

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT ISSUANCE

July 19, 1989

RECEIVED
JUL 28 1989
DER-BAQM

CERTIFIED MAIL #P 675 387 289
RETURN RECEIPT REQUESTED

In the Matter of an Application
for Permit by:

RE: Collier County - AP
Exxon Company
Raccoon Point Oil Field

R. J. Koerner, Production Manager
Exxon Company, USA
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Enclosed is Permit Number A011-160227 to operate the
above-referenced facility, issued pursuant to Section(s) 403.087,
Florida Statutes (F.S.).

A person whose substantial interests are affected by this
permit may petition for an administrative proceeding (hearing) in
accordance with Section 120.57, F.S. The petition must contain
the information set forth below and must be filed (received) in
the Office of General Counsel of the Department at 2600 Blair
Stone Road, Tallahassee, Florida 32399-2400, within 14 days of
receipt of this Permit. Petitioner shall mail a copy of the
petition to the applicant at the address indicated above at the
time of filing. Failure to file a petition within this time
period shall constitute a waiver of any right such person may have
to request an administrative determination (hearing) under Section
120.57, F.S.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each
petitioner, the applicant's name and address, the Department
Permit File Number and the county in which the project is
proposed;

(b) A statement of how and when each petitioner received
notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial
interests are affected by the Department's action or proposed
action;

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP	ACTION NO
	ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial
<i>William Hark</i>	Date
2.	Initial
<i>B. A. Q. M.</i>	Date
3.	Initial
<i>Pallakavve</i>	Date
4.	Initial
	Date

REMARKS:

RECEIVED

JUL 28 1989

DER-BAQM

INFORMATION	
<input type="checkbox"/>	Review & Return
<input type="checkbox"/>	Review & File
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	
DISPOSITION	
<input type="checkbox"/>	Review & Respond
<input type="checkbox"/>	Prepare Response
<input type="checkbox"/>	For My Signature
<input type="checkbox"/>	For Your Signature
<input type="checkbox"/>	Let's Discuss
<input type="checkbox"/>	Set Up Meeting
<input type="checkbox"/>	Investigate & Report
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	Distribute
<input type="checkbox"/>	Concurrence
<input type="checkbox"/>	For Processing
<input type="checkbox"/>	Initial & Return

FROM: *Peter Campbell*
Art Meyers

DATE: *7-26-89*

PHONE: *721-7900*

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code (F.A.C.).

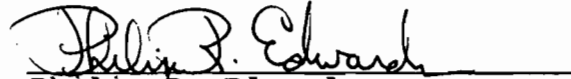
This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S. by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of

Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Ft. Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Philip R. Edwards
Deputy Assistant Secretary
2269 Bay Street
Ft. Myers, FL 33901-2896
(813)332-2667

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on July 26, 1989 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Janice Kasper (Clerk) 7-26-89 (Date)

Copies furnished to:

DER - Tallahassee



Florida Department of Environmental Regulation

South District • 2269 Bay Street • Fort Myers, Florida 33901-2896 • 813-332-2667

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Philip Edwards, Deputy Assistant Secretary

PERMITTEE: Exxon Company - USA
Post Office Box 61707
New Orleans, LA 70161-1707

I.D. Number: 52FTM110031(1) - (9)
Permit/Certification Number: A011-160227
Date of Issue: July 19, 1989
Expiration Date: July 19, 1994
County: Collier
Latitude/Longitude:
25° 58' 45" N
80° 54' 13" W
Section/Township/Range: 35/51S/34E
Project: Raccoon Point Common Tank Battery

This permit is issued under the provisions of Chapter(s) 403.087, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Operation of a 2,750 BOPD maximum capacity oil production facility including a waste gas flare, 12 heater-treaters, 16 pumping units, 2 oil loading pumps, 2 saltwater disposal pumps, 1 circulating pump, 1 oil pipeline pump, 2 generators, and 6 1,000 BBL storage tanks with emissions controlled by a vapor recovery unit.

Facility located off U.S. 41 approximately 60 miles east southeast of Naples, Collier County, Florida.

PERMITTEE: Exxon Company - USA

I.D. Number: 52FTM110031(1) - (9)
Permit/Certification Number: A011-160227
Date of Issue: July 19, 1989
Expiration Date: July 19, 1994

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S. the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE: Exxon Company - USA

I.D. Number: 52FTM110031(1) - (9)
Permit/Certification Number: AO11-160227
Date of Issue: July 19, 1989
Expiration Date: July 19, 1994

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, and at reasonable times, access to the premises where the permitted activity is located or conducted to:

a. Have access to and copy any records that must be kept under conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of non-compliance; and

b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

PERMITTEE: Exxon Company - USA

I.D. Number: 52FIM110031(1) - (9)
Permit/Certification Number: A011-160227
Date of Issue: July 19, 1989
Expiration Date: July 19, 1994

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the date analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used;
6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE: Exxon Company - USA

I.D. Number: 52FTM110031(1) - (9)

Permit/Certification Number: A011-160227

Date of Issue: July 19, 1989

Expiration Date: July 19, 1994

SPECIFIC CONDITIONS:

1. Facility hours of operation are not limited (8,760 hours annually).
2. Annual rate of oil production shall not exceed 1,003,750 BBL and 2,750 BBL average daily oil production rate.
3. Flare gas volume shall not exceed 3.1×10^7 CF annually and 2.58×10^6 CF per month.
4. Visible emissions tests on the waste gas flare and on all combustion equipment are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method Nine as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing before December 31, 1989. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
5. Emissions from the facility shall not exceed the following:*

Emissions (lb/hr/unit)

Unit	No.	VOC	Total TPY	NOx	Total TPY	CO	Total TPY	SO 2	PM	Total TPY
Heater-Treater	12	0.0016	0.0841	0.0297	1.5610	0.0059	0.3101	0	0.0015	0.0788
Pumping Unit	16	0.7420	51.9994	1.8020	126.2842	0.2279	15.9712	0	-	-
Oil Loading Pump	2	0.1559	1.3657	0.3786	3.3165	0.0479	0.4196	0	-	-
Saltwater Disposal Pump	2	0.1559	1.3657	0.3786	3.3165	0.0479	0.4196	0	-	-
Circulating Pump	1	0.0312	0.1367	0.0757	0.3316	0.0096	0.0420	0	-	-
Oil Pipeline Pump	1	0.7420	3.2500	1.8020	7.8928	0.2279	0.9982	0	-	-
Generator	2	1.4653	6.4180	3.5585	15.5862	0.4500	1.9710	0	-	-
Storage Tanks (6)	1	3.505	15.3525	-	-	-	-	-	-	-

* Totals based on 8760 hours/year operation. If active hours of operation are less, the allowable emissions are reduced proportionately.

PERMITTEE: Exxon Company - USA

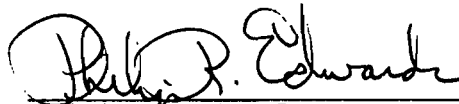
I.D. Number: 52FIM110031(1) - (9)
Permit/Certification Number: A011-160227
Date of Issue: July 19, 1989
Expiration Date: July 19, 1994

SPECIFIC CONDITIONS:

6. Compliance with emission limits specified in Specific Condition No. 5 above is assumed provided that visible emissions from any source do not exceed 10% opacity, and that best operational practices for minimizing air pollution are followed. If visible emissions exceed 10% opacity, EPA test methods or other methods acceptable to the Department must be used to determine the compliance of the affected source.
7. Vapor recovery unit must be monitored by running time meter or operations recording. Duty factor of unit shall be maintained at or above 0.95.
8. All fugitive dust generated at this site shall be adequately controlled.
9. This facility shall be operated in such a fashion so as to preclude objectionable odors.
10. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

Issued this 19th day of July, 1989

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Philip R. Edwards
Deputy Assistant Secretary

PRE/PRC/jsw

9 Pages Attached

→ P 4/20

Check Sheet

Company Name: Exxon Company Raccoon Pt. Field
Permit Number: AC 11-112869
PSD Number:
County: AO 11-160227
Permit Engineer:
Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. Those documents can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Exxon-Raccoon Point Field
AC 11-112869

Period During Which
DOCUMENT WAS
SUBMITTED
(APPLICATION, PD & TE,
FINAL DETERMINATION,
POST PERMIT)

APP

Detailed Description

1. 24" x 36" BLUEPRINT
RACCON POINT TANK
BATTERY ILLUSTRATION IV
2. SAME AS ABOVE, WITH ENGINEER
NOTE "DRWG DOES NOT AGREE
WITH REVISED PERMIT
(4/22/84)"
3. SAME AS #1 REVISED

P 274 007 532

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Mr. R. J. Koerner, Exxon Co.	
Street and No. P.O. Box 61707	
P.O., State and ZIP Code New Orleans, LA 70161-1707	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 12-14-88 Permit: AC 11-112869	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. R. J. Koerner Production Manager Exxon Company Post Office Box 61707	4. Article Number P 274 007 532 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature — Address X	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature — Agent X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery DEC 19 1988	NEW ORLEANS DEC 19 1988 PM

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete Items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

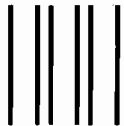
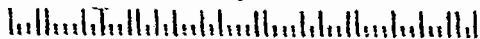
RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attn: Patty Adams



RECEIVED

DEC 27 1988

DER-BAQM



PENALTY FOR PRIVATE
USE, \$300



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 1, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. J. Koerner
Production Manager
Exxon Company
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Koerner:

Re: Amendment of Construction Permit No. AC 11-112869

The Department is in receipt of Mr. Charles A. Martin's letter requesting the permit to construct the Raccoon Point Field be extended because of drilling delays caused by mechanical difficulties and the economic condition in the oil industry. This request is acceptable, with conditions, and the expiration date of construction permit No. AC 11-112869 is extended from December 31, 1988, to December 31, 1990.

Specific Condition No. 10 is revised as follows:

10. The permittee shall submit a complete application for an operation permit, including application fee, test results, and Certificate of Completion, for any equipment approved by permit No. AC 11-112869 that has been placed in operation prior to November 1, 1988. The applications are to be sent to the Department's South Florida District office within 45 days of receipt of this letter.

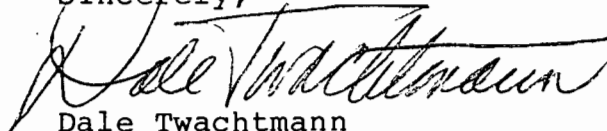
Within 180 days of placing any new production equipment authorized by permit No. AC 11-112869 in commercial operation, a complete application for an operation permit shall be submitted to the South Florida District office.

The Department will not extend this permit beyond December 31, 1990, without re-evaluating and, if authorized under the regulations in existence at that time, requiring new air pollution control systems and emission limits prior to installing the remainder of the permitted equipment.

Mr. R. J. Koerner
Page Two
December 1, 1988

A copy of this letter must be attached to the referenced construction permit and shall become a part of that permit.

Sincerely,



Dale Twachtmann
Secretary

DT/plm

Attachment: Exxon September 23, 1988 letter

cc: David Knowles, South Florida District
Charles Martin, Exxon

*Called Dave Knowles
11-29-88. Told him
we had received
Exxon request on 9-30
& had drafted letter
to OK extension. Still
sent Dave a copy when
signed.*

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

PRODUCTION DEPARTMENT
EASTERN DIVISION

September 23, 1988

Raccoon Point Field
Common Tank Battery
Collier County, Florida
Permit No. AC-11-112869 Extension

RECEIVED

SEP 26 1988

DER-BAQM

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

A two year extension beyond the December 31, 1988, expiration date of the referenced permit to construct is requested. The extension is necessary to accommodate drilling delays resulting from mechanical difficulties experienced with the CL&CC 22-3 well and economic conditions in the oil industry.

The CL&CC 22-3 well was drilled in 1987 to define the north section of the Raccoon Point field, however due to water channeling, we have to date been unable to adequately test the formation thus delaying offset wells. Efforts to resolve problems with the CL&CC 22-3 well continue with expectations that an accurate formation test will justify one and possibly three additional wells in the next two years.

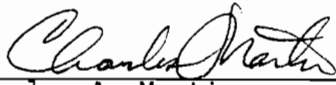
With these additional wells Exxon will remain within the allowable emission rates. As of August 1988, Exxon has only installed 12 of the 26 proposed heater treaters, 15 of the proposed 25 pumping units and oil production remains below the allowable of 7500 BOPD at 3000 BOPD.

Should you need additional information to process this extension request, please contact Mr. Gary Kittle at 504-561-4601.

Sincerely yours,

EXXON COMPANY, U.S.A.

By:


Charles A. Martin
Permitting Coordinator
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

GWK:dpp (5D)

copied: *William Hanks*
David K. ... SF District
CHF/BT



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

DEC 2 1988
Office of the Secretary

TO: Dale Twachtmann

FROM: Steve Smallwood *[Signature]*

DATE: November 30, 1988

SUBJ: Amendment of a Permit to Construct

Attached for your approval and signature is a letter that will extend the expiration date of the construction permit issued for Exxon's Raccoon Point Oil Field. The extension will allow the company additional time to correct mechanical difficulties and install the remainder of the equipment that was authorized by the construction permit.

This request is not controversial. The Bureau recommends that this extension be approved.

SS/WH/plm

Attachment

RECEIVED

DEC 5 1988

DER-BAQM

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161 1707

RECEIVED

NOV 28 1988

PRODUCTION DEPARTMENT
EASTERN DIVISION

November 23, 1988

DER-BAQM

Raccoon Point Field
Common Tank Battery
Permit #AC-1-112869 Extension

Mr. Sherrill Culliver
Environmental Specialist
Florida Department of Environmental Regulation
South District
2269 Bay Street
Fort Meyers, Florida 33901-2896

Dear Mr. Culliver:

Thank you for your letter of November 9, 1988. Please find attached our letter dated September 23, 1988 requesting a time extension. It is possible that Mr. Fancy did not receive our letter. Therefore, we are sending him a copy. If any further information is required please let me know.

Very truly yours,

Exxon Corporation

By 

Charles Martin,
Permits Coordinator
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

CAM:rrv
Enclosure

xc: Mr. Clair H. Fancy
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

September 23, 1988

PRODUCTION DEPARTMENT
EASTERN DIVISION

Raccoon Point Field
Common Tank Battery
Collier County, Florida
Permit No. AC-11-112869 Extension

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

A two year extension beyond the December 31, 1988, expiration date of the referenced permit to construct is requested. The extension is necessary to accommodate drilling delays resulting from mechanical difficulties experienced with the CL&CC 22-3 well and economic conditions in the oil industry.

The CL&CC 22-3 well was drilled in 1987 to define the north section of the Raccoon Point field, however due to water channeling, we have to date been unable to adequately test the formation thus delaying offset wells. Efforts to resolve problems with the CL&CC 22-3 well continue with expectations that an accurate formation test will justify one and possibly three additional wells in the next two years.

With these additional wells Exxon will remain within the allowable emission rates. As of August 1988, Exxon has only installed 12 of the 26 proposed heater treaters, 15 of the proposed 25 pumping units and oil production remains below the allowable of 7500 BOPD at 3000 BOPD.

Should you need additional information to process this extension request, please contact Mr. Gary Kittle at 504-561-4601.

Sincerely yours,

EXXON COMPANY, U.S.A.

By:



Charles A. Martin
Permitting Coordinator
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

GWK:dpp (5D)

bxc: W. R. Byrd
R. T. Dismuke
R. J. Hawthorne
W. N. Strawbridge
S. D. Tarrant



Florida Department of Environmental Regulation

South District • 2269 Bay Street • Fort Myers, Florida 33901-2896 • 813-332-2667
Bob Martinez, Governor Dale Twachmann, Secretary John Shearer, Assistant Secretary
BIM Edwards, Deputy Assistant Secretary

SAB	PERMITS SURVEILLANCE
Street	
SIH	
Date	NOV 14 1988
Twachmann	
November 9, 1988	
JES	
JTP	
JSP	
JCS	

Mr. Charles A. Martin
Permit Surveillance Supervisor
Eastern Division
Exxon Company, U.S.A.
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Jay Little

Re: Collier County - AP
Exxon Company, Racoon Point
Permit AC11-112869 Renewal
Electric Generator/Dsposal
Pump, etc.

Dear Mr. Martin:

In accordance with our files your construction permit will expire on December 31, 1988. Enclosed is a certificate of completion of construction. If construction is complete, please submit this certificate plus a fee of \$750.00. If construction is not complete, please send a letter requesting a change in expiration date of your permit to Clair H. Fancy, Department of Environmental Regulation, B.A.Q.M., 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 with a copy to this office.

Should you have any questions please call me at (813)322-2667. Your cooperation will be appreciated.

Sincerely,

Sherrill Culliver
Sherrill Culliver
Environmental Specialist

SC/jsw

Enclosure



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. _____ DATE: _____

Company Name: _____ County: _____

Source Identification(s): _____

Actual costs of serving pollution control purpose: \$ _____

Operating Rates: _____ Design Capacity: _____

Expected Normal _____ During Compliance Test _____

Date of Compliance Test: _____ (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Date plant placed in operation: _____

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. _____ dated _____.

A. Applicant:

Name of Person Signing (Type) Signature of Owner or Authorized Representative and Title

Date: _____ Telephone: _____

B. Professional Engineer:

Name of Person Signing (Type) Signature of Professional Engineer

Company Name Florida Registration No. _____

Date: _____

(Seal)

Mailing Address

Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

PM
9-23-88
New Orleans, LA

file copy

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

RECEIVED

SEP 26 1988

September 23, 1988

DER-BAQM

PRODUCTION DEPARTMENT
EASTERN DIVISION

Raccoon Point Field
Common Tank Battery
Collier County, Florida
Permit No. AC-11-112869 Extension

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

A two year extension beyond the December 31, 1988, expiration date of the referenced permit to construct is requested. The extension is necessary to accommodate drilling delays resulting from mechanical difficulties experienced with the CL&CC 22-3 well and economic conditions in the oil industry.

The CL&CC 22-3 well was drilled in 1987 to define the north section of the Raccoon Point field, however due to water channeling, we have to date been unable to adequately test the formation thus delaying offset wells. Efforts to resolve problems with the CL&CC 22-3 well continue with expectations that an accurate formation test will justify one and possibly three additional wells in the next two years.

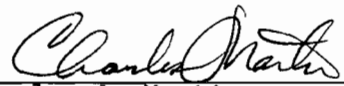
With these additional wells Exxon will remain within the allowable emission rates. As of August 1988, Exxon has only installed 12 of the 26 proposed heater treaters, 15 of the proposed 25 pumping units and oil production remains below the allowable of 7500 BOPD at 3000 BOPD.

Should you need additional information to process this extension request, please contact Mr. Gary Kittle at 504-561-4601.

Sincerely yours,

EXXON COMPANY, U.S.A.

By:


Charles A. Martin
Permitting Coordinator
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

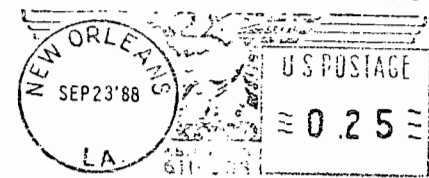
GWK:dpp (5D)

*copied: Willard Hanks
David Knowles, SF District
C/HF/BT*

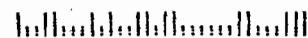
EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

110-0216



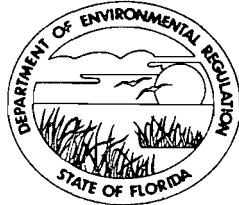
Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32301



SEP 23 1988
NEW ORLEANS, LA
61707

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 31, 1986

Mr. Charles A. Martin
Permit Surveillance Supervisor
Eastern Division
Exxon Company, U.S.A.
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Martin:

Re: Raccoon Point Tank Battery
Permit No. AC 11-112869

The following comments should clarify the issues raised in your October 16, 1986, letter concerning the department's intent in referenced permit to construct.

The Raccoon Point Tank Battery may operate under the provisions of its existing permit to operate (AO 11-95408) until this permit is revoked, expires, or any new process equipment authorized by construction permit No. AC 11-112869 is placed in service. When any of the new process equipment is placed in service, the operation of the existing and new equipment will be under the authority of the construction permit. Prior to the expiration of construction permit, your company must apply for a new permit to operate the complete facility (Specific Condition No. 10).

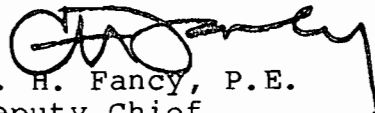
Periodic tests are required to confirm compliance with the regulations and permit restrictions. The company must conduct visible emission tests on all combustion equipment annually. If the visible emissions exceeds 10 percent opacity, other tests may be required (Specific Condition No. 6). The company will also be required to confirm it is operating within the restriction on production (Specific Condition No. 3). Annual operation reports, which include the latest visible emissions tests reports and best engineering estimate of the actual production and gas destruction (flared), must be submitted to the department's South Florida District office. The department may require additional tests anytime we have good reasons to suspect the regulations or permit restrictions are being violated (Rule 17-2.700(2)(b), FAC).

Mr. Charles A. Martin
Page Two
October 31, 1986

Specific Condition No. 1 authorized (but does not require) this facility to operate continuously if it is in compliance with all regulations and permit restrictions.

If you have additional questions on this matter, please call Willard Hanks at (904)488-1344 or write to me at the letterhead address.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s

cc: D. Knowles

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

PRODUCTION DEPARTMENT
EASTERN DIVISION

October 16, 1986

Raccoon Point Tank Battery
Permit Number AC 11-112869

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

In confirmation of our discussions of August 20, 1986 with Mr. Willard Hanks of your office, concerning Permit Number AC 11-112869, we make the following observations:

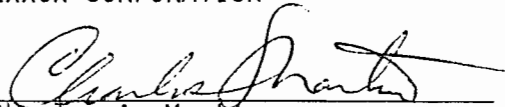
1. The Raccoon Point Tank Battery will operate under the provisions of existing Operating Permit Number A0-11-95408 until such time as the equipment specified in the new construction permit is put into service. At that time the specific conditions of the construction permit will become effective.
2. Periodic tests to confirm compliance with Specific Condition Number 3 will be required.
- ✓3. It is the intent of the construction permit to allow, but not require, continuous operations.

We will continue to operate under our current Operating Permit unless notified differently.

Sincerely yours,

EXXON CORPORATION

By


Charles A. Martin
Permits Surveillance Supervisor
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

CAM/scw

xc: F. C. McCarty
C. W. Clark
David Knowles 10/21/86

DER

OCT 20 1986

BAQM

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

PRODUCTION DEPARTMENT
EASTERN DIVISION

October 16, 1986

Raccoon Point Tank Battery
Permit Number AC 11-112869

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

In confirmation of our discussions of August 20, 1986 with Mr. Willard Hanks of your office, concerning Permit Number AC 11-112869, we make the following observations:

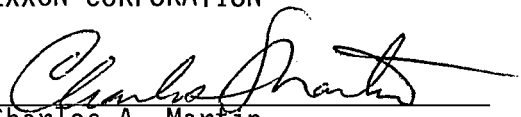
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2. Periodic tests to confirm compliance with Specific Condition Number 3 will be required.
- ✓3. It is the intent of the construction permit to allow, but not require, continuous operations.

We will continue to operate under our current Operating Permit unless notified differently.

Sincerely yours,

EXXON CORPORATION

By


Charles A. Martin
Permits Surveillance Supervisor
Eastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

CAM/scw

xc: F. C. McCarty
C. W. Clark
David Knowles 10/21/86

DER

OCT 20 1986

BAQM

P 408 532 112

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

Sent to Mr. R. J. Koerner	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 7/23/86	

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

● **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. R. J. Koerner
Exxon Company, U.S.A.
P. O. Box 61707
New Orleans, LA 70161-1707

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 532 112

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X *[Signature]*

7. Date of Delivery
7/23/86

8. Addressee's Address (ONLY if requested and fee paid)

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS



SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE USE, \$300

RETURN TO

Dept. of Environmental Regulation

(Name of Sender)

BAQM
DER
2600 Blair Stone Road
(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

Tallahassee, FL 32301

(City, State, and ZIP Code)

AUG 4 1986

Attn: Patty Adams

BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. R. J. Koerner
Production Manager
Exxon Company, U.S.A., Eastern Division
Post Office Box 61707
New Orleans, Louisiana 70161-1707

July 22, 1986

Enclosed is Permit Number AC 11-112869 to Exxon Company, U.S.A. to modify the existing Raccoon Point oil production facility in Collier County to allow extraction, separation, and storage of a maximum of 7,500 BOPD and construction of associated equipment. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for William M. Hanks
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

John P. Higgins, P.E.
W. L. Palmer
David Knowles

Final Determination

Exxon's application for permit to modify the existing Raccoon Point Field Production Facilities in Collier County has been reviewed by the Bureau of Air Quality Management. Public Notice of the department's intent to issue the permit was published in the Naples Daily News on June 18, 1986. Exxon submitted comments on the draft permit to the bureau on July 14, 1986. Exxon's comments and the bureau's responses follow.

Expiration Date Extension Request:

The initial application listed completion of construction as the first quarter of 1986 or as the wells are drilled. Exxon's plans now are to commence construction of a two year drilling program during the fourth quarter of 1986. The department will extend the expiration date of this construction permit until December 31, 1988, or 120 days after the thirteenth well is drilled, whichever date occurs first. Specific Condition No. 10 is modified to incorporate this condition.

General Condition No. 8

Exxon does not want to report noncompliance situations until they detect them. The department believes the company has the responsibility to comply with the regulations and permit conditions at all times. Extended, unmanned, unmonitored oil field operations is not good operational practice. It is in the company's interest to routinely monitor these operations. Environmental matters must be given the same attention and priority as production and safety of the operation. Frequent noncompliance situations could result in enforcement action that may require the facility to be manned or equipped with sensors. The department does not propose any changes to this general condition.

Specific Condition No. 2

The company requested the daily production be noted as a maximum yearly average of 7500 BOPD. It is noted that the maximum field production is forecasted to be 5,000 BOPD. The intent of the department is to allow the permitted 25 wells and associated equipment described in the application and other documents to produce at their maximum capacity or 2,737,500 BBL/yr (avg. 7500 BOPD), whichever is lowest. Exxon is not authorized to install additional equipment, other than that authorized by this and previous construction permits, to obtain 7,500 BOPD or a higher production capacity from the field or upgrade existing equipment for higher production capacity. Such changes will require a new permit. Specific Condition No. 2 is modified to show the daily

production is an annual average and the department's intent in this matter.

Specific Condition No. 4

Several of the emissions listed in Table 2 were based on 5,000 BOPD. Exxon requested that all allowable emissions be based on 7,500 BOPD. The department's intent is for the allowable emissions to be a function of the actual production. Table 2 is revised to reflect the emissions at 7,500 BOPD and a statement added that the allowable emissions are a function of the production.

Specific Condition No. 6

Exxon requested a higher allowable visible emission limit for the flare. The original construction permit for this facility, which included the flare, required all sources with visible emissions above 10 percent opacity to be tested for particulate matter. Exxon has reported visible emissions of 0 percent opacity for this flare. Visible emissions above 10 percent would imply the flare is not operating properly. Specific Condition No. 6 will remain as proposed.

The final action of the department will be to issue the construction permit with the changes discussed above.

Attachment: Exxon's July 8, 1986 letter

Final Determination

Exxon Company, U.S.A.
Raccoon Point Field
Collier County, Florida

New Construction and Modification to
Raccoon Point Field Production Facilities
Permit No. AC 11-112869

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

July 18, 1986

✓

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: Exxon Company, U.S.A.
P. O. Box 61707
New Orleans, LA 70161-1707

Permit Number: AC 11-112869
Expiration Date: December 31, 1988
County: Collier
Latitude/Longitude: 25° 58' 45"N
80° 54' 13"W
Project: Upscale Raccoon Point Facility
to 7,500 BOPD; & construction
of associated equipment

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. UTM coordinates of the site are Zone 17, 509.6 km East and 2873.2 km North.

Construction shall be in accordance with the attached permit application and additional materials except as otherwise noted on pages 5-7, Specific Conditions.

Attachments:

1. FDER construction permit AC 11-62020 issued April 17, 1983; revised August 13, 1984.
2. "Application to Construct Air Pollution Sources," FDER Form 17-1.122(16); received December 6, 1985.
3. C. H. Fancy's letter of January 3, 1986.
4. C. A. Martin's letter of February 4, 1986.
5. C. H. Fancy's letter of February 21, 1986.
6. C. A. Martin's letter of March 24, 1986.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Operation is continuous (8,760 hours annually).
2. Annual rate of oil production shall not exceed 2,737,500 BBL and 7,500 BBL average daily oil production rate. Actual production will be established from operation data on the 25 wells and listed as a limit not to be exceeded in any permit to operate issued for this facility.
3. Annual gas throughput to flare shall not exceed 1.74348×10^8 SCF and 1.453×10^7 SCF per month.

Emissions from the flare shall not exceed 10% opacity (DER Method 9, Rule 17-2.700(6)(a)9, FAC).

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

SPECIFIC CONDITIONS:

4. Emissions from the modified facility shall not exceed the following:

Table 2
Allowable Emissions for Facility after Proposed Modifications*

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	26	0.001	0.09	0.04	4.56	0.01	1.14	0	0	0.002	0.26
Pumping Unit	25	0.588	64.50	2.40	262.47	0.31	34.00	0	0	--	--
Oil Loading Pump	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (Exist)	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (New)	1	0.48	2.12	2.40	10.5	0.3	1.36	0	0	--	--
Circulating Pump	2	0.035	0.30	0.14	1.26	0.02	0.16	0	0	--	--
Electric Gen. (Exist)	1	0.21	0.92	0.86	3.76	0.11	0.48	0	0	--	--
Electric Gen. (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Oil Pipeline Pump	2	0.588	5.15	2.40	21.00	0.31	2.72	0	0	--	--
Storage Tanks (1000 Bbl)	6	--	94.86	--	--	--	--	0	0	--	--
Flare	1	--	1.1	--	25.88	--	5.88	0	0	--	--
Truck Oil Loading	0	--	--	--	--	--	--	0	0	--	--
Total			176.07		349.58		48.34		0		0.26
Previous emissions (AC 11-62020)			216.08		154.70		19.99		0.03		0.03
Change after Modification			(40.01)		194.88		28.35		(0.03)		0.23

*Table is based on an average daily production of 7500 BOPD.
If actual production is less than 7,500 BOPD, the allowable emissions are reduced proportionally.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

SPECIFIC CONDITIONS:

5. Vapor recovery unit must be monitored by running time meter or operations recording such that duty factor of unit is maintained at ≥ 0.8 .
6. Compliance with emissions set forth in (4) above shall be based on $\leq 10\%$ opacity as determined by DER Method 9, and a manner consistent with good air pollution practice for minimizing emissions. If visible emissions exceed 10% opacity, EPA test methods or other methods acceptable to this department must be used to determine the compliance of the affected source.
7. Proper maintenance of all equipment subject to this permit is required.
8. Reasonable precautions to prevent fugitive particulate emissions during construction, such as coating or spraying roads and construction sites used by work parties, will be taken by the permittee.
9. The construction shall reasonably conform to the specifications and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the department in writing 60 days prior to the expiration of this construction permit and submit a new schedule and request for an extension of the construction permit (Rule 17-4.09, FAC).
10. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's South Florida District office 90 days prior to the expiration date of the construction permit or 120 days after the thirteenth well is drilled, whichever date occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rule 17-4.22 and 17-4.23)
11. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a after receipt of a complete application. (FAC Rule 17-4.10)

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: December 31, 1988

SPECIFIC CONDITIONS:

Issued this 21st day of July, 1986

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on July 23, 1986 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia B. Adams 7/23/86
Clerk Date

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
From: _____ DATE: _____

TO: Victoria J. Tschinkel
FROM: *for* Clair Fancy *[Signature]*
DATE: July 18, 1986
SUBJ: Approval of Air Construction Permit

RECEIVED
JUL 18 1986

Office of the Secretary

Attached for your approval and signature is one air construction permit to Exxon Company, U.S.A. to allow extraction, separation, and storage of a maximum of 7,500 BOPD and construction of associated equipment.

Day 90, after which the permit would be issued by default, is July 25, 1986.

The Bureau recommends your approval and signature.

CF/pa

Attachment

DER
JUL 21 1986
BAQM

EXXON COMPANY, U.S.A.
POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

July 8, 1986

Raccoon Point Tank Battery
Permit No. AC-11-112869

PRODUCTION DEPARTMENT
EASTERN DIVISION

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
JUL 14 1986
BAQM

Dear Mr. Thomas:

The following are comments regarding the Intent to Issue Permit No. AC-11-112869 for the expansion of the Raccoon Point Tank Battery, Collier County, Florida:


- o Expiration date: The thirteen proposed wells are scheduled for a two-year drilling program commencing in the 4th quarter 1986. Facilities for these wells will only be built as the wells are completed and tested productive. We request an expiration date of 12/31/88 with the option of permit renewal.
- o General Condition 8: Since this facility is not continuously manned, there is the potential for a noncompliance to go undetected for some period of time. We request the language be changed to read: "... immediately upon detection notify..."
- o Specific Condition No. 2: The specified 2.7375 MBO yearly production limit should correspond to a 7500 bbl average daily oil production rate.
- o Specific Condition No. 4: It appears the VOC emissions calculated for the storage tanks were based on an inlet rate of 5000 BOPD rather than the requested 7500 BOPD. The total tank VOC emission rate should be 94.86 TPY with a corresponding facility rate of 175.70 TPY. Flare emission calculations should also be based on a 7500 BOPD rate.
- o Specific Condition No. 6: Existing permit No. AO-11-95408 specifies a 20% opacity limit on flare operations for which the flare was designed. As the flare will not be modified as a result of the proposed facility expansion, we request the opacity limit be maintained at 20% consistent with FAC Rule 17-2.600(10). We also request an excursion to the 20% limit be allowed for a two-minute period in any one hour.

If additional information is required, please address any future correspondence to my attention at the letterhead address.

Very truly yours,

EXXON COMPANY, U.S.A.

By:


C. A. Martin
Permits/Surveillance Supervisor
Operations Accounting
Exxon Company, U.S.A.
(a division of Exxon Corporation)

WLP:dpp
A DIVISION OF EXXON CORPORATION
xc: Mr. David Knowles, DER

EXXON COMPANY, U.S.A.
POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

DER
JUN 16 1986
BAQM

PRODUCTION DEPARTMENT
EASTERN DIVISION

June 10, 1986

Permit
No. AC 11-112869
Raccoon Point Field
Collier County, Florida

Naples Daily News
1075 Central Ave.
Naples, Florida 33940

Attention Mrs. B. Little

Gentlemen:

Attached is a copy of a legal notice we request be published upon receipt for one time only in the Naples Daily News.

Please furnish a copy of proof of publication within seven days of publication of notice to:

State of Florida
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Attention: C.H. Fancy, P.E.

The affidavit and bill should be sent to:

Mr. Charles Martin
Operations Accounting Permits/Surveillance Supervisor
Exxon Company, U.S.A.
P.O. Box 61707
New Orleans, Louisiana 70161-1707

Your immediate attention to this request would be appreciated. Thank you.

Exxon Company, U.S.A.

c- C.H. Fancy, P.E.
Philip R. Edwards

Sophie Kleinschmidt
for Charles Martin, Permits/Surveillance Supv.

SK/ks
Attachments

Certified Mail No. P 130 163 822
A DIVISION OF EXXON CORPORATION

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Exxon Company, U.S.A. for the modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon Company's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
South Florida District
2269 Bay Street
Ft. Myers, Florida 33901

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

NAPLES DAILY NEWS
Published Daily Except Saturday
Naples, Florida 33940

Affidavit of Publication

State of Florida
County of Collier

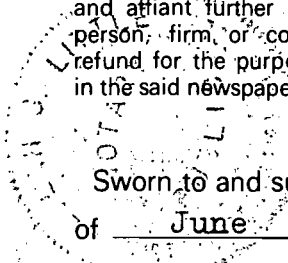
Before the undersigned authority, personally appeared
Corbin Wyant, who on oath says that

he is the Publisher of the Naples Daily News,
a daily newspaper published by Collier County Publishing
Co., Inc., at Naples, Collier County, Florida, that the
attached copy of advertisement, being a
Notice of Intent

in the matter of Permit #ACV112869 Raccoon
Point Field

in the _____ Court, was published in
said newspaper in the issues of
June 18, 1986

Affiant further says that the said Naples Daily News is a newspaper
published by Collier County Publishing Co., Inc., at Naples, in said
Collier County, Florida and that the said newspaper has heretofore
been continuously published in said Collier County, Florida, each day,
and has been entered as second class mail matter at the post office in
Naples, in said Collier County, Florida, for a period of one year next
preceding the first publication of the attached copy of advertisement;
and affiant further says that he has neither paid nor promised any
person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication
in the said newspaper.



[Signature]

Sworn to and subscribed before me this 18th day
of June, A.D. 19 86

[Signature]

Notary Public of Florida

My Commission Expires

Sept. 29, 1989
Bounded thru Troy Fair - Insurance Inc.

DER
JUN 28 1986
BAQM

State of Florida
Department of
Environmental Regulation
Notice of Intent
The Department gives notice
of its intent to issue a permit to
Exxon Company, U.S.A. for the
modification of the existing
Raccoon Point oil production
facility to allow extraction,
separation, and storage of a
maximum of 7,500 BOPD of
product. This will be accom-
plished by adding heater-treat-
ers, attendant equipment, and
13 additional wells. This facility
is located at Exxon Company's
Raccoon Point oil field which is
approximately 60 miles ESE of
Naples, Florida off of US 41, in
Collier County. A determination
of best available control tech-
nology (BACT) was not re-
quired.
Persons whose substantial in-
terests are affected by the De-
partment's proposed permitting
decision may petition for an ad-
ministrative determination
(hearing) in accordance with
Section 120.57, Florida Statutes.
The petition must conform to
the requirements of Chapters
17-103 and 28-5, Florida Admin-
istrative Code, and must be
filed (received) in the Depart-
ment's Office of General Coun-
sel, 2600 Blair Stone Road, Twin
Towers Office Building, Talla-
hassee, Florida 32301, within
fourteen (14) days of publica-
tion of this notice. Failure to
file a petition within this time
period constitutes a waiver of
any right such person has to re-
quest an administrative deter-
mination (hearing) under Sec-
tion 120.57, Florida Statutes.
If a petition is filed, the ad-
ministrative hearing process is
designed to formulate agency
action. Accordingly, the De-
partment's final action may be
different from the proposed
agency action. Therefore, per-
sons who may not wish to file a
petition may wish to intervene
in the proceeding. A petition for
intervention must be filed pur-
suant to Rule 28-5.207, Florida
Administrative Code, at least
five (5) days before the final
hearing and be filed with the
hearing officer, if one has been
assigned at the Division of Ad-
ministrative Hearings, Depart-
ment of Administration, 2009,
Apalachee Parkway, Tallahas-
see, Florida 32301. If no hearing
officer has been assigned, the
petition is to be filed with the
Department's Office of General
Counsel, 2600 Blair Stone Road,
Tallahassee, Florida 32301.
Failure to petition to intervene
within the allowed time frame

constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Dept. of Environmental
Regulation
South Florida District
2269 Bay Street
Ft. Myers, Florida 33901
Any person may send written
comments on the proposed ac-
tion to Mr. Bill Thomas at the
department's Tallahassee ad-
dress. All comments mailed
within 30 days of the publica-
tion of this notice will be con-
sidered in the department's
final determination.
June 18 No. 2324

P 408 532 123

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

Sent to Mr. R. J. Koerner	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 6/3/86	

PS Form 3811, JULY 1983, 47-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- 1. Show to whom, date and address of delivery.
- 2. Restricted Delivery.

3. Article Addressed to:

Mr. R. J. Koerner
Exxon Company, U.S.A.
P. O. Box 61707
New Orleans, LA 70161-1707

325

4. Type of Service:

- Registered
- Insured
- Certified
- COD
- Express Mail

Article Number

P 408 532 123

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee

X

6. Signature - Agent

X

Ray Murray

7. Date of Delivery

JUN 6 1986

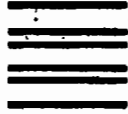
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PER

NOV 9 1986



DAQM

PENALTY FOR PRIVATE USE, \$300

RETURN
TO



Dept. of Environmental Regulation

BAQM (Name of Sender)

2600 Blair Stone Road

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

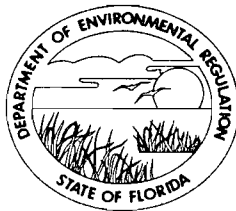
Tallahassee, FL 32301

(City, State, and ZIP Code)

Attn: Patty Adams

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

June 3, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. J. Koerner
Production Manager
Exxon Company, U.S.A., Eastern Division
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Koerner:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to modify your existing Raccoon Point oil production facility in Collier County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachments

cc: John P. Higgins, P.E.
W. L. Palmer
David Knowles

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Exxon Company, U.S.A. for the modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon Company's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
South Florida District
2269 Bay Street
Ft. Myers, Florida 33901

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Exxon Company, U.S.A.
Post Office Box 61707
New Orleans, LA 70161-1707

DER File No. AC 11-112869

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Exxon Company, U.S.A., applied on December 20, 1985, to the Department of Environmental Regulation for a permit to modify the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. The proposed construction will be located at the applicant's existing oil field which is located approximately 60 miles ESE of Naples, Collier County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

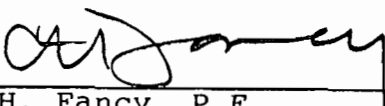
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

R. J. Koerner, Exxon Company
John P. Higgins, P.E., Exxon Company
W. L. Palmer, Exxon Company
David Knowles, DER South Florida District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on June 3, 1986.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams June 3, 1986
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit.
Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S.
History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

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agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

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the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications. To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

Technical Evaluation
and
Preliminary Determination

Exxon Company, USA
Raccoon Point Field
Collier County, Florida

New Construction & Modifications to
Raccoon Point Oil Field Production Facilities
Permit No. AC 11-112869

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

June 3, 1986

I. Application

A. Name and Address of Applicant

Exxon Company, U.S.A.; Eastern Division
Post Office Box 61707
New Orleans, Louisiana 70161-1707

B. Source Location

The projected well will be located at the applicant's existing facility, which is north of U.S. 41 and approximately 60 miles ESE of Naples, in Collier County, Florida. UTM coordinates are Zone 17, 509.6 km East and 2873.2 km North. Facility codes include: Standard Industrial Code (SIC) 1311 (crude oil production and processing); Source Classification Codes 3-10-001-01 (well completion), 3-10-001-03 (oil pumping-rod pump), and 3-10-001-99 (misc. crude oil treatment).

II. Project

A. Project Overview

The applicant proposes to drill an additional 13 oil wells, which will bring the total number of wells comprising this field to 25. Maximum field production, on basis of the data in the application, is forecast at 5000 barrels of oil per day (BOPD). The maximum projected output of this field is 7,500 BOPD.

Installation of the following equipment will be concomitant to drilling: 13 oil well pumps, 13 heater-treaters, 1 test heater-treater, 1 oil pipeline pump, 1 saltwater (SW) discharge pump, and 1 test electric generator. A retro-fitted vapor recovery system for the existing storage tank battery is included in this project.

B. Process Description

At each of the completed wells is an 100 hp Waukesha natural (or fuel) gas fired pumping engine. These engines lift the oil via a rod pump. Leakage traps are maintained at the above ground orifice to prevent escape of VOC's.

This heavy crude flows from the well site via above ground piping to the main tank battery area. In some cases a well's product may be separated into crude, water, and gas by a knock-out vessel. A knock-out vessel relies on gravity separation and has no associated emissions.

The facility at Raccoon Point produces and stores crude oil for sale. The facility consists of oil wells, heater-treaters

(1 per well), a test heater-treater, knock-out vessels, storage tanks, vapor recovery unit, a flare, circulating pumps, electric generators, salt water discharge well pumps, and pumps to transport the product of this field to remote storage.

Heater-treaters heat the crude in order to facilitate separation of oil and water. Each is rated at one-half million Btu per hour. They are fired using the natural gas evolved from the crude.

Storage tanks containing the heavy crude employ a Hy-Bon skid mounted, single-stage, stock tank vapor recovery unit Model HB-50A and John Zinc Smokeless Flare, Model LRGO, to control VOC emissions. VOC in the vapor state evolves from the stored crude. The vapors are vented to a compressor unit which liquifies and returns the VOC to the stored product. This vapor recovery unit is included in the scope of the current modifications, and in conjunction with the flare, provides a very significant decrease in VOC emissions over the previously permitted venting to the atmosphere.

Salt water, which is separated by either knock-out vessels and/or heater-treater units, is stored in a tank before being injected underground.

All pumps, heater-treaters, and electrical generators are natural-gas fired. This is the same gas that was separated from the crude.

C. Process Controls

Emissions from the combustion of fuel gas in the pumps, heater-treaters, and generators are emitted without being treated with add-on controls. Storage tank evolved VOC's are controlled by the vapor recovery unit that is assumed to have an 80% duty factor. Surplus (or natural) fuel gas is flared.

III. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes (FS), and Rule 17-2, Florida Administrative Code (FAC).

Exxon's Raccoon Point production facility is located in Collier County. Collier County is currently designated as an attainment area for all criteria pollutants (17-2.420, FAC).

The application for construction/modification of air pollution sources (AC 11-112839) was received by the department on December 6, 1985. Completeness was met for this application on March 24, 1986. The original application and subsequent

permit AC 11-62020 for this minor facility were used to validate this determination and become part of this determination. Copies on this determination are on file at the department's offices in Tallahassee and Ft. Myers.

The facility, as proposed, is not subject to New Source Review under Prevention of Significant Deterioration (PSD) guidelines (17-2.500(2)(d)3, FAC) as it is a minor source and its increases in pollution are less than 250 tons per year (for any one criteria pollutant). It is located more than 10 km from a Class I Area (Everglades National Park) (17-2.500(2)(d)4, FAC).

The subject facility and proposed modifications shall be permitted under Section 17-2.520, "Sources Not Subject to PSD or Nonattainment Requirements".

IV. Air Quality Analysis

No ambient air monitoring or modeling by the applicant was required. The department has reasonable assurance that ambient air quality standards will be maintained.

V. Evaluation

This proposal continues to use the existing storage tanks (with vapor recovery system), and flare for surplus natural gas not used by operation of the various engines and heater-treaters of the facility.

Detailed review of the data supplied with the application necessitated adjustment of some emission calculations from those originally submitted. Calculations are based on the information supplied by the applicant as found complete March 24, 1986. Table 2 summarizes the proposed emissions. Note that the emissions from the stock tanks and flare listed in Table 2 are for modified production input and that the structure itself (& equipment) is unmodified from existing.

During 1985 the facility emissions were reduced. Table I shows current permitted emissions. Loading of oil in trucks was discontinued in favor of piping to a remote site for processing. Emissions from the stock tanks were controlled by the addition of a vapor recovery system.

The applicant states the expected operational factor of the vapor recovery system is 80%. Emissions from the storage tanks can be expected to be 63.24 TPY VOC. Thus, the allowable VOC emissions are reduced by:

Truck Loading	20.52 TPY VOC
Stock Storage Tanks	94.86 TPY VOC
<u>Total</u>	<u>115.38 TPY VOC</u>

Calculations are based on the information supplied by the applicant as found complete March 24, 1986. Table 2 summarizes the proposed emissions. Note that the emissions from the stock tanks and flare listed in Table 2 are for modified production input and that the structure itself (and equipment) is unmodified from existing.

VI. Conclusion

Based on a review of the information provided by Exxon Company, U.S.A., for modification of their Raccoon Point production facility, the Florida Department of Environmental Regulation concludes that compliance with all applicable state air regulations will be achieved provided certain specific conditions are met.

These specific conditions along with general conditions are contained in the proposed permit which is attached.

Table 1
Allowable Emissions for Original Facility (AO 11-62020)

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	12	0.0008	0.039	0.04	2.23	0.01	0.27	0.00018	0.009	0.0023	0.13
Pumping Unit	12	0.5890	30.935	2.397	126.0	0.3105	16.32	0.00175	0.021	--	--
Oil Loading Pump	2	0.1358	1.19	0.5502	4.83	0.0707	0.62	--	--	--	--
Saltwater Disposal Pump	2	0.1358	1.19	0.5502	4.83	0.0707	0.62	--	--	--	--
Circulating Pump	4	0.0348	0.61	0.1438	2.52	0.0182	0.32	--	--	--	--
Oil Pipeline Pump	1	0.5883	2.58	2.397	10.50	0.3105	1.36	--	--	--	--
Electric Generator	1	0.2100	0.92	0.8630	3.76	0.1095	0.48	--	--	--	--
Storage Tanks (6,000 Bbl)	-	36.0959	158.1	--	--	--	--	--	--	--	--
Oil Truck Loading	-	4.7	20.52	--	--	--	--	--	--	--	--
Flare	1	0	0	0	0	0	0	0	0	0	0
Allowable for Total Facility After 5/22/84 Revision			216.08		154.7		19.99		0.03		0.13

Table 2
Allowable Emissions for Facility after Proposed Modifications

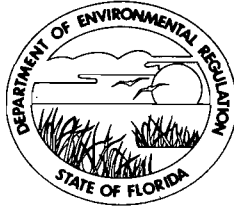
Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	26	0.001	0.09	0.04	4.56	0.01	1.14	0	0	0.002	0.26
Pumping Unit	25	0.588	64.50	2.40	262.47	0.31	34.00	0	0	--	--
Oil Loading Pump	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (Exist)	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Circulating Pump	2	0.035	0.30	0.14	1.26	0.02	0.16	0	0	--	--
Electric Gen. (Exist)	1	0.21	0.92	0.86	3.76	0.11	0.48	0	0	--	--
Electric Gen. (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Oil Pipeline Pump	2	0.588	5.15	2.40	21.00	0.31	2.72	0	0	--	--
Storage Tanks (1000 Bbl.)*	6	2.4	63.24	--	--	--	--	0	0	--	--
Flare**	1	--	0.73	--	17.25	--	3.92	0	0	--	--
Truck Oil Loading	0	--	--	--	--	--	--	0	0	--	--
Total			144.08		340.95		46.38		0		0.26
Previous emissions (AC 11-62020)			216.08		154.70		19.99		0.03		0.03
Change after Modification			(72.00)		186.25		27.19		(0.03)		0.23

*Average Annual Emissions (20% of 2 x 158.1 TPY)

**Estimated emissions for 5000 BOPD production

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Exxon Company, U.S.A.
P. O. Box 61707
New Orleans, LA 70161-1707

Permit Number: AC 11-112869
Expiration Date: June 30, 1987
County: Collier
Latitude/Longitude: 25° 58' 45"N
80° 54' 13"W
Project: Upscale Raccoon Point Facility
to 7,500 BOPD; & construction
of associated equipment

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. UTM coordinates of the site are Zone 17, 509.6 km East and 2873.2 km North.

Construction shall be in accordance with the attached permit application and additional materials except as otherwise noted on pages 5-7, Specific Conditions.

Attachments:

1. FDER construction permit AC 11-62020 issued April 17, 1983; revised August 13, 1984.
2. "Application to Construct Air Pollution Sources," FDER Form 17-1.122(16); received December 6, 1985.
3. C. H. Fancy's letter of January 3, 1986.
4. C. A. Martin's letter of February 4, 1986.
5. C. H. Fancy's letter of February 21, 1986.
6. C. A. Martin's letter of March 24, 1986.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees' of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Exxon Company U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Operation is continuous (8,760 hours annually).
2. Annual rate of oil production shall not exceed 2,737,500 BBL and 7,500 BBL oil per day (BOPD).
3. Annual gas throughput to flare shall not exceed 1.74348×10^8 SCF and 1.453×10^7 SCF per month.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

SPECIFIC CONDITIONS:

4. Emissions from the modified facility shall not exceed the following:

Table 2
Allowable Emissions for Facility after Proposed Modifications

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	26	0.001	0.09	0.04	4.56	0.01	1.14	0	0	0.002	0.26
Pumping Unit	25	0.588	64.50	2.40	262.47	0.31	34.00	0	0	--	--
Oil Loading Pump	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (Exist)	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Circulating Pump	2	0.035	0.30	0.14	1.26	0.02	0.16	0	0	--	--
Electric Gen. (Exist)	1	0.21	0.92	0.86	3.76	0.11	0.48	0	0	--	--
Electric Gen. (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Oil Pipeline Pump	2	0.588	5.15	2.40	21.00	0.31	2.72	0	0	--	--
Storage Tanks (1000 Bbl)*	6	2.4	63.24	--	--	--	--	0	0	--	--
Flare**	1	--	0.73	--	17.25	--	3.92	0	0	--	--
Truck Oil Loading	0	--	--	--	--	--	--	0	0	--	--
Total			144.08		340.95		46.38		0		0.26
Previous emissions (AC 11-62020)			216.08		154.70		19.99		0.03		0.03
Change after Modification			(72.00)		186.25		27.19		(0.03)		0.23

*Average Annual Emissions (20% of 2 x 158.1 TPY)

**Estimated emissions for 5000 BOPD production

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

SPECIFIC CONDITIONS:

5. Vapor recovery unit must be monitored by running time meter or operations recording such that duty factor of unit is maintained at ≥ 0.8 .
6. Compliance with emissions set forth in (4) above shall be based on $<10\%$ opacity as determined by DER Method 9, and a manner consistent with good air pollution practice for minimizing emissions. If visible emissions exceed 10% opacity, EPA test methods or other methods acceptable to this department must be used to determine the compliance of the affected source.
7. Proper maintenance of all equipment subject to this permit is required.
8. Reasonable precautions to prevent fugitive particulate emissions during construction, such as coating or spraying roads and construction sites used by work parties, will be taken by the permittee.
9. The construction shall reasonably conform to the specifications and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the department in writing 60 days prior to the expiration of this construction permit and submit a new schedule and request for an extension of the construction permit (Rule 17-4.09, FAC).
10. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's South Florida's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rule 17-4.22 and 17-4.23)
11. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a after receipt of a complete application. (FAC Rule 17-4.10)

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

SPECIFIC CONDITIONS:

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

4604

CHALLENGER 7 PROJECT

LONG

BROKEN STRING

"WHERE ANGELS SING"

MIRROR MAGES SOUND

GREEN SHELLEY 332-2153

BOB WHEEL

376-1688

(813) 305-9187

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

March 24, 1986

PRODUCTION DEPARTMENT
EASTERN DIVISION

Permit Application No. AC 11-112866

Mr. C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
MAR 25 1986
BAQM

Dear Mr. Fancy:


In accordance with your letter of February 21, 1986, we submit as a maximum yearly average facility throughput a rate of 7500 barrels of stock tank oil per day. Although maximum field production is forecasted at 5000 BOPD, the distinct possibility exists for discovery of one or more wells with production capability equal to the two existing 1000 BOPD producers. Production levels in such a case could exceed 5000 BOPD. This additional production could be handled by the proposed facility without modification and without associated emission increase.

It should be noted that the 5342 BOPD full wellstream inlet production rate noted in your letter is a computer-generated number corresponding to a metered 5000 BOPD stock tank production rate. Measurement technology does not exist to accurately meter a full wellstream inlet emulsion of oil, gas and up to 95% saltwater. Stock tank production is metered to a high degree of accuracy after heater treater separation. It is this stock tank production rate that is reported to various state agencies on a monthly basis. For the purposes of this permit, the throughput production allowable should be 7500 barrels of stock tank oil produced per day.

We trust this information will complete the permit application and enable processing to continue. Your assistance in expediting approval is appreciated.

Yours very truly,

EXXON CORPORATION

By 
Charles A. Martin
Permits/Surveillance Supervisor
Operations Accounting
Exxon Company, U.S.A.
(a division of Exxon Corporation)

WLP:bss

xc - Mr. David Knowles; DER; Ft. Myers, Florida
Mr. J. K. Flood
Mr. R. E. Schroeder

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

March 24, 1986

PRODUCTION DEPARTMENT
EASTERN DIVISION

Permit Application No. AC 11-112866 ⁹

Mr. C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
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By Charles A. Martin
Charles A. Martin
Permits/Surveillance Supervisor
Operations Accounting
Exxon Company, U.S.A.
(a division of Exxon Corporation)

WLP:bss

xc - Mr. David Knowles; DER; Ft. Myers, Florida
Mr. J. K. Flood
Mr. R. E. Schroeder

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

March 24, 1986

PRODUCTION DEPARTMENT
EASTERN DIVISION

Permit Application No. AC 11-112866

Mr. C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
MAR 25 1986
BAQM

Dear Mr. Fancy:

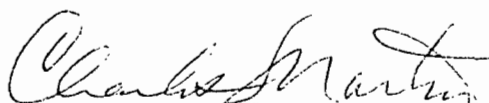
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EXXON CORPORATION

By 
Charles A. Martin
Permits/Surveillance Supervisor
Operations Accounting
Exxon Company, U.S.A.
(a division of Exxon Corporation)

WLP:bss

xc - Mr. David Knowles; DER; Ft. Myers, Florida
Mr. J. K. Flood
Mr. R. E. Schroeder

P 408 533 222

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. R. J. Koerner	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 2/24/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
Mr. R. J. Koerner
Exxon Company, U.S.A.
Post Office Box 61707
New Orleans, Louisiana 70161

4. Type of Service:	Article Number
<input type="checkbox"/> Registered	P 408 533 222
<input checked="" type="checkbox"/> Certified	
<input type="checkbox"/> Express Mail	
<input type="checkbox"/> Insured	
<input type="checkbox"/> COD	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Addressee
X

6. Signature — Agent
X *[Signature]*

7. Date of Delivery **FEB 27 1986**

8. Addressee's Address (ONLY, if requested and fee paid)

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. J. Koerner, Production Manager
Exxon Company, U.S.A. Eastern Division
P.O. Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Koerner:

Re: Permit Application No. AC 11-112869

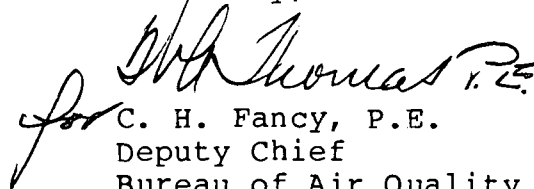
Your letter dated February 4, 1986, has been received by our Department. It does not adequately address the questions put to you in our letter of January 3, 1986.

In conversations with W. L. Palmer of your office the thoughtput rate was discussed at length. This figure must be given in writing if different than the 5,342 BOPD given in Section III A. of your original permit application. Otherwise, this will become an enforceable parameter of your permit.

Until adequate reply is received from your office on this matter the application will continue to be incomplete.

If there are further questions please write to the above address or call M. G. Phillips at (904) 488-1344.

Sincerely,

for 
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/MGP/p

cc: W. L. Palmer
David Knowles

FORM NO. 173-0063B

EXXON COMPANY, U.S.A.

A DIVISION OF EXXON CORPORATION

SOUTHEASTERN DIVISION

SETTLEMENT OF ACCOUNT

THE ATTACHED CHECK IS IN FULL PAYMENT FOR THE ITEMS SHOWN BELOW AND CONSTITUTES RECEIPT

DESCRIPTION

FEE FOR AIR PERMIT APPLICATION RACCOON POINT FIELD, FLORIDA, TANK BATTERY

JANUARY 30, 1986

FLORIDA DEPT. OF ENVIRONMENTAL REGULATION
2600 BLAIS STONE ROAD
TALLAHASSEE, FL 32301

\$1000.00

EXXON COMPANY, U.S.A.

A DIVISION OF EXXON CORPORATION

14-2
650

NEW ORLEANS, LOUISIANA JANUARY 30, 1986

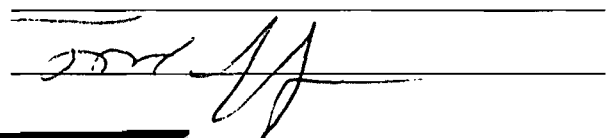
CHECK NUMBER
32648

PAY **ONE THOUSAND DOLLARS** \$ 1000.00

TO THE ORDER OF
FLORIDA DEPT. OF ENVIRONMENTAL REGULATION
2600 BLAIS STONE ROAD
TALLAHASSEE, FL 32301

SOUTHEASTERN DIVISION

THE FIRST NATIONAL BANK OF COMMERCE
IN NEW ORLEANS, LOUISIANA



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 76107

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Cayon Company, U. S. A. Date Feb. 6, 1986

Address P.O. Box 1909, New Orleans, LA 70161-1909 Dollars \$ 1,000.00

Applicant Name & Address Same as above.

Source of Revenue _____

Revenue Code 001031 Application Number AC 11-112 869

By Patricia B. Adams

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

PRODUCTION DEPARTMENT
EASTERN DIVISION

February 4, 1986

Permit Application No. AC 11-11286~~8~~9

Mr. C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER

FEB 5 1986

BAQM

Dear Mr. Fancy:

As requested in your letter of January 3, 1986, attached are the following items concerning the referenced permit application:

1. Revised Exxon Drawing No. PDE-204-1 illustrating the existing and proposed emission sources at the Tank Battery with a process mass balance at current rates and projected throughputs.
2. Available subsurface Sunniland Reservoir fluid analyses of the Raccoon Point 34-4 and 27-3 wells indicating 0.00 Mol Percent Hydrogen Sulfide.
 - a. Well Completion Reports (DNR Form 9, Rule 16C-28.10) for capable Raccoon Point Field wells certifying all wells are producing from the Sunniland Formation.
3. Gas analyses utilized in creating the "Gas Physical Properties", Exhibit VI of the application.
 - a. Analysis No. 64924: Flare gas - The source for this analysis is also the source of all fuel gas and blanket gas used by the field. The gas from all wells is commingled into a common gas supply. Fuel gas is supplied to storage tanks as "blanket gas" to maintain a minimum working pressure. Any fuel gas not used in engines or treaters is flared.


Mr. C. H. Fancy, P. E.
Page 2

- b. Analysis No. 62714: Stock tank oil and gas samples - These analyses are representative of the crude shipped through the pipeline and the gas evolved as the oil stabilizes in the storage tanks.

4. Application fee

Yours very truly,

EXXON CORPORATION

By 
Charles A. Martin
Permits/Surveillance Supervisor
Operations Accounting
Exxon Company, U.S.A.
(a division of Exxon Corporation)

WLP:bss

xc - w/attachments
Mr. David Knowles
DER, Fort Myers, Florida

CORE LABORATORIES, INC.
Reservoir Fluid Analysis

Page 1 of 15

File RFL 850225

Company Exxon Company, U.S.A. Date Sampled 11/1/85
Well CLCC No. 34-4 County Collier
Field Racoon Point State Florida

FORMATION CHARACTERISTICS

Formation Name	<u>Sunniland</u>
Date First Well Completed	<u>June 1977</u>
Original Reservoir Pressure	<u>5100</u> PSIG @ <u> </u> Ft.
Original Produced Gas/Oil Ratio	<u>Unknown</u> SCF/Bbl
Production Rate	<u>N/A</u> Bbl/Day
Separator Pressure and Temperature	<u>N/A</u> PSIG <u>N/A</u> °F.
Oil Gravity at 60°F.	<u>25 - 26</u> °API
Datum	<u> </u> Ft. Subsea
Original Gas Cap	<u>None</u>

WELL CHARACTERISTICS

Elevation	<u>11.5</u>	Ft.
Total Depth	<u>12295</u>	Ft.
Producing Interval	<u>12221 - 12232</u>	Ft.
Tubing Size and Depth	<u>2 7/8</u> In. to <u> </u>	Ft.
Productivity Index	<u>N/A</u> Bbl/D/PSI @ <u>N/A</u> Bbl/Day	
Last Reservoir Pressure	<u>N/A</u> PSIG @ <u>N/A</u>	Ft.
Date	<u>N/A</u>	
Reservoir Temperature	<u>N/A</u> °F. @ <u>N/A</u>	Ft.
Status of Well	<u>N/A</u>	
Pressure Gauge	<u>N/A</u>	
Normal Production Rate	<u>145</u>	Bbl/Day
Gas/Oil Ratio	<u>N/A</u>	SCF/Bbl
Separator Pressure and Temperature	<u>35</u> PSIG, <u>N/A</u>	°F.
Base Pressure	<u>14.65</u>	PSIA
Well Making Water	<u>0</u>	% Cut

SAMPLING CONDITIONS

Sampled at	<u>9000</u>	Ft.
Status of Well	<u>SI</u>	
Gas/Oil Ratio	<u>N/A</u>	SCF/Bbl
Separator Pressure and Temperature	<u>N/A</u> PSIG, <u>N/A</u>	°F.
Tubing Pressure	<u>N/A</u>	PSIG
Casing Pressure	<u>N/A</u>	PSIG
Sampled by	<u>NL Erco</u>	
Type Sampler	<u>Bottomhole</u>	

REMARKS: Opening Pressure = 280 psia
Field Bubble point = 410 psia @ 78°F.

These analyses, opinions or interpretations are based on observations and material supplied by the client to whom, and for whose exclusive and confidential use, this report is made. The interpretations or opinions expressed represent the best judgement of Core Laboratories, Inc. (all errors and omissions excepted), but Core Laboratories, Inc. and its officers and employees, assume no responsibility and make no warranty or representations as to the productivity, proper operation, or profitability of any oil, gas or other mineral well or sand in connection with which such report is used or relied upon.

CORE LABORATORIES, INC.

Reservoir Fluid Analysis

Page 3 of 15File RFL 850225Well CLCC No. 34-4HYDROCARBON ANALYSIS OF RESERVOIR FLUID SAMPLE

<u>Component</u>	<u>Mol Percent</u>	<u>Weight Percent</u>
Hydrogen Sulfide	0.00	0.00
Carbon Dioxide	0.25	0.05
Nitrogen	0.07	0.01
Methane	7.17	0.54
Ethane	4.17	0.58
Propane	8.84	1.82
iso-Butane	1.84	0.50
n-Butane	5.16	1.40
iso-Pentane	2.48	0.83
n-Pentane	3.27	1.10
Hexanes	5.23	2.05
Heptanes	5.42	2.43
Octanes	5.36	2.68
Nonanes	4.61	2.60
Decanes plus	46.13	83.41
	<u>100.00</u>	<u>100.00</u>

Properties of Heptanes plus:

Density @ 60°F., gm/cc	0.9383
Gravity, °API @ 60°F.	19.2
Molecular Weight	318

CORE LABORATORIES, INC.
Reservoir Fluid Analysis

Page 1 of 15

File RFL 850224

Company Exxon Company, U.S.A. Date Sampled 10/31/85
Well CLCC No. 27-3 County Collier
Field Racoon Point State Florida

FORMATION CHARACTERISTICS

Formation Name	<u>Sunniland</u>
Date First Well Completed	<u>June 1977</u>
Original Reservoir Pressure	<u>5100 PSIG @ _____ Ft.</u>
Original Produced Gas/Oil Ratio	<u>Unknown SCF/Bbl</u>
Production Rate	<u>N/A Bbl/Day</u>
Separator Pressure and Temperature	<u>N/A PSIG N/A °F.</u>
Oil Gravity at 60°F.	<u>25 - 26 °API</u>
Datum	<u>_____ Ft. Subsea</u>
Original Gas Cap	<u>None</u>

WELL CHARACTERISTICS

Elevation	<u>12.8</u>	<u>Ft.</u>
Total Depth	<u>12035</u>	<u>Ft.</u>
Producing Interval	<u>11858 - 11873</u>	<u>Ft.</u>
Tubing Size and Depth	<u>2 7/8 In. to _____</u>	<u>Ft.</u>
Productivity Index	<u>N/A Bbl/D/PSI @ N/A Bbl/Day</u>	
Last Reservoir Pressure	<u>4958 PSIG @ 11865</u>	<u>Ft.</u>
Date	<u>12/29/84</u>	
Reservoir Temperature	<u>170 °F. @ 11304</u>	<u>Ft.</u>
Status of Well	<u>SI -- Buildup Test</u>	
Pressure Gauge	<u>NL Sperry Sun MRPG</u>	
Normal Production Rate	<u>855</u>	<u>Bbl/Day</u>
Gas/Oil Ratio	<u>N/A</u>	<u>SCF/Bbl</u>
Separator Pressure and Temperature	<u>35 PSIG, N/A</u>	<u>°F.</u>
Base Pressure	<u>14.65</u>	<u>PSIA</u>
Well Making Water	<u>3</u>	<u>% Cut</u>

SAMPLING CONDITIONS

Sampled at	<u>11000</u>	<u>Ft.</u>
Status of Well	<u>SI</u>	
Gas/Oil Ratio	<u>N/A</u>	<u>SCF/Bbl</u>
Separator Pressure and Temperature	<u>N/A PSIG, N/A</u>	<u>°F.</u>
Tubing Pressure	<u>N/A</u>	<u>PSIG</u>
Casing Pressure	<u>N/A</u>	<u>PSIG</u>
Sampled by	<u>NL Erco</u>	
Type Sampler	<u>Bottomhole</u>	

REMARKS: Opening Pressure = 490 psia
Field Bubble Point = 380 psia at 72°F.

CORE LABORATORIES, INC
Reservoir Fluid Analysis

Page 3 of 15

File RFL 850224

Well CLCC No. 27-3

HYDROCARBON ANALYSIS OF RESERVOIR FLUID SAMPLE

<u>Component</u>	<u>Mol Percent</u>	<u>Weight Percent</u>
Hydrogen Sulfide	0.00	0.00
Carbon Dioxide	0.22	0.05
Nitrogen	0.08	0.01
Methane	6.96	0.52
Ethane	4.25	0.59
Propane	8.34	1.69
iso-Butane	1.81	0.48
n-Butane	5.08	1.36
iso-Pentane	2.46	0.81
n-Pentane	3.06	1.02
Hexanes	4.77	1.88
Heptanes	5.32	2.40
Octanes	5.21	2.62
Nonanes	4.56	2.60
Decanes plus	<u>47.88</u>	<u>83.97</u>
	100.00	100.00

Heptanes plus properties:

Density @ 60°F., gm/cc	0.9361
Gravity, °API @ 60°F.	19.5
Molecular Weight	316

These analyses, opinions or interpretations are based on observations and material supplied by the client to whom, and for whose exclusive and confidential use, this report is made. The interpretations or opinions expressed represent the best judgement of Core Laboratories, Inc. (all errors and omissions excepted); but Core Laboratories, Inc. and its officers and employees, assume no responsibility and make no warranty or representations as to the productivity, proper operation, or profitability of any oil, gas or other mineral well or sand in connection with which such report is used or relied upon.

**WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)**

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? First Production

Permit No. 1141

A.P.I. No. 09-021-20180

Field: Raccoon Point

Operator: Exxon Corporation

Lease: Collier Land & Cattle Corp

Well No.: #2-1

Type of Well (Oil or Gas): Oil

County: Collier

Section: 2 T. 52S R. 34E

* Well located _____ feet from _____ line
and _____ feet from _____ line

Date Completed: 10/1/85

Flowing or Pumping: Flowing

Production Horizon: Sunniland

Producing From: 12578' To: 12592'

Perforated From: 12578' To: 12592'

Oil String Size: 7" Seat: 12439'
4 1/2" 12709'

Tubing Size: 2 7/8" Bottom: 11780'

Total Depth: 12712' MD; 11,464' TVD

Elevation: D.F. 34.1 K.B. 35.6 G.L. 11.7

Type of Subsurface Safety Device: -----

Depth Set: -----

* B.H. Loc. : 415' SNL; 3318' EWL
Surface Loc. : 707' EWL; 723' SNL
Sec. 2, T52S, R34E

Gauged By: Mike Garrett Temp. Operator _____
(Name) (Title)

Witnessed By: ----- _____
(Name) (Title)

TEST DATA

Time Gauged or Metered: 9/28/85 (Test Date)

Opening Tank Guage: ----- Ft. ----- In.

Closing Tank Guage: ----- Ft. ----- In.

Difference: ----- Ft. ----- In.

Volume Metered: -----

Tank Co-Eff. (Bbls./In.) -----

Oil: 95 Bbls. Per 17 Hrs.

Salt water: 4 Bbls. Per 17 Hrs.

Oil: 134 Est. Bbls. Per Day

Choke Size: 26/64" Type: -----

If Pumping, Strokes/Min.: -----

Daily Gas Volume: ----- M.C.F. -----

Gas Oil Ratio: -----

Tubing Pressure: 55 psi

Casing Pressure: 0 psi

Volume or Percent B.S. & W. 4%

Corrected Gravity: 25.5 A.P.I.: -----

* Amount of Oil Produced Prior Time Test Started: _____

BHSI Pressure: -----

* 400-500 bbl. (est.), swabbing

AFFIDAVIT

REV. & REG. ACCTG. - PERMITS
First Production or Retest - Florida Form 9

Orig. to Dr. Walter Schmidt (DNR)
xc: South Florida - Mr. R.S. Caughey (DNR)
North Florida - Mr. C.V. Babcock (DNR)

B. W. Evans
L. E. Vollmer (BY HAND IF NGPA)

D. M. Hurley c - Petro-Lewis Corp.
F. W. Geisendorff (Jay/LEC)

M. T. Lee
Susan Doar

James V. Hooten, Exxon Company, U.S.A.
P.O. Box 1076, Jackson, MS 39205
Well File

State of Louisiana

County of Orleans

Before me personally appeared Charles Martin who being duly sworn deposes and says:
He is the Permits/Surveillance Supervisor of Exxon Company U.S.A. (a div. of Exxon Corp.)
Title Company

and the above statements are a true reflection of the records of Exxon Company U.S.A. (a div. of Exxon Corp.)
Company

Charles Martin Permits/Surveillance Supv.
Name Title

Sworn to and subscribed before me this 3rd day of October, 19 85

James V. Hooten
Notary Public

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth
1 1/16	Schlumberger Perf. Gun	4 SPF	4-29-85	12578-12592'
--	28% HCL	24 bbls.	4-30-85	12578-12592'

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? RETEST

Permit No. 997

A.P.I. No. 09-021-20131

Field: Raccoon Point

Operator: Exxon Corporation

Lease: Oleum Corporation

Well No.: 2-2

Type of Well (Oil or Gas): Oil

County: Collier

Section: 2 T. 52S R. 34E

B.H. Well located 1306.2' feet from North line
and 1343.2' feet from West line

Date Completed: 10/25/83

Flowing or Pumping: Pumping

Production Horizon: Sunniland

Producing From: 11,526' To: 11,538'

Perforated From: 11,526' To: 11,538'

Oil String Size: 7" Seat: 11,500'

Tubing Size: 2-7/8" & 2-3/8" Bottom: 11,518'

Total Depth: 11,805' MD; 11,611' TVD; 11,539' PBD

Elevation: D.F. 34.2' K.B. 36.2' G.L. 11.3'

Type of Subsurface Safety Device: N/A

Depth Set: N/A

Surf. Loc.: 423.8' S of the N/L and 670.1' E of the W/L of Sec. 2, T52S, R34E.

TEST DATA

Time Gauged or Metered: 1:00 PM - 1:00 PM 10/24/83

Opening Tank Gauge: 1 Ft. 6-1/2 In.

Closing Tank Gauge: 3 Ft. 3-1/2 In.

Difference: 2 Ft. 3 In.

Volume Metered: N/A

Tank Co-Eff. (Bbls./In.) 5.42

Oil: 113.96 Bbls. Per 24 Hrs.

Salt water: 275 Bbls. Per 24 Hrs.

Oil: 113.96 Est. Bbls. Per Day

Choke Size: N/A Type: _____

If Pumping, Strokes/Min.: 6

Daily Gas Volume: N/A M.C.F. _____

Gas Oil Ratio: N/A

Tubing Pressure: 0

Casing Pressure: 0

Volume or Percent B.S. & W. 70.7%

Corrected Gravity: 23.7 A.P.I.: _____

Amount of Oil Produced Prior Time Test Started: 250 bbls.

BHSI Pressure: Not Available Yet

Gauged By: Greg Ammons Operator
(Name) (Title)

Witnessed By: John Brown Field Foreman
(Name) (Title)

djr

AFFIDAVIT

State of Louisiana

~~Parish~~ Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:

He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation

Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 26th day of October, 19 83

Audrey G. Bruce
Notary Public

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth

REVENUE & REGULATORY ACCTG. - PERMITS
First Production or Retest Florida Form 9

Orig. to Mr. Charles W. Hendry, Jr.

xc: South Florida

Mr. R. S. Caughey, Dept. of Natural Resources
 State of Florida, P.O. Box 4267
 North Ft. Myers, FL 33903

North Florida

Mr. C. V. Babcock, Dept. of Natural Resources
 State of Florida, P. O. Box 306
 Jay, FL 32565

c - R. Hagans

B. W. Evans (Pensacola)
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 L. E. Vollmer (BY HAND IF NGPA)

S. Stahlman
 Donna M. Hurley
 M. T. Lee
 Well File

*10/26/83
 [Signature]*

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? RETEST

Permit No. 998

A.P.I. No. 09-021-20132

Field: Raccoon Point
 Operator: Exxon Corporation
 Lease: Oleum Corporation
 Well No.: 2-3
 Type of Well (Oil or Gas): Oil
 County: Collier
 Section: 2 T. 52S R. 34E
 BH Well located 3941.1 feet from North line
 and 1596.7' feet from West line
 Date Completed: 3/27/84
 Flowing or Pumping: Pumping
 Production Horizon: Sunniland
 Producing From: 12,721' To: 12,731'
 Perforated From: 12,721' To: 12,731'
 Oil String Size: 7" Seat: 12,650.75'
 Tubing Size: 2-7/8" Bottom: 7000'
 Total Depth: 12,758' MD 11,428' TVD
 Elevation: D.F. --- K.B. --- G.L. ---
 Type of Subsurface Safety Device: ---
 Depth Set: ---

TEST DATA

Time Gauged or Metered: 7:30 AM
 Opening Tank Gauge: --- Ft. --- In.
 Closing Tank Gauge: --- Ft. --- In.
 Difference: --- Ft. --- In.
 Volume Metered: 34.8
 Tank Co-Eff. (Bbls./In.) ---
 Oil: 34 Bbls. Per 24 Hrs.
 Salt water: 342 Bbls. Per 24 Hrs.
 Oil: 34 Est. Bbls. Per Day
 Choke Size: 64/64 Type: Adjustable
 If Pumping, Strokes/Min.: 7.5
 Daily Gas Volume: --- M.C.F.
 Gas Oil Ratio: ---
 Tubing Pressure: 50
 Casing Pressure: 40
 Volume or Percent B.S. & W. 90.9%
 Corrected Gravity: 23.6 A.P.I.: 600
 Amount of Oil Produced Prior Time Test Started: 254
 BHSI Pressure: ---

Gauged By: Robert Ford Operator
 (Name) (Title)
 Witnessed By: Larry Holley Field Foreman
 (Name) (Title)

AFFIDAVIT

State of Louisiana
~~County~~ Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:
 He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
 Title Company
 and the above statements are a true reflection of the records of Exxon Corporation
 Name Title
Charles A. Martin Rev. & Reg. Acctg. Superv.
 Name Title

Sworn to and subscribed before me this 30th day of March, 19 84
Audrey G. Bruner
 Notary Public

djr

(Over) Audrey G. Bruner Notary Public
 Orleans Parish, Louisiana
 My commission expires at death.

CHEMICAL OR SHOOTING RECD

Size	Chemical or Explosive Used	Quantity	Date	Depth
	Class H cmt. + add.	5 bbls.	11/21/83	12,713-733'
	Class H cmt. + add.	5 bbls.	11/28/83	12,740-743'
2-1/8"	Hyperdome Perf. Gun	4 SPF	12/1/83	12,713' - 12,733'
	15% HCL Acid	1000 gals.	12/2/83	"

REVENUE & REGULATORY ACCTG. - PERMITS
First Production or Retest Florida Form 9

Orig. to Mr. Charles W. Hendry, Jr.

xc: South Florida

Mr. R. S. Caughey, Dept. of Natural Resources
 State of Florida, P.O. Box 4267
 North Ft. Myers, FL 33903

North Florida c - F. W. Geisendorff
 Mr. C. V. Babcock, Dept. of Natural Resources
 State of Florida, P. O. Box 306
 Jay, FL 32565

c - R. Hagans
 B. W. Evans (Pensacola)
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 Donna M. Hurley
 M. T. Lee
 Well File

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? First

Permit No. 1149

A.P.I. No. 09-021-20179

Field: Raccoon Point

Operator: Exxon Corporation

Lease: Collier Land & Cattle Corp.

Well No. #27-3

Type of Well (Oil or Gas): Oil

County: Collier

Section: 27 T. 51S R. 34E

Well located B.H.: 897' feet from South line

and 1394' feet from West line

Surf.: W 796.8' ort. angles to E/L & N 1821.9'

ort. angles to S/L of Sec. 28, T51S, R34E

Date Completed: 1/10/85

Flowing or Pumping: Flowing

Production Horizon: Sunniland

Producing From: 11,858' To: 11,873'

Perforated From: 11,858' To: 11,873'

Oil String Size: *7" Seat: 11,810'

Tubing Size: 2-7/8" Bottom: 11,700'

Total Depth: 12,035' MD; 11,530' TVD

Elevation: D.F. 34.9 K.B. 36.5 G.L. 12.8

Type of Subsurface Safety Device: SSSV

Depth Set: 6000'

*4-1/2" - 11,423-12,035'
Liner

TEST DATA

Time Gauged or Metered: 10:30 A.M. (1/11/85)

Opening Tank Gauge: 1 Ft. 10 In.

Closing Tank Gauge: 15 Ft. 3 In.

Difference: 13 Ft. 5 In.

Volume Metered: 872 bbls.

Tank Co-Eff. (Bbls./In.) ---

Oil: 872 Bbls. Per 24 Hrs.

Salt water: 0 Bbls. Per --- Hrs.

Oil: 872 Est. Bbls. Per Day

Choke Size: 14/64 Type: Adjustable

If Pumping, Strokes/Min.: ---

Daily Gas Volume: -0- M.C.F.

Gas Oil Ratio: ---

Tubing Pressure: 390 psig

Casing Pressure: -0- psig

Volume or Percent B.S. & W. 0.1%

Corrected Gravity: 25.4 A.P.I.: ---

Amount of Oil Produced Prior Time Test Started: ---

BHSI Pressure: ---

Gauged By: Robert Ford Operator
(Name) (Title)

Witnessed By: ---
(Name) (Title)

AFFIDAVIT

State of Louisiana

County of Orleans Parish

Before me personally appeared M. S. Matthews who being duly sworn deposes and says:

He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Company

M S Matthews Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 16th day of January, 19 85

Audrey G. Bruce
Notary Public

(Over) Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth
1-11/16"	Pert. gun	4 SPF	12/21/85	11,858-873'
	15% HCL	41 bbls.	12/23/85	11,858-873'

REV. & REG. ACTG. - PERMITS
 First Production or Retest - Florida Form 9
 Orig. to Mr. Steve Windham (DNR)
 xc: South Florida - Mr. R.S. Caughey(DNR)
 North Florida - Mr. C.V. Babcock(DNR)
 B. W. Evans
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 D. M. Hurley
 F. W. Geisendorff
 M. T. Lee
 Susan Doar
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 Well file

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? First Production

Permit No. 1150

A.P.I. No. 09-021-20183

Field: Raccoon Point

Operator: Exxon Corporation

Lease: Collier Land & Cattle Corp.

Well No. 28-4

Type of Well (Oil or Gas): Oil

County: Collier

Section: 28 T. 51S R. 34E

* Well located feet from line

and feet from line

Date Completed: 11/10/85

Flowing or Pumping: Pumping

Production Horizon: Sunniland

Producing From: 11438' To: 11457'

Perforated From: 11438' To: 11457'

Oil String Size: 4 1/2 Seat:

Tubing Size: 2 7/8" Bottom: 9000'

Total Depth: 11600' MD 11538' TVD

Elevation: D.F. 34.9' K.B. 35.9' C.L. 12.8'

Type of Subsurface Safety Device:

Depth Set:

* Surf Loc: W'ly 809.3' @rt. angles to E/L & N'ly 1651.0' @rt. angles to S/L of Sec.28, T51S, R34E.

* B.H. Loc: W'ly 1199.30' @rt. angles to E/L & N'ly 1430.7' @rt. angles to S/L Sec.28, T51S, R34E.

Gauged By: Mike Wickenden
(Name)

Operator
(Title)

Witnessed By: N/A
(Name)

N/A

REV. & REG. ACCTG. - PERMITS
First Production or Retest - Florida Form 9

Orig. to Dr. Walter Schmidt (DNR)
xc: South Florida - Mr. R.S. Caughey (DNR)
North Florida - Mr. C.V. Babcock (DNR)

B. W. Evans
L. E. Vollmer (BY HAND IF NGPA)

D. M. Hurley
F. W. Geisendorff (Jay/LEC)

M. T. Lee
Susan Doar

James V. Hooten, Exxon Company, U.S.A.
P.O. Box 1076, Jackson, MS 39205
Well File

who being duly sworn deposes and says:

Before me personally appeared Charles Martin
Name

He is the Permits/Surveillance Supv. of Exxon Company, U.S.A. (a div. of Exxon Corporation)
Title Company

and the above statements are a true reflection of the records of Exxon Company, U.S.A. (a div. of Exxon Corporation)
Company

Charles Martin
Name Title

Sworn to and subscribed before me this 19th day of November, 1985

Audrey G. Bruce
Notary Public

(Over)

Audrey G. Bruce, Notary Public
Greens Parish, Louisiana
My Commission expires at death.

TEST DATA

Time Gauged or Metered: 11/11/85 (Test date)

Opening Tank Gauge: Ft. In.

Closing Tank Gauge: Ft. In.

Difference: Ft. In.

Volume Metered:

Tank Co-Eff. (Bbls./In.)

Oil: 77 Bbls. Per 24 Hrs.

Salt water: 51 Bbls. Per 24 Hrs.

Oil: 77 Est. Bbls. Per Day

Choke Size: Type:

If Pumping, Strokes/Min.: 6 1/2

Daily Gas Volume: M.C.F.

Gas Oil Ratio:

Tubing Pressure: 92psi

Casing Pressure:

Volume or Percent B.S. & W. 40%

Corrected Gravity: A.P.I.:

Amount of Oil Produced Prior Time Test Started: 93.4 bbls.

BHSI Pressure: 4900psi (est.)

BEST AVAILABLE COPY

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth
1 1/16"	McCullough perf gun	4 spf	8-16-85	11474-477'
			8-16-85	11477-300'
1 1/16"	McCullough perf gun	4 spf	9-8-85	11438-449', 11452-457'
	15% HCl	3000 gals.	9-8-85	11438-449', 11452-457'

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

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Is this a first production or retest report? RETEST

Permit No. 915

A.P.I. No. 09-021-20112

Field: Raccoon Point
Operator: Exxon Corporation
Lease: Oleum Corporation
Well No.: 33-1
Type of Well (Oil or Gas): Oil
County: Collier
Section: 33 T. 51S R. 34E
B.H. Well located 1342.8 feet from East line
and 1314.7 feet from North line
Date Completed: 3/5/84
Flowing or Pumping: Pumping
Production Horizon: Sunniland
Producing From: 12,474-12,492' & 12,502-12,506'
Perforated From: 12,474-12,492' & 12,502-12,506'
Oil String Size: 7" Seat: 12,398'
Tubing Size: 2-3/8" & 2-7/8" Bottom: 12,502'
Total Depth: 12,550'
Elevation: D.F. --- K.B. --- G.L. ---
Type of Subsurface Safety Device: ---
Depth Set: ---

TEST DATA

Time Gauged or Metered: 8:00 AM - 8:00 AM 3/5/84
Opening Tank Gauge: 4 Ft. 2 In.
Closing Tank Gauge: 8 Ft. 6-3/4 In.
Difference: 4 Ft. 4-3/4 In.
Volume Metered: ---
Tank Co-Eff. (Bbls./In.) 5.42
Oil: 283 Bbls. Per 24 Hrs.
Salt water: 172 Bbls. Per 24 Hrs.
Oil: 283 Est. Bbls. Per Day
Choke Size: 64/64 Type: Adjustable
If Pumping, Strokes/Min.: 6
Daily Gas Volume: --- M.C.F.
Gas Oil Ratio: ---
Tubing Pressure: 50
Casing Pressure: 30
Volume or Percent B.S. & W. 38%
Corrected Gravity: 21.1 A.P.I.: 60°
Amount of Oil Produced Prior Time Test Started: 575 bbls.
BHSI Pressure: ---

Gauged By: Robert Ford
(Name)

Lease Operator
(Title)

Witnessed By: Allen Alderman
(Name)

Field Foreman
(Title)

AFFIDAVIT

State of Louisiana
~~XXXXXXXX~~ Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:

He is the Rev. & Reg. Superv. Acctg. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 9th day of March, 19 84

Audrey G. Bruce
Notary Public

djr

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth

REVENUE & REGULATORY ACCTG. - PERMITS
First Production or Retest Florida Form 9

Orig. to Mr. Charles W. Hendry, Jr.

xc: South Florida

Mr. R. S. Caughey, Dept. of Natural Resources
 State of Florida, P.O. Box 4267
 North Ft. Myers, FL 33903

North Florida c - F. W. Geisendorff
 Mr. C. V. Babcock, Dept. of Natural Resources
 State of Florida, P. O. Box 306
 Jay, FL 32565

c - R. Hagans
 B. W. Evans (Pensacola)

James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205

L. E. Vollmer (BY HAND IF NGPA)

S. Stahlman

Donna M. Hurley

M. T. Lee

Well File

3/9/84
 gsc

FIRST PRODUCTION OR RETEST REPORT

INSTRUCTIONS: This is to be filed in the office of Oil and Gas Administrator within 5 days after test.

Is this a first production or retest report? Retest

Permit No. 829
A. P. I. No. 09-021-20067

INSTRUCTIONS: This report shall be filed with the Department in order that an allowable may be assigned to the well. The allowable will be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Field: Raccoon Point Area (Airport Area)
Operator: Exxon Corporation
Lease: Oleum Corp.
Well No.: 33-4
Type of Well (Oil or Gas): Oil
County: Collier
Section: 33 T. 51S R. 34E
Location in Section: From SE/C of Sect. 33, W'ly
1235.3' along S/L Sect. 33; thence N'ly
1068.7' @ rt. angles to location.

TEST DATA

Time Gauged or Metered: April 23, 1979 (24 hours)
Opening Tank Gauge: 1 Ft. 0 In.
Closing Tank Gauge: 1 Ft. 10-3/4 In.
Difference: 0 Ft. 10-3/4 In.
Volume Metered: 58.3 BO + 825 BSW = 883.3
Tank Co. Eff. (Bbls./In.) 5.42
Oil: 58.3 Bbls. Per 24 Hrs.
Salt water: 825 Bbls. Per 24 Hrs.
Oil: 58.3 Est. Bbls. Per Day
Choke Size: None Type: ---
If Pumping, Strokes/Min.: 9 1/2
Daily Gas Volume: 0 M. C. F.
Gas Oil Ratio: ---
Tubing Pressure: 0
Casing Pressure: 0
Volume or Percent B.S. & W. 93.4%
Corrected Gravity: 23.3 A. P. I.: @ 60° F
Amount of Oil Produced Prior Time Test Started: 2128 bbls.
B H S I Pressure 5195 psi on 6/29/77

Date Completed: Operations suspended 4/24/79.
Flowing or Pumping: Pumping
Production Horizon: Sunniland
Producing From: 11,410' To: 11,414'
Perforated From: 11,410' To: 11,414'
Oil String Size: 7" Seat: 11.650'
Tubing Size: 2-7/8" Bottom: 4.016'
Total Depth: 11,658'
Elevation: D.F. 39.0' K.B. 12' G.L.

Gauged By: Brvan Allen Acting Lease Operator
(Name) (Title)
Witnessed By: Lee Robertson Drilling Technician
(Name) (Title)

Handwritten note: 4 23 79 to be filed - see well log file # 2 for details
6-25-78

AFFIDAVIT

State of Louisiana
County of Orleans Parish

Before me personally appeared R. J. Dervelov, Jr. who being duly sworn deposes and says:
Name

He is the Revenue & Regulatory Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Company

R. J. Dervelov, Jr. Revenue & Regulatory
Name Title
Acctg. Superv.

Sworn to and subscribed before me this 27 day of April, 1979.

Andrey G. Bruce
Notary Public

Andrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

/sk

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? First Production Permit No. 1130

A.P.I. No. 09-021-20176

**Amended to show safety device *20178*

Field: Raccoon Point
Operator: Exxon Corporation
Lease: Collier Land & Cattle Corp.
Well No.: 34-1
Type of Well (Oil or Gas): Oil
County: Collier
Section: 34 T. 51S R. 34E
Well located 1322.5' feet from North line
and 1332.5' feet from East line
surf. 1603.0' N of the S/L & 1816.3' E of W/L of
Sec. 35 T. 51S R. 34E
Date Completed: 9/13/84
Flowing or Pumping: Flowing
Production Horizon: Sunniland
Producing From: 13,082' To: 13,109'
Perforated From: 13,082' To: 13,109' EI
* Oil String Size: 7" Seat: 13,023'
Tubing Size: 2-7/8" Bottom: 13,090'
Total Depth: 13,258'
Elevation: D.F. 33.0' NGVD K.B. 34.0' NGVD G.L. 118' NGVD
** Type of Subsurface Safety Device: SSSV
** Depth Set: 6108'

TEST DATA

Time Gauged or Metered: 10:30 AM
Opening Tank Guage: 1 Ft. 4-3/4 In.
Closing Tank Guage: 11 Ft. 6-3/4 In.
Difference: 10 Ft. 2 In.
Volume Metered: ---
Tank Co-Eff. (Bbls./In.) 5.40 bbl/in.
Oil: 659 Bbls. Per 24 Hrs.
Salt water: 0 Bbls. Per 24 Hrs.
Oil: 659 Est. Bbls. Per Day
Choke Size: 13/64 Type: ---
If Pumping, Strokes/Min.: ---
Daily Gas Volume: --- M.C.F. ---
Gas Oil Ratio: ---
Tubing Pressure: 550 psig
Casing Pressure: 10 psig
Volume or Percent B.S. & W. Trace
Corrected Gravity: 24.1° A.P.I.: ---
Amount of Oil Produced Prior Time Test Started: 1334 bbls.
BHSI Pressure: ---

*4-1/2" Liner set 12,586-13,253'

Gauged By: Kenneth Jackson Operator
(Name) (Title)
Witnessed By: John Brown Field Foreman
(Name) (Title)

AFFIDAVIT

State of Louisiana
XX Orleans Parish XX

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:
He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Company Charles A. Martin
Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 29th day of October, 19 84

Audrey G. Bruce
Notary Public

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth
2-1/8"	Hyperdome perf. gun	2 SPF	9/3/84	13,082-13,109'
	15% HCL	65 bbls.	9/6/84	13,082-13,109'

REV. & REG. ACCTG. - PERMITS
 First Production or Retest - Florida Form 9
 Orig. to Mr. Steve Windham (DNR)
 xc: South Florida - Mr. R.S. Caughey(DNR)
 North Florida - Mr. C.V. Babcock(DNR)
 B. W. Evans
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 D. M. Hurley
 F. W. Getsendorff
 M. T. Lee
 Janice Salaticch
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 Well file

DNR 51-005(16)
 Revised 10-81

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowables may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? Recompletion

Permit No. 1031

A.P.I. No. 09-021-20146

Field: Raccoon Point

Operator: Exxon Corporation

Lease: Oleum Corporation

Well No.: 34-2

Type of Well (Oil or Gas): Oil

County: Collier

Section: 34 T. 51S R. 34E

B.H. Well located 2939.86 feet from South line
and 775.18 feet from West line
surf.: 1049.9' NSL & 1062.9' WEL Sec. 33, T51S, 34E

Date Completed: 10/17/83

Flowing or Pumping: Flowing

Production Horizon: Sunniland - "C" Zone

Producing From: 12,070' To: 12,075'

Perforated From: 12,070' To: 12,075'

Oil String Size: 7" Seat: 12,024

Tubing Size: 2-7/8" & 2-3/8" Bottom: 12,084'

Total Depth: 12,095' MD; 11,413' TVD

Elevation: D.F. 37.3' K.B. 39.3' G.L. 11.6'

Type of Subsurface Safety Device: ---

Depth Set: ---

* TEST DATA

Time Gauged or Metered: 10/17/83 9:00 AM - 5:00 PM

Opening Tank Gauge: 6 Ft. 1-1/2 In.

Closing Tank Gauge: 8 Ft. 10 In.

Difference: 2 Ft. 8-1/2 In.

Volume Metered: 176.15

Tank Co-Eff. (Bbls./In.) 5.42

Oil: 176.15 Bbls. Per 8 Hrs.

Salt water: 1 Bbls. Per 8 Hrs.

Oil: 528.45 Est. Bbls. Per Day

Choke Size: 8/64 Type: Adjustable

If Pumping, Strokes/Min.: ---

Daily Gas Volume: --- M.C.F. ---

Gas Oil Ratio: ---

Tubing Pressure: 110

Casing Pressure: 0

Volume or Percent B.S. & W. .6

Corrected Gravity: 24.1 A.P.I.: ---

Amount of Oil Produced Prior Time Test Started: 396 bbls.

BHSI Pressure: 0

* Facility limited and is not indicative of the well's capability.

Gauged By: Larry Holley
(Name)

Field Foreman
(Title)

Witnessed By: Paul Garvin
(Name)

Construction Foreman
(Title)

AFFIDAVIT

State of Louisiana

~~County of~~ Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:

He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation

and the above statements are a true reflection of the records of Exxon Corporation

Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 21st day of October, 19 83

Audrey G. Bruce
Notary Public

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? First

Permit No. 1061

A.P.I. No. 09-021-20158

Field: Raccoon Point

TEST DATA

Operator: Exxon Corporation

Lease: Oléum Corporation

Well No.: 34-3

Type of Well (Oil or Gas): Oil

County: Collier

Section: 34 T. 51S R. 34E

Surface Well located 1030.5 feet from South line

and 813.7 feet from East line

Sec. 33, T51S, R34E

Date Completed: Working on well

Flowing or Pumping: Pumping

Production Horizon: Sunniland

Producing From: 11,866' To: 11,886'

Perforated From: 11,866' To: 11,886'

Oil String Size: 7" Seat: 11,822'

Tubing Size: 2-7/8" Bottom: 9530'

Total Depth: 11,980' MD; 11,457' TVD

Elevation: D.F. 33.5' K.B. 34.5' G.L. 11.6'

Type of Subsurface Safety Device: ---

Depth Set: ---

Time Gauged or Metered: 8:00 AM 6/24-8:00AM 6/25/84

Opening Tank Gauge: --- Ft. --- In.

Closing Tank Gauge: --- Ft. --- In.

Difference: --- Ft. --- In.

Volume Metered: 75.1 bbls.

Tank Co-Eff. (Bbls./In.) ---

Oil: 74 Bbls. Per 24 Hrs.

Salt water: 145 Bbls. Per 24 Hrs.

Oil: 74 Est. Bbls. Per Day

Choke Size: --- Type: ---

If Pumping, Strokes/Min.: 9.5

Daily Gas Volume: --- M.C.F.

Gas Oil Ratio: ---

Tubing Pressure: 40 psig

Casing Pressure: 0

Volume or Percent B.S. & W. 66%

Corrected Gravity: 25.9 A.P.I.: 60°

Amount of Oil Produced Prior Time Test Started: 410 bbls.

BHSI Pressure: ---

BOTTOM HOLE LOCATION: North 27' and East 2201' from surface location.

Gauged By: Robert Ford Operator
(Name) (Title)

Witnessed By: _____
(Name) (Title)

AFFIDAVIT

State of Louisiana

XXXXXXXXXX Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:

He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Company

Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 27th day of June, 19 84

Audrey G. Bruce
Notary Public

SK/er

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth
20' x 3-3/8	Alpha jet perf. gun.	4	6/1/84	11,866-11,886' EL
	28% HCL acid	1000 gals.	6/4/84	11,866-11,886' EL

REV. & REG. ACCTG. - PERMITS
First Production or Retest - Florida Form 9

Orig. to Mr. Steve Windham (DNR)
 xc: South Florida - Mr. R.S. Caughey(DNR)
 North Florida - Mr. C.V. Babcock(DNR)

B. W. Evans
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 D. M. Hurley
 F. W. Geisendorff
 M. T. Lee
 R. Hagans
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 Well File

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? FIRST

Permit No. 1082
A.P.I. No. 09-021-20174

Field: Raccoon Point
Operator: Exxon Corporation
Lease: Oleum Corporation
Well No.: 34-4
Type of Well (Oil or Gas): Oil
County: Collier
Section: 34 T. 51S R. 34E
B.H. Well located 1287 feet from West line
and 1451 feet from North line
Surf. 688.5' E of the W/L & 573.6' S of N/L
Sec. 2-152S, R34E
Date Completed: Continuing work on well.
Flowing or Pumping: Pumping
Production Horizon: Sunniland
Producing From: 12,218' To: 12,229'
Perforated From: 12,218' To: 12,229'
Oil String Size: 7" Seat: 12,199'
Tubing Size: 2-7/8" Bottom: 7030'
Total Depth: 12,295' MD; 11,398' TVD
Elevation: D.F. 33.8' K.B. 35.3' G.L. 11.5'
Type of Subsurface Safety Device: ---
Depth Set: ---

TEST DATA

Time Gauged or Metered: 7:30 AM - 7:30 AM 4/13/84
Opening Tank Gauge: 2 Ft. 1/4 In.
Closing Tank Gauge: 5 Ft. 3 In.
Difference: 3 Ft. 2-3/4 In.
Volume Metered: ---
Tank Co-Eff. (Bbls./In.) 5.42
Oil: 210 Bbls. Per 24 Hrs.
Salt water: 13 Bbls. Per 24 Hrs.
Oil: 210 Est. Bbls. Per Day
Choke Size: 64/64 Type: ---
If Pumping, Strokes/Min.: 6-1/2
Daily Gas Volume: --- M.C.F. ---
Gas Oil Ratio: ---
Tubing Pressure: ---
Casing Pressure: 30
Volume or Percent B.S. & W. 5.8%
Corrected Gravity: 22.9 A.P.I.: 60⁰
Amount of Oil Produced Prior Time Test Started: ---
BHSI Pressure: ---

Gauged By: Robert Ford Field Operator
(Name) (Title)

Witnessed By: -----
(Name) (Title)

AFFIDAVIT

State of Louisiana
County of Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:
Name
He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company

and the above statements are a true reflection of the records of Exxon Corporation
Company
Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 19th day of April, 19 84

djr

Audrey G. Bruce
Notary Public

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECC

Size	Chemical or Explosive Used	Quantity	Date	Depth
2-7/8"	Hyperdome II Perf. Gun	4 SPF	3/28/84	12,218-12,229'
	28% HCL Acid	750 gallons	3/29/84	12,218-12,229'

REVENUE & REGULATORY ACCTG. - PERMITS
First Production or Retest Florida Form 9

Orig. to Mr. Charles W. Hendry, Jr.

xc: South Florida

Mr. R. S. Caughey, Dept. of Natural Resources
 State of Florida, P.O. Box 4267
 North Ft. Myers, FL 33903

North Florida c - F. W. Geisendorff
 Mr. C. V. Babcock, Dept. of Natural Resources
 State of Florida, P. O. Box 306
 Jay, FL 32565

c - R. Hagans
 B. W. Evans (Pensacola)
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 Donna M. Hurley
 M. T. Lee
 Well File

4/19/84
 [Handwritten signature]

WELL COMPLETION REPORT
(FIRST PRODUCTION OR RETEST REPORT)

INSTRUCTIONS: This report is to be filed in the office of Oil and Gas Administrator within 5 days after test in order that an allowable may be assigned to the well. The allowable may be made effective not more than five days before the testing of the well and not before the well is completed. Upon receipt of report the Department will notify the operator the allowable which has been assigned to the well and its effective date. All blanks must be complete or noted NA if not applicable.

Is this a first production or retest report? RETEST Permit No. 928
A.P.I. No. 09-021-20114

Field: Raccoon Point
Operator: Exxon Corporation
Lease: Oleum Corporation
Well No.: 35-3
Type of Well (Oil or Gas): Oil
County: Collier
Section: 35 T. 51S R. 34E
Well located 1870 feet from West line
and 1320 feet from North line
Date Completed: 3/27/84
Flowing or Pumping: Pumping
Production Horizon: Sunniland
Producing From: 11,396' To: 11,410'
Perforated From: 11,396' To: 11,410'
Oil String Size: 7" Seat: 11,875'
Tubing Size: 2-7/8" Bottom: 7000'
Total Depth: 12,991'; 11,413' PBD
Elevation: D.F. --- K.B. --- G.L. ---
Type of Subsurface Safety Device: ---
Depth Set: ---

TEST DATA

Time Gauged or Metered: 7:30 AM
Opening Tank Gauge: --- Ft. --- In.
Closing Tank Gauge: --- Ft. --- In.
Difference: --- Ft. --- In.
Volume Metered: 105.9
Tank Co-Eff. (Bbls./In.) ---
Oil: 97 Bbls. Per 24 Hrs.
Salt water: 342 Bbls. Per 24 Hrs.
Oil: 97 Est. Bbls. Per Day
Choke Size: 64/64 Type: Adjustable
If Pumping, Strokes/Min.: 7-1/2
Daily Gas Volume: --- M.C.F. ---
Gas Oil Ratio: ---
Tubing Pressure: 42
Casing Pressure: 0
Volume or Percent B.S. & W. 77.9%
Corrected Gravity: 24.8 A.P.I.: 60⁰
Amount of Oil Produced Prior Time Test Started: 926
BHSI Pressure: ---

Gauged By: Robert Ford Operator
(Name) (Title)
Witnessed By: Larry Holley Field Foreman
(Name) (Title)

AFFIDAVIT

State of Louisiana
~~County of~~ Orleans Parish

Before me personally appeared Charles A. Martin who being duly sworn deposes and says:
He is the Rev. & Reg. Acctg. Superv. of Exxon Corporation
Title Company
and the above statements are a true reflection of the records of Exxon Corporation
Charles A. Martin Rev. & Reg. Acctg. Superv.
Name Title

Sworn to and subscribed before me this 30th day of March, 19 84
Audrey G. Bruce
Notary Public

djr

(Over)

Audrey G. Bruce, Notary Public
Orleans Parish, Louisiana
My commission expires at death.

CHEMICAL OR SHOOTING RECORD

Size	Chemical or Explosive Used	Quantity	Date	Depth

REVENUE & REGULATORY ACCTG. - PERMITS
First Production or Retest Florida Form 9

Orig. to Mr. Charles W. Hendry, Jr.

xc: South Florida

Mr. R. S. Caughey, Dept. of Natural Resources
 State of Florida, P.O. Box 4267
 North Ft. Myers, FL 33903

North Florida c - F. W. Geisendorff
 Mr. C. V. Babcock, Dept. of Natural Resources
 State of Florida, P. O. Box 306
 Jay, FL 32565

c - R. Hagans
 B. W. Evans (Pensacola)
 James V. Hooten, Exxon Company, U.S.A.
 P.O. Box 1076, Jackson, MS 39205
 L. E. Vollmer (BY HAND IF NGPA)
 S. Stahlman
 Donna M. Hurley
 M. T. Lee
 Well File



SOUTHERN PETROLEUM LABORATORIES, INC.

Certificate of Analysis No. 64924

Company: EXXON COMPANY, U.S.A.
Field: RACCOON POINT 33-1
Sample of: FLARE GAS
Conditions: 10 psia at 86 des.F.
Sampled by: EXXON COMPANY, U.S.A.
Submitted by: EXXON COMPANY, U.S.A.
Sample date: 03/12/85 at 2:35 am

For: EXXON COMPANY, U.S.A.

March 18, 1985

Table with 3 columns: Analysis, Mol %, GPM at 15.025 psia. Rows include Nitrogen, Carbon dioxide, Methane, Ethane, Propane, Iso-butane, N-butane, Iso-pentane, N-pentane, Hexanes, Heptanes plus, and a total row.

Specific Gravity at 60 des.F. (air=1) 1.2405

Calculated B.T.U./cu. ft. @ 15.025 psia and 60 des.F.
Dry basis 2069
Wet basis 2033

Southern Petroleum Laboratories, Inc.

Handwritten signature: Ray Calum



SOUTHERN PETROLEUM LABORATORIES, INC.

Certificate of Analysis No. 62714

Company: EXXON COMPANY, U.S.A.
 Location: 33-1
 Field: RACCOON POINT
 Sample of: OIL
 Conditions: 10 psig at 100 deg.F.
 Sampled by: DALE SAUL (SPL)
 Submitted by: SPL, INC.
 Sample date: 03/09/85 at 5:00 pm
 Remarks: SAMPLE FLASHED FROM 10 PSIG & 100 DEG. F.
 Remarks: TO 0 PSIG & 100 DEG. F.

For: EXXON COMPANY, U.S.A.

March 18, 1985

Analysis	Mol Percent	Weight Percent	Liq Vol Percent
Ethane	1.22	0.16	0.41
Propane	4.35	0.84	1.51
Iso-butane	1.22	0.31	0.50
N-butane	3.74	0.95	1.49
Iso-pentane	2.00	0.63	0.92
N-pentane	1.48	0.47	0.68
Hexanes	5.91	2.22	3.07
Heptanes	80.08	94.42	91.42
	-----	-----	-----
	100.00	100.00	100.00

Heptanes plus
 Specific gravity at 60 deg.F. (water=1) 0.9458
 Molecular weight 270.00
 Cu.ft. of vap/gal at 15.025 and 60 deg.F. 10.84
 Gallons per #mole 34.24
 Barrels per #mole 0.815

Total Sample
 Liq. specific gravity at 60 deg.F. 0.9157
 Cu.ft. of vap/gal 12.375
 Specific gravity as a vapor 10.319
 Calc. flash factor to 1 atmos. and 100 deg.F. 0.9954
 Cu.ft. of gas / barrel of stock tank liq 6.58



Analysis: 62714
Page: 2

Analysis	Flashed Gas at 1 atmos. and 100 deg.F.		Stock Tank Liquid	
	Mol Percent	GPM at 15.025 psia	Mol Percent	Liq. Vol. Percent
Ethane	33.003	9.004	0.813	0.271
Propane	43.028	12.094	3.855	1.327
Iso-butane	5.218	1.741	1.169	0.475
N-butane	12.162	3.911	3.632	1.435
Iso-pentane	2.588	0.966	1.992	0.909
N-pentane	1.501	0.555	1.480	0.674
Hexanes	2.056	0.863	5.959	3.071
Heptanes	Plus 0.444	0.410	81.100	91.838
	-----	-----	-----	-----
	100.000	29.544	100.000	100.000

Flash gas:

Specific gravity at 60 deg.F. (air=1) 1.5644
 BTU at 15.025 psia and 60 deg.F.
 Dry basis 2575.
 Wet basis 2530.

Stock Tank Liquid:

Liquid specific gravity at 60 deg.F. (water=1) 0.9177
 Cu.ft. of vap/gal 12.55
 Specific gravity as a vapor 10.431
 V/L 0.0128

Southern Petroleum Laboratories, Inc.

Ray Colais

P 408 533 648

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. R. J. Koerner	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 1/3/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.	
1. <input type="checkbox"/> Show to whom, date and address of delivery.	
2. <input type="checkbox"/> Restricted Delivery.	
3. Article Addressed to: Mr. R. J. Koerner Exxon Company, U.S.A. P. O. Box 61707 New Orleans, Louisiana 70161-17	
4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	Article Number P 408 533 648
Always obtain signature of addressee or agent and DATE DELIVERED	
5. Signature - Addressee X	
6. Signature - Agent X <i>Ray Spang</i>	
7. Date of Delivery JAN 7 1986	
8. Addressee's Address (ONLY if requested and fee paid)	

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 3, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. J. Koerner, Production Manager
Exxon Company, U.S.A. Eastern Division
P. O. Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Koerner:

Re: Permit Application No. AC 11-112866⁹

A review of your application to construct the referenced air pollution source indicates that it is incomplete. The following information is required to complete your application.

1. Section III-B. Process input rate must be substantiated.
2. Section III-C.
 - a) Complete chemical analysis for each well as to characteristics of the oil and gas produced. Analyses are to include specific determinations for compounds of sulfur.
 - b) Throughput calculations must be substantiated.
3. Section III-E. Produced fuel gas to be analyzed (op cit 2.(a) above).
4. Section V.
 - Item 1. (op cit 1. above)
 - Item 8. A complete schematic of the facility accurately labeled including all of the following: wells, heater/treaters, storage tanks, pumps, vents, stacks, flare(s), and all connecting pipework exactly as to be constructed. Labeling shall include capacities.
5. Remit permit application fee of \$1,000.

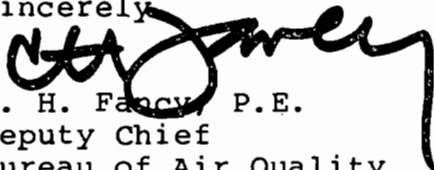
Mr. R. J. Koerner
Page Two
January 3, 1986

Upon receipt of your acceptable response to the above, processing of your application will resume. Please refer to this letter in your response.

If in your opinion any such information is proprietary, so indicate and explain. The department will maintain confidentiality pursuant to 403.11, Florida Statutes.

Should you have further questions, please call Mr. M. G. Phillips at (904)488-1344 or write to me at the above address.

Sincerely



C. H. Fancyn, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/MP/s

cc: John P. Higgins, Exxon Co.
W. L. Palmer, Exxon Co.
David Knowles, SW District

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161 1707

PRODUCTION DEPARTMENT
EASTERN DIVISION

November 22, 1985

Raccoon Point Field
Common Tank Battery
Collier County, Florida
Permit No. AO-11-95408
Modification

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

Attached, in quadruplicate, is an application for an Air Permit Modification to the oil production facility captioned above. Also included is an Exxon Co., U.S.A. check in the amount of \$1000.00 to cover the permit fee. In accordance with DER Rule 17-2-500(2)(d)3, the proposed addition represents a modification to a minor facility which is not subject to New Source Review requirements. NSR requirements are applicable only if the modification, "in and of itself, would constitute a new major facility".

CONTEMPORANEOUS EMISSIONS Δ's.

In order to produce the thirteen potential drillwells planned over the next two years, an expansion of the common tank battery is required. This expansion will include, depending on the success of the drilling program, fourteen heater treaters (including a rerun treater), thirteen pumping units, backup pipeline pump, saltwater disposal pump and generator. This application also reflects the most recent fuel gas and stock tank gas analyses in addition to the installation of vapor recovery compression.

There are presently eleven wells producing into the existing twelve treater battery. It is anticipated that an additional four wells could be ready for production before year's end. In reviewing this application, we would ask that you consider granting verbal approval for the installation of three treaters at this time such that our drilling and testing program may continue. The emissions associated with this installation will amount only to 0.4 tons/year (0.09 lb/hr). The need for additional pumping units is not anticipated at this time as two of the producing wells are flowing under their own pressure without artificial lift.

Mr. C. H. Fancy

-2-

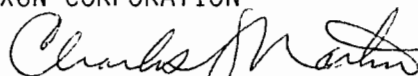
November 22, 1985

Should you need additional information, please contact Mr. W. L. Palmer at 504-561-4779. Your prompt review of our request for verbal approval for the installation of two treaters would be appreciated.

Very truly yours,

EXXON CORPORATION

By



C. A. Martin, Permits/Surveillance Supv.
Operations Accounting
Exxon Co., U.S.A.
(A division of Exxon Corporation)

WLP:bss
Attachment

xc - Mr. David Knowles, Ft. Myers, Florida

EXXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

DER

DEC 06 1985

BAQM

November 22, 1985

PRODUCTION DEPARTMENT
EASTERN DIVISION

Raccoon Point Field
Common Tank Battery
Collier County, Florida
Permit No. A0-11-95408
Modification

Mr. C. H. Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Fancy:

Attached, in quadruplicate, is an application for an Air Permit Modification to the oil production facility captioned above. Also included is an Exxon Co., U.S.A. check in the amount of \$1000.00 to cover the permit fee. In accordance with DER Rule 17-2-500(2)(d)3, the proposed addition represents a modification to a minor facility which is not subject to New Source Review requirements. NSR requirements are applicable only if the modification, "in and of itself, would constitute a new major facility".

In order to produce the thirteen potential drillwells planned over the next two years, an expansion of the common tank battery is required. This expansion will include, depending on the success of the drilling program, fourteen heater treaters (including a rerun treater), thirteen pumping units, backup pipeline pump, saltwater disposal pump and generator. This application also reflects the most recent fuel gas and stock tank gas analyses in addition to the installation of vapor recovery compression.

There are presently eleven wells producing into the existing twelve treater battery. It is anticipated that an additional four wells could be ready for production before year's end. In reviewing this application, we would ask that you consider granting verbal approval for the installation of three treaters at this time such that our drilling and testing program may continue. The emissions associated with this installation will amount only to 0.4 tons/year (0.09 lb/hr). The need for additional pumping units is not anticipated at this time as two of the producing wells are flowing under their own pressure without artificial lift.

Clarice Patty 12/10
new application -
you may get a
call on this -
Bill + district
have copies -
Please return for
file

Day 30 is
1/5/86
=====

minor mod to minor
facilities. If so,
district responsibility

Mr. C. H. Fancy

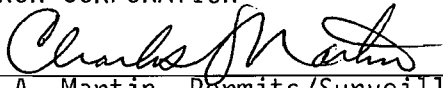
-2-

November 22, 1985

Should you need additional information, please contact Mr. W. L. Palmer at 504-561-4779. Your prompt review of our request for verbal approval for the installation of two treaters would be appreciated.

Very truly yours,

EXXON CORPORATION

By 
C. A. Martin, Permits/Surveillance Supv.
Operations Accounting
Exxon Co., U.S.A.
(A division of Exxon Corporation)

WLP:bss
Attachment

xc - Mr. David Knowles, Ft. Myers, Florida



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
APPLICATION TO OPERATE/CONSTRUCT
AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Exxon Co., U.S.A. (A Division of Exxon Corp.) COUNTY: Collier

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Raccoon Point Field pumping units, heater treaters and engines.

SOURCE LOCATION: Street Hwy 41 City Naples, Florida

UTM: East 509.6 M Meters North 2873.2M Meters

Latitude 25 ° 58 . 45 'N Longitude 80 ° 54 . 13 'W

APPLICANT NAME AND TITLE: R. J. Koerner; Production Manager

APPLICANT ADDRESS: Exxon Co., U.S.A.; Eastern Division, P. O. Box 61707, New Orleans, La. 70161-1707

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Exxon Corporation

I certify that the statements made in this application for a Modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

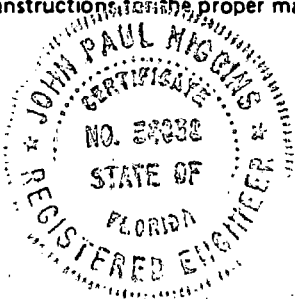
*Attach letter of authorization

Signed: R. J. Koerner
R. J. Koerner, Attorney-in-Fact
Name and Title (Please Type)

Date: 11/22/85 Telephone No. 504-561-3636

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



(Affix Seal)

Signed: John Paul Higgins
John P. Higgins
Name (Please Type)

Exxon Company, U.S.A.
Company Name (Please Type)

P. O. Box 61707, New Orleans, LA 70161-1707
Mailing Address (Please Type)

Florida Registration No. 34838

Date: 11/1/85 Telephone No. (504) 561-4494

¹See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.
- ~~Modify the existing Raccoon Point Common Tank Battery to handle an additional thirteen (13) production wells. Proposed equipment will include 13 heater treaters, 13 pumping units, a test treater and spare generator, pipeline pump and saltwater disposal pump.~~
 - ~~Vapor recovery has been installed on the storage tanks whereby, under normal operating conditions, all excess gas (VOC emissions) is compressed and burned at the existing flare stack (See Illustration I).~~
 - ~~The proposed additions will comply with all applicable State and Federal air pollution source rules and regulations.~~

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction 4th Quarter 1985 Completion of Construction 1st Quarter 1986 or as wells are drilled.

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Vapor Recovery Compression: \$90k installed; Unit was operational as of July 1, 1985.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Permit No. AC11-62020	Issued 4/19/83	Expired 1/31/85
A0-11-95408	Issued 2/8/85	Expires 2/8/90

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr _____ ; if seasonal, describe: _____

G. If this is a new source or major modification, answer the following questions. (Yes or No)

- | | |
|---|----|
| 1. Is this source in a non-attainment area for a particular pollutant? | No |
| a. If yes, has "offset" been applied? | - |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | - |
| c. If yes, list non-attainment pollutants. | |
| | |
| 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. | No |
| 3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. | No |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? | No |
| 5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? | No |

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
26 ^o API Gravity	-	-	Up to 68,269	
Crude Oil				

B. Process Rate, if applicable: (See Section V, Item 1): By computer simulation

1. Total Process Input Rate (lbs/hr): 68269 lb/hr 31^o API gravity crude (5000 BOPD)

2. Product Weight (lbs/hr): 65708 lb/hr 26^o API gravity oil, 2561 lb/hr 1.2405 SpG gas

C. Airborne Contaminants Emitted: See Exhibits I-IV.

Name of Contaminant	Emission ¹		Allowed Emission ² Rate per Ch. 17-2, F.A.C.	Allowable ³ Emission lbs/hr	Potential Emission ⁴		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC	135.2640	145.6963	N/A	33.2640	135.2640	592.4563	
NO _x	38.7004	169.5078	N/A	38.7004	38.7004	169.5078	
CO	5.0368	22.0610	N/A	5.0368	5.0368	22.0610	
SO ₂	0	0	N/A	0	0	0	
PM	0.0173	0.0755	N/A	0.0173	0.0173	0.0755	

D. Control Devices: (See Section V, Item 4) See Exhibit V.

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles ⁵ Size Collected (in microns)	Basis for Efficiency (Sec. V, It ⁵)
Hy-Bon Model HB-50	VOC	100% Conversion		
Air cooled rotary compressor w/7.5 hp		Efficiency; Assumed 80%		
Electric motor		Mechanical		
Serial No. 30923		Efficiency as		
		Downtime		

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard

⁴Emission, if source operated without control (See Section V, Item 3)

⁵If Applicable

E. Fuels : Modification only; see Exhibit VI.

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Produced Sweet (No Sulfur) Fuel Gas	0.008 MMCF/HR	0.012 MMCF/HR	25.6

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: 0 Percent Ash: 0
 Density: 0.095 lb/SCF Typical Percent Nitrogen: 0.95%
 Heat Capacity: 2033 BTU/SCF BTU/gal BTU/gal
 Other Fuel Contaminants (which may cause air pollution):

F. If applicable, indicate the percent of fuel used for space heating. Annual Average Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): See Exhibit VII.

Stack Height: ft. Stack Diameter: ft.
 Gas Flow Rate: ACFM Gas Exit Temperature: °F.
 Water Vapor Content: % Velocity: FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste
 Total Weight Incinerated (lbs/hr) Design Capacity (lbs/hr)
 Approximate Number of Hours of Operation per day days/week
 Manufacturer
 Date Constructed Model No.

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

* If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS (See Exhibit VIII)

Please provide the following supplements where required for this application.

1. Total process input rate and product weight – show derivation.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

- 9. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
 Yes No

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy) Yes No

Contaminant	Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|----------------------|
| 1. Control Device/System: | 4. Capital Costs: |
| 2. Operating Principles: | 6. Operating Costs: |
| 3. Efficiency:* | 8. Maintenance Cost: |
| 5. Useful Life: | |
| 7. Energy: | |
| 9. Emissions: | |

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

10. Stack Parameters

- | | | | |
|---------------|------|-----------------|-----|
| a. Height: | ft. | b. Diameter: | ft. |
| c. Flow Rate: | ACFM | d. Temperature: | of |
| e. Velocity: | FPS | | |

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:

- c. Efficiency*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy*:
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:

- c. Efficiency*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy**:
- h. Maintenance Costs:
- i. Availability of construction materials and process chemicals:

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

*Explain method of determining efficiency.

**Energy to be reported in units of electrical power — KWH design rate.

3.

- a. Control Device:
- b. Operating Principles:

- c. Efficiency*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- h. Maintenance Cost:

*Explain method of determining efficiency above.

- i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space and operate within proposed levels:
- 4.
- a. Control Device
 - b. Operating Principles:
 - c. Efficiency*:
 - d. Capital Cost:
 - e. Life:
 - f. Operating Cost:
 - g. Energy:
 - h. Maintenance Cost:
 - i. Availability of construction materials and process chemicals:
 - j. Applicability to manufacturing processes:
 - k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency*:
- 3. Capital Cost:
- 4. Life:
- 5. Operating Cost:
- 6. Energy:
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

- a.
 - (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:
 - (5) Environmental Manager:
 - (6) Telephone No.:

*Explain method of determining efficiency above.

(7) Emissions*:

Contaminant	Rate or Concentration

- (8) Process Rate*:
- b.
 - (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions*:

Contaminant	Rate or Concentration
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

(8) Process Rate*:

10. Reason for selection and description of systems:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

EXHIBIT I

EXXON COMPANY, U.S.A.
 EASTERN DIVISION
 RACCOON POINT COMMON TANK BATTERY NO. 1
 COLLIER COUNTY, FLORIDA

PERMIT NO. AO-11-95408
 OPERATING CONDITIONS AS OF JULY 1, 1985¹

<u>Description of Equipment</u>	<u>No. of Units Permitted</u>	<u>Maximum Theoretical Emissions (LB/Hr/Unit)</u>				
		<u>VOC</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>PM</u>
Heater Treater	12	0.0007	0.0246	0.0049	0	0.0012
Pumping Unit	12	0.4847	2.3973	0.3105	0	--
Oil Loading Pump	2	0.1115	0.5514	0.0714	0	--
Saltwater Disposal Pump	2	0.1115	0.5514	0.0714	0	--
Circulating Pump	4	0.0291	0.1438	0.0186	0	--
Oil Pipeline Pump ²	1	0.4847	2.3973	0.3105	0	--
Generator	1	0.4847	2.3973	0.3105	0	--
Storage Tanks (6-1000 bbl) ³	1	0	--	--	-	--
Truck Oil Loading ⁴	0	-	--	--	-	--

- Notes:
1. With revised (actual) fuel gas analysis
 2. Installation scheduled for 4th quarter 1985
 3. Reflects June 1985 installation of oil to storage cooler and storage tank vapor recovery compression (both electric driven)
 4. Truck oil loading terminated January 8, 1985 by order of Florida Governor and Cabinet.

EXHIBIT II

EXXON COMPANY, U.S.A.
EASTERN DIVISION
RACCOON POINT COMMON TANK BATTERY NO. 1
COLLIER COUNTY, FLORIDA

PERMIT NO. AO-11-95408
OPERATING CONDITIONS AS OF JULY 1, 1985¹

Description of Equipment	No. of Units Permitted	Maximum Theoretical Emissions (Ton/Yr)				
		VOC	NO _x	CO	SO ₂	PM
Heater Treater	12	0.0342	1.2924	0.2580	0	0.0648
Pumping Unit	12	25.4748	126.0000	16.3200	0	--
Oil Loading Pump	2	0.9765	4.8300	0.6256	0	--
Saltwater Disposal Pump	2	0.9765	4.8300	0.6256	0	--
Circulating Pump	4	0.5095	2.5200	0.3264	0	--
Oil Pipeline Pump ²	1	2.1229	10.5000	1.3600	0	--
Generator	1	2.1229	10.500	1.3600	0	--
Storage Tanks (6-1000 bbl) ³	1	0	--	--	-	--
Truck Oil Loading ⁴	0	--	--	--	-	--
	TOTAL	32.2173	160.4724	20.8756	0	0.0648
	Permit No. AO-11-95408	<u>216.1714</u>	<u>154.5264</u>	<u>20.2426</u>	<u>0.00120</u>	<u>0.0110</u>
		Δ (183.9541)	5.9460	0.6330	(0.00120)	0.0539

- Notes: 1. With revised (actual) fuel gas analysis
2. Installation scheduled for 4th quarter 1985
3. Reflects June 1985 installation of oil to storage cooler and storage tank vapor recovery compression (both electric driven)
4. Truck oil loading terminated January 8, 1985 by order of Florida Governor and Cabinet.

EXHIBIT III

EXXON COMPANY, U.S.A.
EASTERN DIVISION
RACCOON POINT COMMON TANK BATTERY NO. 1
COLLIER COUNTY, FLORIDA

MODIFICATION TO PERMIT NO. A0-11-95408
ADDITIONS ONLY

<u>Description of Equipment</u>	<u>No. of Units</u>	<u>Maximum Theoretical Emissions (Ton/Yr)</u>				
		<u>VOC</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>PM</u>
Heater Treater	14	0.0399	1.5078	0.3010	0	0.0756
Pumping Unit	13	27.5977	136.5000	17.6800	0	--
Oil Loading Pump	--	--	--	--	-	--
Saltwater Disposal Pump	1	2.1229	10.5000	1.3600	0	--
Circulating Pump	--	--	--	--	-	--
Oil Pipeline Pump	1	2.1229	10.500	1.3600	0	--
Generator	1	2.1229	10.500	1.3600	0	--
Storage Tanks (6-1000 bbl) ¹	Existing	111.6900	--	--	-	--
Truck Oil Loading	--	--	--	--	-	--
	TOTALS	145.6963	169.5078	22.0610	0	0.0756

Notes: 1. Assumptions: 5000 BOPD production rate with 20% downtime of Vapor Recovery Compression. Under normal operating conditions, tank VOC emissions will be zero.

EXHIBIT IV

EXXON COMPANY, U.S.A.
EASTERN DIVISION
RACCOON POINT COMMON TANK BATTERY NO. 1
COLLIER COUNTY, FLORIDA

MODIFICATION TO PERMIT NO. A0-11-95408
RESULTANT TOTAL FACILITY EMISSIONS

Description of Equipment	No. of Units	Maximum Theoretical Emissions (Ton/Yr)				
		VOC	NO _x	CO	SO ₂	PM
Heater Treater	26	0.0741	2.8002	0.5590	0	0.1404
Pumping Unit	25	53.0725	262.5000	34.0000	0	--
Oil Loading Pump	2	0.9765	4.8300	0.6256	0	--
Saltwater Disposal Pump	3	3.0994	15.3300	1.9856	0	--
Circulating Pump	4	0.5095	2.5200	0.3264	0	--
Oil Pipeline Pump	2	4.2153	21.0000	2.7200	0	--
Generator	2	4.2153	21.0000	2.7200	0	--
Storage Tanks (6-1000 bbl)	1	111.6900	--	--	-	--
Truck Oil Loading	0	--	--	--	-	--
	TOTALS	<u>177.8526</u>	<u>329.9802</u>	<u>42.9366</u>	<u>0</u>	<u>0.1404</u>
	Permit No. A0-11-95408	<u>216.1714</u>	<u>154.5264</u>	<u>20.2426</u>	<u>0.00120</u>	<u>0.0110</u>
	Δ	(38.3188)	175.4538	22.6940	(0.00120)	0.1294

Note: 1. Assumptions: 5000 BOPD production rate with 20% downtime of vapor recovery compression. Under normal operating conditions, tank VOC emissions will be zero.



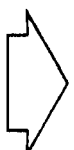
CUST. ORDER NO. PDP-2961	ORDERED BY John Higgins	DATE ORDER REC'D. 5-7-85	BRANCH BROOKHAVEN, MS	INVOICE NO. 51001869
QUOTE NO.	QUOTE DATE	QUOTE MADE BY Ike E. Case	LEASE Tank Battery #1	INVOICE DATE 6-3-85
SHIP TO Exxon Company, U.S.A. Immokalee Office Hwy 846 Immokalee, FLA 33934 AFE #60010	FIELD AND STATE Raccoon Point Field, FLA		DATE SHIPPED 5-20-85	
	COUNTY		FOB POINT Midland, TX	
SOLD TO Exxon Company, U.S.A. <i>C17969</i> P.O. Box 12344 Pensacola, FLA 32581	SHIPPED VIA Consolidated Fgt.		FREIGHT TERMS XXX PREPAID COLLECT	
	SHIPPED FROM Midland, TX		FEDERAL I.D. NO. 13-1587569	
	CITY LIMITS <input type="checkbox"/> IN SIDE <input type="checkbox"/> OUT SIDE	NATCO-CUST. CODE 277231		

TERMS: NET 30 DAYS FROM DATE OF INVOICE PAST DUE
ACCOUNTS SUBJECT TO MAXIMUM LAWFUL RATE

QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
1	<i>TM69700</i> <i>2150</i>	<p>Hy-Bon Skid Mounted, Single-Stage, STOCK TANK VAPOR RECOVERY UNIT, Model HB-50A-7.5-18B, serial #2268, designed for:</p> <p>Displacement <u>60</u> Mscfd @ 60^oF & 14.65 psia Specific Gravity <u>1.0</u>(Air =1.0) Elevation <u>S.L</u> Feet Suction Temperature <u>80^o</u> F Suction Pressure <u>14.7</u> psia Discharge Temperature <u>180^o</u> F Discharge Pressure <u>29.7</u> psia Compressor Speed <u>1095</u> rpm Maximum Discharge Pressure <u>35</u> psia(limited by installed motor hp)</p> <p>---and consisting of:</p> <p>A) One single-stage compressor package, consisting of:</p> <p>1) Compressor:</p> <p>a) Hy-Bon Model 50A air cooled, multi-vane positive displacement, rotary compressor with 2" suction and discharge connections, Assembly No. 15466, ductile iron body and rotor, steel shaft, stainless steel shaft seals and trim for sour gas service, and heavy-duty roller bearings</p> <p>2) Prime Mover:</p>	

S.O. NO. <i>1M697</i>	PAGE 1 of 6 PAGES	1s	RECEIVED BY
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(FOR PAYMENT OF INVOICES ONLY)
PLEASE REMIT TO NEAREST LOCK BOX:



C-E NATCO
P.O. BOX 910071
DALLAS, TEXAS 75391

C-E NATCO
SECURITY PACIFIC NATIONAL BANK
DEPARTMENT 1074
SCF PASADENA, CALIFORNIA 91050



C-E Natco
 Combustion Engineering, Inc.
 Post Office Box 1710
 Tulsa, Oklahoma 74101

BEST AVAILABLE COPY

INVOICE
 CONTINUATION SHEET

CUSTOMER	Exxon Company, U.S.A.	CUSTOMER ORDER NO.	PDP-2961	INVOICE NO.	51001869
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QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
		a) 7.5 hp, 1800 rpm, 460 volt, three-phase 60 HZ electric motor X-P enclosure and with 1.0 service factor b) Adjustable slide base for a 213T frame motor 3) Drive Transmission: a) Jackshaft assembly with two heavy-duty pillow block bearings b) 2B section v-belts with sheaves c) Woods Type S, size 8 compressor shaft coupling d) Fabricated steel bedplate e) Fabricated guards for v-belts B) One Hy-Bon 16" OD x 3'0" shell length x 150 psig working pressure, ASME Code constructed and stamped Vertical Suction Scrubber Model 2217. Vessel complete with: 1) Vessel Connections - ANSI Class 150 RF flanges: a) 2" vapor inlet b) 2" vapor outlet c) 1" vapor bypass return d) 2" liquid level control 2) Vessel Connections - 3000 lb. forged steel threaded couplings: a) 1" liquid drain b) 1/2" level gauge - two c) 1/4" instrument vent return 3) Vessel Accessories a) Two Murphy L1100AP explosion-proof switches for normal level control and high level shutdown, float operated with stainless steel trim	

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CUSTOMER		CUSTOMER ORDER NO.	INVOICE NO.
Exxon Company, U.S.A.		PDP-2961	51001869
QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
		b) One Penberthy Model 70A level gauge glass with safety gauge cocks c) One liquid transfer system for suction scrubber, consisting of: <ol style="list-style-type: none"> 1) Tuthill Model 2LA pump, iron construction with 1/2" NPT suction and discharge connections. 2) 1/2" NPT check valve on pump discharge for Customer field connection. 3) Lovejoy flexible shaft coupling. 4) Explosion-proof 1/2 hp, 1800 rpm, 120 volt, single-phase, 60 Hz electric motor 5) Fabricated pump and motor bedplate 6) Fabricated coupling guard 7) Pump is controlled by level controller in suction scrubber. d) One force feed lubrication system for compressor, consisting of: <ol style="list-style-type: none"> 1) One MEGA, or equal, single force feed lubricator with three point divider block distribution to compressor seals, bearings and cylinder. Lubricator is driven by compressor shaft with a positive belt drive and complete iwth: <ol style="list-style-type: none"> a) Automatic oil level controller b) Low lube oil level switch with NEMA 7 enclosure. 2) One 55 gallon drum rack mounted on skid 3) All tubing, check valves and required fittings for closed cycle operation. e) Piping Components <ol style="list-style-type: none"> 1) ANSI Class 150 RF flanges shall be provided on pipe sizes 2" and larger. Piping smaller than 2" shall utilize 300# ductile iron threaded fittings. 2) All piping will terminate on skid. Interconnecting piping to and from the assembled unit shall be furnished and installed by others. 	
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CUSTOMER Exxon Company, U.S.A.	CUSTOMER ORDER NO. PDP-2961	INVOICE NO. 51001869
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QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
		3) Piping accessories, consisting of: <ul style="list-style-type: none"> a) 2" Prince "PF" steel body check valve for compressor discharge b) 1" compressor control bypass line complete with 1" Kimray control valve and solenoid operator 130 SMT. c) Pressure gauge for final discharge, panel mounted, 2½" dial, 0-30 psi range with bronze bourdon tube and liquid filled case d) Thermometer for final discharge, 2½" dial, 50-500°F range, complete with carbon steel thermowell e) One lot carbon steel control tubing and fittings f) Electrical Components <ul style="list-style-type: none"> 1) One electrical control panel for remote mounting by Customer, NEMA 3R enclosure, complete with the following: <ul style="list-style-type: none"> a) Fused disconnect with external safety handle b) NEMA Size I across-the-line magnetic motor controller c) Control transformer, single-phase 120/460 volt, dry type, 2000 VA d) 600 volt, three-phase lightning arrestor e) Hy-Bon Model TEC-2 temperature monitor for compressor bearings and compressor discharge complete with safety shutdown at 285°F and manual reset f) Indicating lights for the following: <ul style="list-style-type: none"> 1) Power On 2) Motor overload 3) Bypass 4) High level shutdown - suction scrubber 5) High pressure shutdown-compressor bearings 6) Low pressure shutdown - compressor suction 	

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CUSTOMER Exxon Company, U.S.A.	CUSTOMER ORDER NO. PDP-2961	INVOICE NO. 51001869
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QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
		7) High temperature shutdown - compressor discharge 8) Low level - lube oil g) Eagle, or equal adjustable bypass timer, 0-30 minute range h) All electrical wiring shall be pre-wired to a common terminal strip and tested 2) One lot of panel mounted electrical controls, consisting of: 1) Asco Model SA 12B high discharge pressure shutdown control, 2-60 psi range, NEMA 7 enclosure 3) Hy-Bon Model E55 Tank Vapor Pressure Controller with explosion-proof enclosure and three sealed mercury switches for start-up and compression, bypass, and low pressure safety shutdown. Controller to be mounted on stock tank by others. Switch Set Points: Low pressure shutdown .8" H ₂ O, bypass 1.5" H ₂ O, sales cycle 2.0" H ₂ O. 4) Explosion-proof junction box with on-off selector switch mounted on skid. 5) All conduit, wiring and fittings on skid are explosion-proof in accordance with NEC 1984. 6) All conduit and fittings off skid for connection to the assembled unit shall be furnished and installed by others. h) All components, unless otherwise stated, shall be completely assembled and mounted on a structural steel skid 3' wide x 6'8" long similar to drawing No. W022256 attached. The completed unit shall be tested for proper electrical and mechanical operation prior to shipment. i) Coatings: 1) All carbon steel surfaces of vessels, piping, valves and skid to be mechanically cleaned and coated with the following:	

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QUANT.	STOCK NO.	DESCRIPTION	AMOUNT
	7090	a) Primer: One coat of zinc chromate b) Finish: One coat of grey enamel NET PRICE F.O.B. MIDLAND, TEXAS. Prepaid contract trucking charges to ship the above unit from Midland, TX to Immokalee, FLA per Consolidated Freight Lines. @ Net 5% Administrative Fee charged on Freight	14,400.00 366.88 18.34
			14,785.22
		5% FLA State Sales Tax on 14,400.00	720.00
			\$15,505.22

PENSACOLA DISTRICT
 FIELD Ransom Point
 CHARGE CTB #1
 (LEASE, WELL FACILITY, WORK BEAT, ETC.)
 USED FOR Vapor Recovery
 REPAIRS _____ NEW WORK AFE 60010
 SIGNATURE JLT

MAY 28 1985

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EXHIBIT VI

EXXON COMPANY, U.S.A.
 EASTERN DIVISION
 RACCOON POINT COMMON TANK BATTERY NO. 1
 COLLIER COUNTY, FLORIDA

GAS PHYSICAL PROPERTIES

<u>Composition</u>	<u>Fuel Gas Mol%</u>	<u>Stock Tank Gas Mol%</u>
Nitrogen	0.95	--
Carbon-Dioxide	1.52	--
Methane	39.74	--
Ethane	17.74	33.003
Propane	22.28	43.028
Iso-Butane	2.95	5.218
N-Butane	6.28	12.162
Iso-Pentane	1.88	2.588
N-Pentane	1.63	1.501
Hexanes	1.24	2.056
Heptanes plus	<u>3.79</u>	<u>0.444</u>
	100.00	100.000
Gas/Oil Ratio (SCF/BB1)	100.0	6.58
Specific Gravity	1.2405	1.5644
RHC Correction $\left(\frac{\text{TONS VOC}}{\text{TONS THC}}\right)$	0.4995	0.7810
BTU Content (BTU/CFT)	2033	2530

EXHIBIT VII

Exxon Company, U.S.A.
Raccoon Point Field
Emission Stack Geometry
and Flow Characteristics

<u>Equipment</u>	<u>Stack Diameter (Inches)</u>	<u>Stack Height (Feet)</u>	<u>Stack Exit Temperature (°F)</u>	<u>Velocity (FPS)</u>	<u>Water Vapor Content (Mol %)</u>
Heater Treater	12 in.	40 ft.	600 °F	1.8 FPS	19 %
Pumping Unit (100 hp)	3	10	1010	39.1	19
Saltwater Disposal Pump (100 hp)	3	10	1010	39.1	19
Oil Pipeline Pump (100 hp)	3	10	1010	39.1	19
Generator (100 hp)	3	10	1010	39.1	19
Storage Tanks ¹	4	18	--	--	--
Flare ²	3	15	1300	1871	19

Notes:

1. Storage tanks have been equipped with vapor recovery.
2. Flare stack calculations assume 5000 BOPD production and 224 kCFD gas flare volume.

EXHIBIT VIII

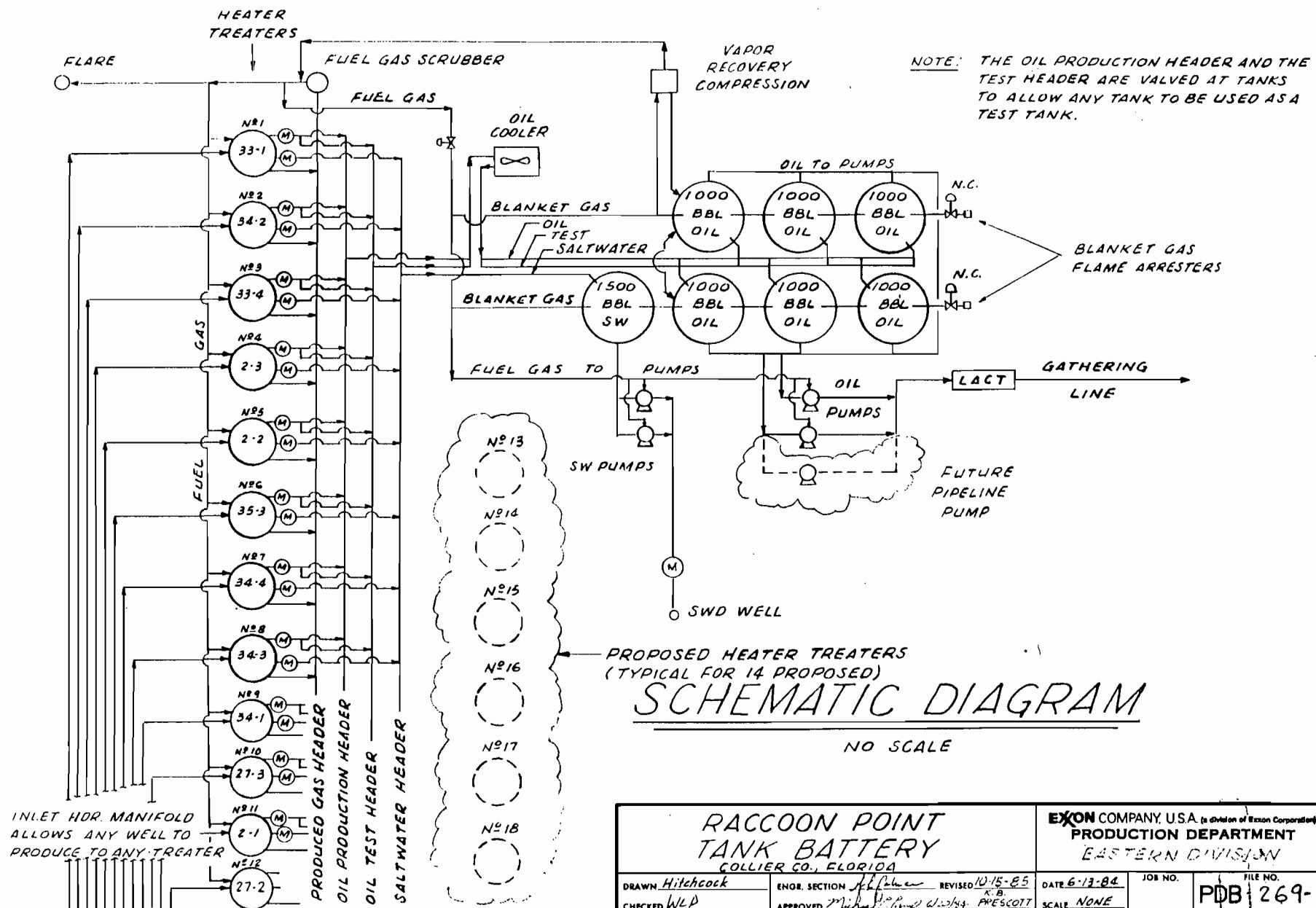
SECTION V
SUPPLEMENTAL REQUIREMENTS

1. Process input rate and product rate were determined through computer simulation.
2. Emissions estimates were made using EPA's Compilation of Air Pollutant Emission Factors (AP-42) in conjunction with the aforementioned computer simulation. VOC emissions have been virtually eliminated through the use of storage tank vapor recovery. All gas vented off the tanks is collected and burned by the previously permitted flare. Note that all emissions calculations associated with this application or Permit No. AO-11-95408 have been revised to reflect the most recent fuel gas data (Exhibit VI).

Compliance shall be tested in conformance with Specific Condition No. 1 of Permit No. AO-11-95408 (EPA Method 9 as published in 40 CFR-60 Appendix A).

3. Potential discharges were calculated using the EPA's AP-42 emission factors.
4. See Exhibit V.
5. The efficiency of the vapor recovery unit is dependent on the efficiency of the previously permitted flare which was established as 100% in Permit No. AO-11-95408. The unit is also dependent on the mechanical (run time) efficiency of the electric motor and natural gas driven generator powering the compressor. This efficiency has been very conservatively estimated at 80% to allow for maintenance and miscellaneous failures. With the installation of the requested backup generator, the mechanical efficiency should be in the range of 95-99%.
6. See Illustration I.
7. See Illustration II
8. See Illustration III and IV.

AF 11171



SCHMATIC DIAGRAM
NO SCALE

<p>RACCOON POINT TANK BATTERY COLLIER CO., FLORIDA</p>		<p>EXXON COMPANY, USA (a Division of Exxon Corporation) PRODUCTION DEPARTMENT EASTERN DIVISION</p>	
<p>DRAWN Hitchcock CHECKED WLD</p>	<p>ENGR. SECTION <i>[Signature]</i> APPROVED <i>[Signature]</i></p>	<p>REVISED 10-15-85 K.B. PRESCOTT</p>	<p>DATE 6-13-84 SCALE NONE</p>
		<p>JOB NO.</p>	<p>FILE NO. PDB 269-1</p>

PENSACOLA DISTRICT SOUTH FLORIDA - EXXON OPERATED PROPERTIES

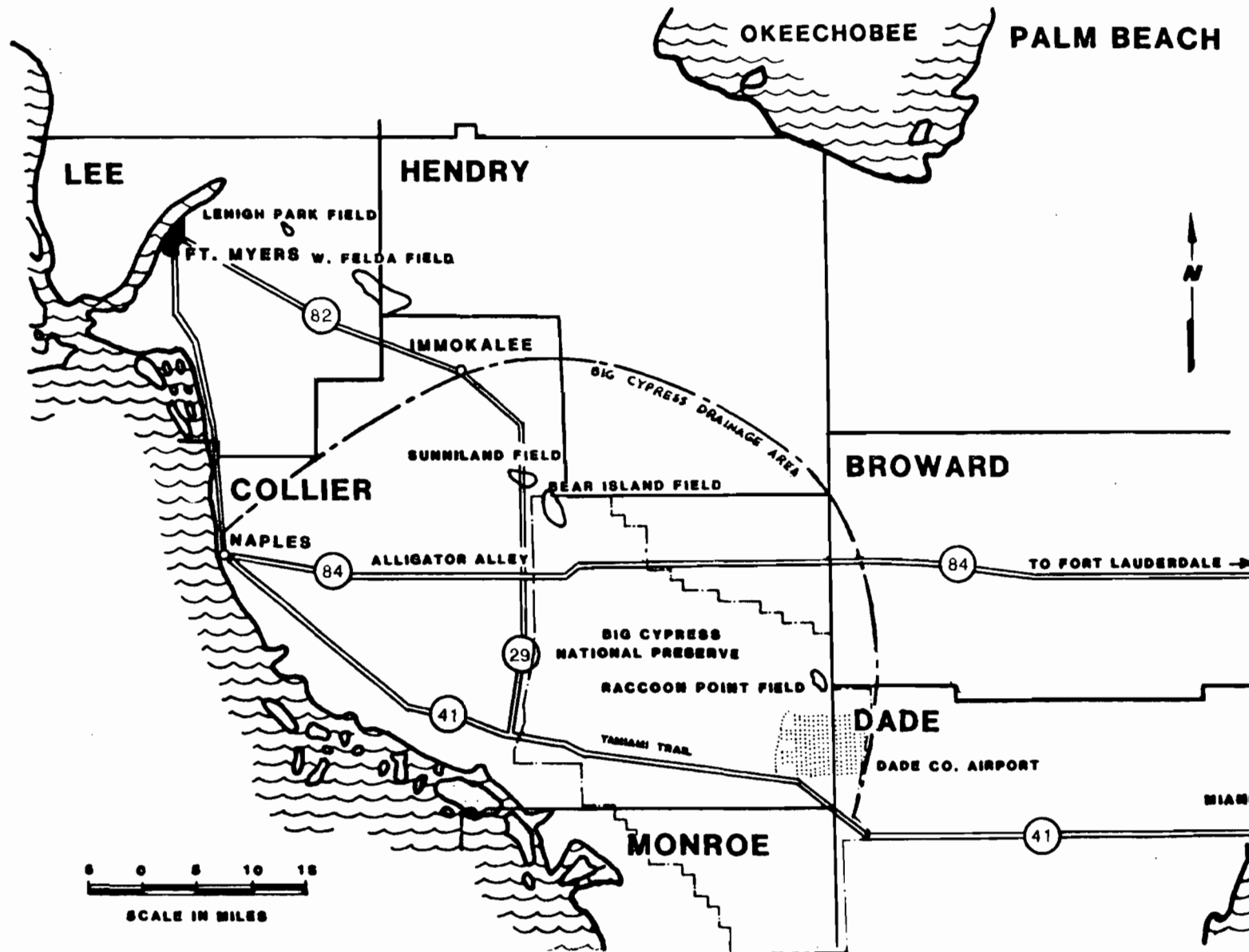
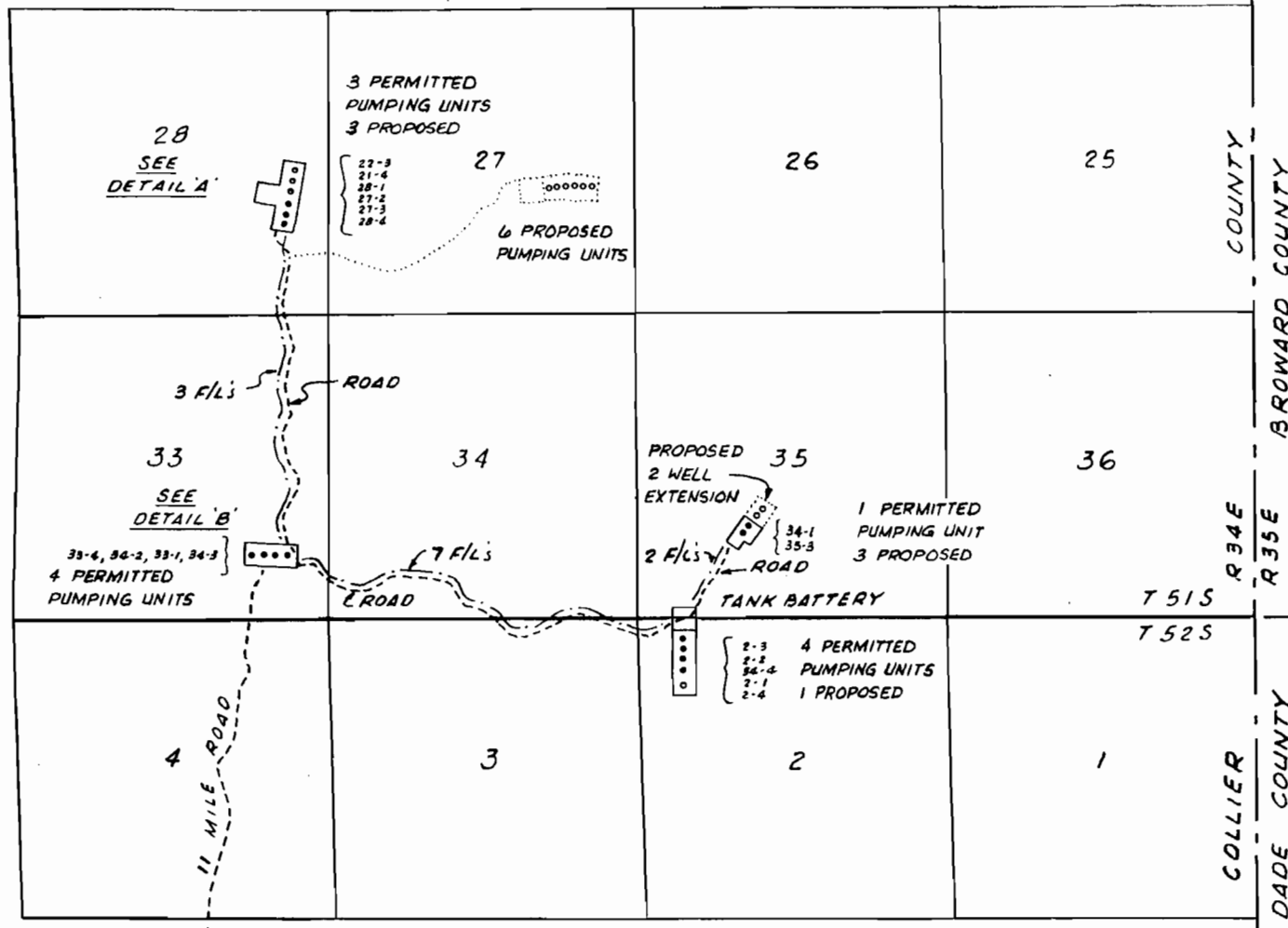
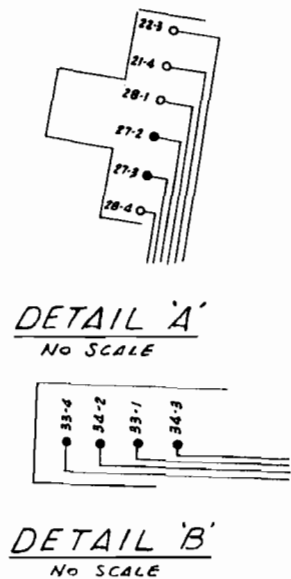


ILLUSTRATION III

AF 11171



<p>RACCOON POINT FIELD COLLIER CO., FLA.</p>		<p>EXXON COMPANY, U.S.A. (a division of Exxon Corporation)</p>		
		<p>PRODUCTION DEPARTMENT PENSACOLA DISTRICT</p>		
<p>DRAWN <i>Hitchcock</i></p>	<p>ENGR. SECTION <i>GAS III</i></p>	<p>REVISED <i>9-13-85</i></p>	<p>DATE <i>5-30-85</i></p>	<p>JOB NO.</p>
<p>CHECKED <i>[Signature]</i></p>	<p>APPROVED <i>[Signature]</i></p>	<p>DATE <i>10/22/85</i></p>	<p>SCALE <i>1"=2000'</i></p>	<p>FILE NO. PDB - 420</p>