excess emissions.

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.

After the work is complete, the sulfur removal plant will be returned to normal operation in compliance with the rules and permit conditions.

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: July 9, 2026 End variance: Sept 7, 2024

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

Aera requests 48 non-consecutive hours of sulfur removal (SOx) plant shutdown.

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.

Cristina LaFore, Kobi Blomberg

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

Date: 6/12/2026

***Signature:**

Signed by:

Jake Cosper

E77B4F5DDDD487...

Title: Process Supervisor

Print Name: Jake Cosper

**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.

Aera Energy

Variance for 2-3 SOx Plant Cleaning and Maintenance Shutdown

Listing of Permits, Conditions, and Applicable Rules

UPDATED 6-10-26

Permit No	Facility Name	Conds	Rules/Section
S-1547-0-5	Facilitywide	10	The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application.
S-1547-0359-34	Bel SOSS CVR system	10	Total mass flowrate of sulfur compounds in gas leaving sulfur removal systems shall not exceed 336.92 lb/day as sulfur.
S-1547-0745-28	Gen2-3A	15	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0746-27	Gen2-3B	16	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0747-26	Gen2-3C	17	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0748-26	Gen2-3D	17	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0749-30	Gen2-3E	15	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0733-25	Gen2-3F	14	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0744-26	Gen2-3G	17	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0760-21	Gen2-3H	11	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0834-25	Gen2-3I	17	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.
S-1547-0835-29	Gen2-3J	17	Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf.

Aera Energy
Excess Emissions Estimate

2-3 Steam Gen Setting - SOx Plant
July 2026 Cleaning & Maint

Permit No	Facility Name	Variance Period Hours	Fuel Volume (mcf)	Fuel Gas HHV (Btu/scf)	Fuel gas Sulfur (ppm)	Waste gas Volume (mcf)	Waste Gas HHV (Btu/scf)	Waste gas Sulfur (ppm)	Weight average Grains (gr/100 scf)	Grains Limit (gr/100 scf)	Excess lb (gr basis)	Theoretical lb SO2/day	lb SO2 /day Limit	lb/MMBTU limit	Excess lb/ MMBtu	Excess lb (BTU basis)	Variance Actual emission (lb)	Variance permit emission limit (lb)	Variance excess emission (lb)			
S-1547-0745	Gen2-3A	24.00	850.70	997.0	11	449.46	334.3	1300	28.22	5	86.3	104.8		N/A	N/A	0.0	104.8	18.6	86.3			
S-1547-0746	Gen2-3B	24.00	722.07	997.0	11	633.65	334.3	1300	37.91	5	127.5	146.9		N/A	N/A	0.0	146.9	19.4	127.5			
S-1547-0747	Gen2-3C	24.00	687.30	997.0	11	592.56	334.3	1300	37.56	5	119.1	137.4		N/A	N/A	0.0	137.4	18.3	119.1			
S-1547-0748	Gen2-3D	24.00	740.43	997.0	11	695.90	334.3	1300	39.28	5	140.7	161.2		N/A	N/A	0.0	161.2	20.5	140.7			
S-1547-0749	Gen2-3E	24.00	696.38	997.0	11	595.28	334.3	1300	37.39	5	119.5	138.0		N/A	N/A	0.0	138.0	18.5	119.5			
S-1547-0733	Gen2-3F	24.00	666.24	997.0	11	699.46	334.3	1300	41.48	5	142.3	161.9		N/A	N/A	0.0	161.9	19.5	142.3			
S-1547-0744	Gen2-3G	24.00	756.10	997.0	11	535.33	334.3	1300	33.70	5	105.9	124.4		N/A	N/A	0.0	124.4	18.4	105.9			
S-1547-0760	Gen2-3H	24.00	785.09	997.0	11	671.80	334.3	1300	37.41	5	134.9	155.7		N/A	N/A	0.0	155.7	20.8	134.9			
S-1547-0834	Gen2-3I	24.00	846.87	997.0	11	334.13	334.3	1300	23.22	5	61.5	78.3		N/A	N/A	0.0	78.3	16.9	61.5			
S-1547-0835	Gen2-3J	24.00	684.52	997.0	11	500.34	334.3	1300	34.32	5	99.3	116.2		N/A	N/A	0.0	116.2	16.9	99.3			
S-1547-359	Bel CVR											1,324.72	336.92									
													(SLC Sulf Limit)									
													Above SLC limit:		987.8							
																	Totals Day 1	1,325	188	1,137		
																	Totals Day 2	1,325	188	1,137		
																	Combined totals	2,649	376	2,274		