

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

FACILITY LOCATION: 59231 Main Camp Rd

CITY: McKittrick STATE: CA ZIP CODE: 93251

TELEPHONE: 661-665-5000 FAX: _____

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 **E-MAIL:** smparks@aeraenergy.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 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 crude oil production operations within the Belridge Oil Field. Water and gases are produced with the light crude oil. The gases are separated and collected by the gas gathering system. Under normal operations, 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.

Aera will need to shut down the Section 32 SulfurOx Plant for annual cleaning/maintenance of the processing equipment. This will include internal vessel cleanings and repairing any leaks that have been delayed until a scheduled shutdown. Gas containing approximately 1400 ppm hydrogen sulfide (H₂S) will be sent to the field, affecting SO_x emissions at steam generators. This residue gas is mixed with pipeline quality gas prior to being burned in generators; the mixture is estimated to have approximately 1300 ppm sulfur upon arrival at the burners.

While planners are confident that the shutdown will last fewer than 120 hours, it is proposed that this variance allow up to 240 hours (10 days) of SulfurOx Plant downtime to ensure adequate recovery time in the event that any unexpected complications arise. Excess emissions are estimated on the basis of the full 240 hours.

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 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)?

The only viable alternative to bypassing the Section 32 SulfurOx Plant that would result in lower emissions would be to completely shut down light oil production in the Belridge field. Less obvious than the direct revenue impact is that this would require numerous personnel-hours in shutting down and re-commissioning oil wells and associated oil handling equipment. In addition, shutting in wells can often reduce their ultimate productive capacity, resulting in resource loss.

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 variance were not granted, Aera would have to shut down over 20,500 barrels per day in light oil production in the Belridge field at a cost of approximately \$47 per barrel (\$963,500 per day). This would result in significant revenue losses to the company and the loss of this production to the oil supply for California refineries and consumers.

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

The steam generators identified in Section 3 above are currently in compliance, but for this required maintenance and cleaning the Section 32 SulfurOx Plant will be shut down. When the Section 32 SulfurOx Plant is bypassed, the SOx emission limits of the steam generators will be exceeded.

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

Aera's operations and maintenance personnel have been meticulously planning to minimize the duration of the shutdown and return equipment back to compliance as quickly as possible.

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

If the variance were not granted, the only viable alternative to bypassing the SulfurOx plant that would result in lower emissions would be to completely shut down light oil production in the Belridge field.

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	7,081	76,901.5		69,820.5
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. Temporary excess SO_x 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 actual 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. Please 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: February 17, 2026 End variance: May 18, 2026

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

Aera requests up to 240 hours of sulfur removal plant shutdown between the dates specified in Item 16. It is expected that the hours will be consecutive, but Aera would like to reserve the option to have them non-consecutive.

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. Please 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: 1/13/2020

*Signature: 

Title: Process Supervisor

Print Name: B.W. Waymire

**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.

SG ID	PTO #	Condition number	Rule/Section	Comments
Facilitywide	S-1547-0000-05	Condition 10.	District Rules 2070, 2080, 2201, 2520, 4201, 4301, 4305, 4306, 4320, 4405, 4406, and 4801.	The Section 32 SulfurOx Plant bypass/shutdown to perform maintenance and repairs will cause the steam generators to exceed the fuel sulfur content limit, SOx lb/MMbtu limit, and/or SOx lb/day limit.
AF 25	S-1547-0001-42	Conds 17 & 18		
AF 26	S-1547-0003-37	Condition 9.		
SD 149	S-1547-0007-38	Conditions 5, 6, and 7		
Gen12-2B	S-1547-0066-29	Conditions 4, 5, and 6.		
Gen12-2F	S-1547-0074-36	Conditions 3, 4, and 5.		
Gen12-2D	S-1547-0086-41	Conditions 2, 3, 4, and 6.		
SD 157	S-1547-0127-31	Conditions 3, 4 and 5		
AF 167	S-1547-0134-25	Conditions 4 and 6		
Gen12-2H	S-1547-0139-23	Conditions 2, 3, and 4.		
AF 126	S-1547-0141-35	Condition 16		
AF 127	S-1547-0142-34	Condition 15		
AF 128	S-1547-0143-35	Condition 16		
AF 129	S-1547-0144-38	Conds 21 & 22		
SD 156	S-1547-0157-31	Conditions 14 and 15		
SD 153	S-1547-0250-34	Conditions 14 and 15		
Gen1-1A	S-1547-0697-36	Conditions 2, 6, and 7.		
AF 27	S-1547-0723-26	Conds 19, 22 & 24		
Gen1-1B	S-1547-0725-26	Conditions 3, 8, and 9.		
Gen2-3F	S-1547-0733-22	Conditions 8 and 14.		
Gen3-2D	S-1547-0735-24	Conditions 6 and 10.		
Gen3-2E	S-1547-0736-23	Conditions 8 and 9.		
Gen3-2G	S-1547-0737-23	Conditions 15 and 17.		
Gen3-2F	S-1547-0738-20	Condition 11.		
Gen3-2H	S-1547-0742-19	Condition 8.		
Gen3-2I	S-1547-0743-23	Conditions 10 and 11.		
Gen2-3G	S-1547-0744-23	Conditions 11 and 12.		
Gen2-3A	S-1547-0745-25	Conditions 9 and 10.		
Gen2-3B	S-1547-0746-24	Conditions 10 and 11.		
Gen2-3C	S-1547-0747-23	Conditions 11 and 12.		
Gen2-3D	S-1547-0748-23	Conditions 11 and 12.		
Gen2-3E	S-1547-0749-27	Conditions 9 and 12.		
Gen2-3H	S-1547-0760-22	Conditions 11 and 12.		
Gen3-2M	S-1547-0761-28	Condition 12.		
Gen11-1G	S-1547-0802-26	Condition 12.		
Gen3-2O	S-1547-0803-22	Condition 10.		
AF 29	S-1547-0807-30	Conds 15, 16 & 17		
Gen1-1D	S-1547-0809-26	Conditions 8 and 9.		
AF 28	S-1547-0833-29	Conds 13 & 14		
Gen2-3I	S-1547-0834-22	Conditions 11 and 12.		
Gen2-3J	S-1547-0835-26	Conditions 11 and 12.		
Gen1-1E	S-1547-0836-23	Condition 11.		
Gen11-1F	S-1547-0837-27	Conditions 11 and 15.		
Gen11-1I	S-1547-1034-25	Conditions 11, 12, and 13.		
Gen11-1J	S-1547-1035-27	Conditions 9, 15, and 16.		

Aera Energy
Excess Emissions Estimates
Variance - Cleaning/Maint for Belridge Sec 32 SOx Plant

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)	Theoretl lb SO ₂ /day	lb SO ₂ /day	SO ₂ Ems Variance Period (lb)	Excess Ems Lb (lb/day basis)	Heat Input (MMBtu/day)	lb SO ₂ / MMBtu	lb/MMBtu limit	Excess lb/MMBtu	Excess lb (Btu basis)	Variance Actual emission (lb)	Variance permit emission limit (lb)	Variance excess emission basis	
S-1547-0001	AF 25	24.00	943.61	1005.8	795.1	0	0	0	49.14		125.0	132.5	7.5	132.5	949	125.0	0.949	0.140	0.055	0.085	80.3	132.5	7.5	125.0 lb/day basis
S-1547-0003	AF 26	24.00	879.31	1005.8	795.1	0	0	0	49.14		123.5	123.5		123.5	884	123.5	0.884	0.140	0.055	0.085	74.8	123.5	48.6	74.8 Btu basis
S-1547-0723	AF 27	24.00	947.24	1005.8	795.1	0	0	0	49.14	1	130.3	133.0	4.3	133.0	953	128.7	0.953	0.140	0.00285	0.137	130.3	133.0	2.7	130.3 grain basis
S-1547-0833	AF 28	24.00	795.96	1005.8	795.1	0	0	0	49.14		111.8	111.8	4.3	111.8	801	107.5	0.801	0.140	0.00285	0.137	109.5	111.8	2.3	109.5 Btu basis
S-1547-0807	AF 29	24.00	799.6	1005.8	795.1	0	0	0	49.14		112.3	112.3	4.3	112.3	804	108.0	0.804	0.140	0.00285	0.137	110.0	112.3	2.3	110.0 Btu basis
S-1547-0141	AF 126	24.00	756.4	1005.8	795.1	0	0	0	49.14		106.2	106.2		106.2	761	58.3	0.761	0.140	0.063	0.077	58.3	106.2	47.9	58.3 Btu basis
S-1547-0142	AF 127	24.00	924.7	1005.8	795.1	0	0	0	49.14		137.9	137.9		137.9	988	137.9	0.988	0.140	0.063	0.077	75.7	137.9	62.3	75.7 Btu basis
S-1547-0143	AF 128	24.00	991.29	1005.8	795.1	0	0	0	49.14		139.2	139.2		139.2	997	139.2	0.997	0.140	0.063	0.077	76.4	139.2	62.8	76.4 Btu basis
S-1547-0144	AF 129	24.00	915.45	1005.8	795.1	0	0	0	49.14		128.5	128.5	94.5	128.5	921	34.0	0.921	0.140	0.063	0.077	70.5	128.5	58.0	70.5 Btu basis
S-1547-0144	AF 129	24.00	915.45	1005.8	795.1	0	0	0	49.14		130.9	130.9	4.3	130.9	938	126.6	0.938	0.140		0.140	130.9	130.9	0.0	130.9 Btu basis
S-1547-0134	AF 167	24.00	932.26	1005.8	795.1	0	0	0	49.14	1	280.7	284.6	82.5	296.9	1,313	214.4	1.258	0.226	0.055	0.171	224.7	296.9	72.0	224.9 grain basis
S-1547-0007	SD 149	24.00	1305.03	1005.8	1288.4	0	0	0	79.63	1.1	280.7	284.6		284.6	1,258	284.6	1.258	0.226	0.003	0.223	280.8	284.6	3.8	280.8 Btu basis
S-1547-0250	SD 153	24.00	1251.02	1005.8	1288.4	0	0	0	79.63	1.1	320.8	325.3		325.3	1,438	325.3	1.438	0.226	0.003	0.223	321.0	325.3	4.3	321.0 Btu basis
S-1547-0157	SD 156	24.00	1429.91	1005.8	1288.4	0	0	0	79.63		275.0	279.3	4.3	279.3	1,235	275.0	1.235	0.226	0.00285	0.223	275.8	279.3	3.5	275.8 Btu basis
S-1547-0127	SD 157	24.00	1227.58	1005.8	1288.4	0	0	0	79.63	0.75	217.0	219.1	4.5	219.1	969	214.6	0.969	0.226	0.003	0.223	216.2	219.1	2.1	217.0 grain basis
S-1547-0697	Gen1-1A	24.00	963.02	1005.8	1288.4	0	0	0	0.00	0.75	0.0	0.0	2.9	0.0	0	0.0	0	0.000	0.002	0.000	0.0	0.0	0.0	0.0
S-1547-0725	Gen1-1B	24.00	908.44	1005.8	1288.4	0	0	0	0.00	0.75	0.0	0.0	2.9	0.0	0	0.0	0	0.000	0.002	0.000	0.0	0.0	0.0	0.0
S-1547-0809	Gen1-1D	24.00	998.44	1005.8	1288.4	0	0	0	79.63		227.2	227.2	3.0	227.2	1,004	224.2	1.004	0.226	0.002	0.224	225.1	227.2	2.0	225.1 Btu basis
S-1547-0836	Gen1-1E	24.00	908.44	1005.8	1288.4	0	0	0	0.00		0.0	0.0		0.0	0	0.0	0	0.000	0.002	0.000	0.0	0.0	0.0	0.0
S-1547-0745	Gen2-3A	24.00	931.76	1005.8	1288.4	517.6	292.6	143.1	54.35	5	204.4	225.1		225.1	1,089	207.5	1.089	0.207	N/A	N/A	0.0	225.1	20.7	204.4 grain basis
S-1547-0746	Gen2-3B	24.00	986.12	1005.8	1288.4	558.2	292.6	143.1	53.22	5	206.2	227.5		227.5	1,107	207.5	1.107	0.206	N/A	N/A	0.0	227.5	21.4	206.2 grain basis
S-1547-0747	Gen2-3C	24.00	823.07	1005.8	1288.4	580.3	292.6	143.1	50.36	5	181.9	201.9		201.9	998	199.2	1.098	0.202	N/A	N/A	0.0	201.9	20.0	181.9 grain basis
S-1547-0748	Gen2-3D	24.00	906.59	1005.8	1288.4	540.6	292.6	143.1	53.19	5	199.2	219.9		219.9	1,070	219.9	1.070	0.206	N/A	N/A	0.0	219.9	20.7	199.2 grain basis
S-1547-0749	Gen2-3E	24.00	825.09	1005.8	1288.4	624.4	292.6	143.1	49.14	5	182.8	203.5		203.5	1,013	199.2	1.013	0.201	N/A	N/A	0.0	203.5	20.7	182.8 grain basis
S-1547-0743	Gen2-3F	24.00	871.27	1005.8	1288.4	647.6	292.6	143.1	49.45	5	192.9	214.6		214.6	1,066	214.6	1.066	0.201	N/A	N/A	0.0	214.6	21.7	192.9 grain basis
S-1547-0744	Gen2-3G	24.00	888.74	1005.8	1288.4	512.0	292.6	143.1	53.75	5	195.1	215.1		215.1	1,044	215.1	1.044	0.206	N/A	N/A	0.0	215.1	20.0	195.1 grain basis
S-1547-0773	Gen2-3H	24.00	931.85	1005.8	1288.4	579.9	292.6	143.1	52.48	5	200.2	226.7		226.7	1,107	226.7	1.107	0.205	N/A	N/A	0.0	226.7	21.6	205.1 grain basis
S-1547-0684	Gen2-3I	24.00	920.49	1005.8	1288.4	362.3	292.6	143.1	59.63	5	184.1	196.5		196.5	1,032	184.1	1.032	0.212	N/A	N/A	0.0	218.6	18.3	200.2 grain basis
S-1547-0835	Gen2-3J	24.00	905.49	1005.8	1288.4	542.5	292.6	143.1	53.11	5	199.0	219.7		219.7	1,069	219.7	1.069	0.206	N/A	N/A	0.0	219.7	20.7	199.0 grain basis
S-1547-0735	Gen3-2D	24.00	1018.12	1005.8	1288.4	0	0	0	79.63	5	217.1	231.6		231.6	1,114	217.1	1.114	0.226	0.00285	0.223	228.7	231.6	2.9	228.7 Btu basis
S-1547-0736	Gen3-2E	24.00	1108.07	1005.8	1288.4	0	0	0	79.63	5	236.3	252.1		252.1	869	252.1	0.869	0.226	0.00285	0.223	248.9	252.1	3.2	248.9 Btu basis
S-1547-0737	Gen3-2F	24.00	863.58	1005.8	1288.4	0	0	0	79.63	5	184.1	196.5		196.5	1,045	184.1	1.045	0.226	0.00285	0.223	233.5	236.5	3.0	233.5 Btu basis
S-1547-0738	Gen3-2G	24.00	1039.42	1005.8	1288.4	0	0	0	0.00	5	221.6	236.5		236.5	1,045	236.5	1.045	0.226	0.00285	0.223	233.5	236.5	3.0	233.5 Btu basis
S-1547-0742	Gen3-2H	24.00	1159.61	1005.8	1288.4	0	0	0	0.00	5	0.0	0.0		0.0	0	0.0	0	0.000			0.0	0.0	0.0	0.0
S-1547-0743	Gen3-2I	24.00	1009.67	1005.8	1288.4	0	0	0	79.63	5	215.3	229.7		229.7	1,016	229.7	1.016	0.226	0.00285	0.223	226.8	229.7	2.9	226.8 Btu basis
S-1547-0761	Gen3-2M	24.00	1017.65	1005.8	1288.4	0	0	0	79.63	5	217.0	231.5		231.5	1,024	231.5	1.024	0.226			231.5	231.5	14.5	217.0 grain basis
S-1547-0803	Gen3-2O	24.00	1055.24	1005.8	1288.4	0	0	0	79.63	5	225.0	240.1		240.1	1,061	240.1	1.061	0.226			240.1	240.1	15.1	225.0 grain basis
S-1547-0837	Gen11-1F	24.00	111.38	1005.8	1288.4	0	0	0	79.63	5	2.4	2.6		2.6	11	2.6	11	0.226	0.002	0.224	2.6	2.6	0.0	2.6 Btu basis
S-1547-0802	Gen11-1G	24.00	1159.61	1005.8	1288.4	0	0	0	79.63		263.8	263.8		263.8	1,166	263.8	1.166	0.226	0.002	0.224	261.5	263.8	2.3	261.5 Btu basis
S-1547-1034	Gen11-1I	24.00	0	1005.8	1288.4	0	0	0	0.00	0.47	0.0	0.0	2.0	0.0	0	0.0	0	0.000	0.0013	0.000	0.0	0.0	0.0	0.0
S-1547-1035	Gen11-1J	24.00	0	1005.8	1288.4	0	0	0	0.00	0.47	0.0	0.0	2.0	0.0	0	0.0	0	0.000	0.0013	0.000	0.0	0.0	0.0	0.0
S-1547-0096	Gen12-2B	24.00	1034.09	1005.8	1288.4	0	0	0	79.63	15.3	178.2	235.3	82.5	235.3	1,040	152.8	1.040	0.226	0.055	0.171	178.1	235.3	57.0	178.2 grain basis
S-1547-0096	Gen12-2B	24.00	50.95	1005.8	1288.4	0	0	0	79.63	1.1	11.4	11.6	4.5	11.6	51	7.1	51	0.226	0.003	0.223	11.4	11.6	0.2	11.4 Btu basis
S-1547-0096	Gen12-2D	24.00	1044.01	1005.8	1288.4	0	0	0	79.63	1.1	234.2	237.5	4.5	237.5	1,050	233.0	1.050	0.226	0.003	0.223	234.4	237.5	3.2	234.4 Btu basis
S-1547-0074	Gen12-2F	24.00	1044.01	1005.8	1288.4	0	0	0	79.63	1.1	234.2	237.5	4.5	237.5	1,050	233.0	1.050	0.226	0.003	0.223	234.4	237.5	3.2	234.4 Btu basis
S-1547-0139	Gen12-2H	24.00	1146.39	1005.8	1288.4	0	0	0	79.63	1.1	257.2	260.8	4.7	260.8	1,153	256.1	1.153	0.226	0.00314	0.223	257.2	260.8	3.6	257.2 grain basis
One-Day Totals															7,690.2				7,690.2	7,690.2	708.1	6,982.0		
Five-Day Totals															38,450.8				38,450.8	38,450.8	3,540.5	34,910.2		
Ten-Day Totals															76,901.5				76,901.5	76,901.5	7,081.0	69,820.5		

Note 1: Cells highlighted in orange only apply when fired safely on natural gas.

Note 2: Cells highlighted in aqua are permitted limited to 19.3 gr/100 scf, but are limited to 5 gr/100 scf per Rule 4320.