No. 0157775

RECEIPT FOR CERTIFIED MAIL

**NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL**

(See Reverse)

SENT TO: Mr. C. A. Woolley	
STREET AND NO.	
P.O., STATE AND ZIP CODE	
POSTAGE	$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

CONSULT POSTMASTER FOR FEES

OPTIONAL SERVICES

4/21/83

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☒ Show to whom and date delivered..... ¢
   - ☐ Show to whom, date and address of delivery.... ¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
C. A. Woolley
P. O. Box 60626
New Orleans, LA 70160

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157775	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY: APR 27 1983

POSTMARK: APR 27 1983 USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

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SENDER INSTRUCTIONS

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

- Complete items 1, 2, and 3 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 TO AVOID PAYMENT OF POSTAGE, $300

DER

MAY 02 1983

BAQM

RETURN TO

Dept. of Environmental Regulation

(Name of Sender)

Bureau of Air Quality Management
2600 Blair Stone Road

(Street or P.O. Box)

Tallahassee, FL 32301
Attn: Patty Adams

(City, State, and ZIP Code)

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

April 19, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. A. Woolley, Operations Manager
Southeastern Division
Exxon Company, U.S.A.
P. O. Box 60626
New Orleans, Louisiana 70160

Dear Mr. Woolley:

Enclosed is Permit Number AC 11-62020, dated April 17, 1983, to Exxon Company U.S.A. issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

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

CHF/bjm

Enclosure

cc: John D. Johnson, Exxon Company
David Knowles, DER, South Florida District

FINAL DETERMINATION

Exxon Company's permit application for the construction of the Raccoon Point Field production facilities in Collier County, Florida has been reviewed by the Bureau of Air Quality Management. Public notice of the Department's Intent to Issue the construction permit was published in the Naples Daily News on March 4, 1983.

Copies of the preliminary determination have been available for public inspection at the Department's South Florida District Office in Fort Myers and the Bureau of Air Quality Management Office in Tallahassee.

Comments on the proposed construction permit were received from Mr. Mirza Baig, a South Florida DER's air engineer and Mr. Wallis Palmer from Exxon Company.

Mr. Baig recommended that the opacity standard of condition No. 7 be changed from 10% opacity to 5% opacity except for three-minutes period per hour of not more than 20% opacity.

Mr. Palmer requested that specific condition No. 7 be as stated in the draft permit (this is the 10% opacity standard). He also requested a change in the expiration date of the construction permit.

The Department has considered their comments and has determined that condition No. 7 will remain as stated in the draft permit since the 10% opacity standard is a reasonable limit for this type of operation. The expiration date was changed to January 31, 1985 for the final permit.

Specific Condition No. 2 was modified for clarification purposes. The allowable emissions listed in the draft permit represent lb/hr/unit for each equipment. The total allowable emissions from the 9 storage tanks are 36.0959 lb/hr.

The final action of the Department will be to issue the permit with the changes noted above.

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 60626
New Orleans, LA

Permit Number: **AC 11-62020**
Date of Issue:
Expiration Date: **January 31, 1985**
County: **Collier**
Latitude/Longitude: **25° 58' 45"N/ 80° 54' 13"W**
Project: **Raccoon Point Field gas engines, gas fired separation vessels, storage tanks and flare.**

This permit is issued under the provisions of Chapter(s) 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 drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the installation of oil production facilities to be located at Raccoon Point Field in Collier County, Florida.

The construction shall be in accordance with the attached permit application, plans and documents except as otherwise noted on pages 5 through 7, Specific Conditions.

Attachments:

Application to construct Air Pollution Sources, DER Form 17-1.122(16), received on October 29, 1982

Exxon Company's letters of December 27, 1982, and February 1, 1983 (Responses to technical discrepancies)

PERMITTEE: Exxon Company U.S.A. **I. D. Number:**
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1985

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 therefor 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.

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. **I. D. Number:**
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1985

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.

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. The new source shall be constructed in accordance with the capacities and specifications stated in the application.

PERMITTEE: Exxon Company U.S.A.

I.D. Number:
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1985

SPECIFIC CONDITIONS:

2. Emissions from this facility shall not exceed the following allowable emissions:

Equipment/Quantity	Estimated Emissions lbs/hr/unit				
	VOC	NOX	CO	SO2	PM
Heater Treater(5)	.000055	.06337	.00456	.00016	.00413
03 Heater Treater(1)	.001346	.17116	.01255	.00045	.01114
04 Pumping Unit - Gas Engine(9)	.5890	2.397	.3105	.00175	-
05 Oil Loading Pump(2)	.1358	.5502	.0707	.0004	-
06 Saltwater Disposal Pump(2)	.1358	.5502	.0707	.0004	-
07 Circulating Pump(4)	.0348	.1438	.0182	-	-
08 Oil Pipeline Pump(1)	.5883	2.397	.3105	.00175	-
09 Electric Generator Pump(1)	.2100	.8630	.1095	.0006	-
02 Storage Tanks(9) TOTAL (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
10 Truck Oil Loading	4.7	-	-	-	-
01 Flare	0	0	0	0	0

3. This facility shall be allowed to operate continuously (8736 hours per year).

4. The fuel used to fire the gas engines and heater treaters shall be natural gas and/or sweet fuel gas with no H_2S content. Analysis of the Raccoon Point Field gas will be furnished with the application for permit to operate facility.

5. Compliance with the VOC emission limits shall be maintained in a manner consistent with good air pollution practice for minimizing emissions. Proper maintenance of the storage vessels is required.

6. Compliance with the PM emission limit shall be determined by reference Method 9. If visible emissions exceed 10% opacity, EPA reference Method 5 must be used to determine the compliance status of the units.

PERMITTEE: Exxon Company U.S.A

I. D. Number:
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1985

SPECIFIC CONDITIONS:

7. Compliance with the NO_x and CO will be assumed if the visible emissions, by reference Method 9, are below 10% opacity.

8. Thirty days prior to start-up production, the South Florida District Office shall be notified so that a Department representative may verify compliance with the conditions of the construction permit.

9. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying roads and construction sites used by contractors will be taken by the applicant.

10. The applicant shall report any delays in construction and completion of this facility to the Department's South Florida District office.

11. The applicant will demonstrate compliance with the conditions of the construction permit, and submit a complete application for an operating permit to the Department's South Florida District office prior to 90 days of the expiration date of the construction permit. The applicant may continue to operate in compliance with all terms of the construction permit until its expiration date or issuance of an operating permit.

12. Upon obtaining an operating permit and thereafter, on an annual basis, the applicant will be required to submit operating and maintenance reports to the Department's South Florida District office. These reports shall include crude oil production (maximum and average production), fuel oil usage (average and maximum), percent sulfur and nitrogen in the fuel, hours of operation and emissions of the facility.

13. The source shall comply with the provisions and requirements of the attached general conditions.

Issued this 17 day of April, 1983

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Victoria J. Tschinkel

VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: _____ Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____
Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: _____ Date Due: _____

APR 18 1983

Office of the Secretary

TO: Victoria Tschinkel

FROM: Clair Fancy

DATE: April 18, 1983

SUBJ: Approval and Signature of Air Construction Permit

Attached please find one Air Construction Permit for which the applicant is Exxon Company, U.S.A. The proposed construction is for Raccoon Point Field gas engines, gas fired separation vessels, storage tanks and flare located at Raccoon Point Field, Collier County, Florida.

Day 90, after which the permit would be issued by default, is April 19, 1983.

The Bureau recommends your approval and signature.

CHF/bjm

Attachment

→P 4/20

Check Sheet

Company Name: Exxon Company, U.S.A.
Permit Number: AC 11602020
PSD Number:
County:
Permit Engineer:
Others involved:

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

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

Final Determination:
- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination
- [ ] Other

Post Permit Correspondence:
- [ ] Extensions
- [x] Amendments/Modifications
- [ ] Response from EPA
- [ ] Response from County
- [ ] Response from Park Services
- [ ] Other

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

July 30, 1984

Raccoon Point Field
Production Facilities
Permit No.: AC 11-62020

File RPTF B-2-1

Bill T.

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

The only modifications to the Raccoon Point facility foreseen at this time are described in our June 5, 1984 transmittal (copy attached).

Should you have further questions, please contact W. L. Palmer at 904-474-6606.

Sincerely,

EXXON COMPANY, U.S.A.

B W Evans.

B. W. Evans

WLP:csh
Attachment

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

June 5, 1984

Raccoon Point Field
Production Facilities
Permit No. AC-11-62024

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:

As discussed with Ms. Teresa Heron of your office, due to an updated lease opinion, provided by our legal department, it has been necessary to modify the facilities permitted for the Raccoon Point Field, Collier County, Florida. The original permit application called for commingled production of nine wells into six common heater treaters. Divided royalty interest, however, requires the use of individual treaters in order to comply with State Oil and Gas Rules. It also appears that a total of twelve wells, requiring twelve pumping units and treaters, will be needed to reach our permitted production level. The additional emissions associated with this revision are of a small magnitude as summarized on the attached table.

Presently, the permitted tank battery is handling approximately 1100 barrels of oil per day with six wells (six treaters) capable of producing into the facility. An additional two wells are to be added by June of this year. The flare is also operational and has been certified by a qualified observer of visible emissions using EPA reference Method 9 (copy attached) as having 0% opacity and therefore in compliance with the specified conditions of the permit. The present production level is well below the permitted level of 2500 BOPD as is the associated VOC emissions level.

We are presently preparing to submit an application for a permanent operating permit in which the noted modifications will be incorporated. Should you have any questions regarding this information or desire to coordinate an on-site inspection, please call W. L. Palmer at 904-474-6606.

Yours very truly,

EXXON COMPANY, U.S.A.

B. W. Evans

WLP:csh
Attachment

xc: Mr. Mirza P. Baig

FACILITY EMISSIONS AT MAXIMUM OPERATING LEVELS

FACILITY: OLEUM LEASE FIELD: RACCOON POINT

DISTRICT: PENSACOLA COUNTY: COLLIER

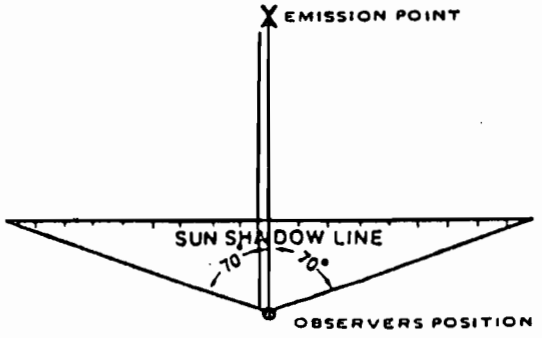
DESCRIPTION OF EQUIPMENT	ESTIMATED MAXIMUM THEORETICAL EMISSIONS TONS/YEAR				
	VOC	NOX	CO	SO_2	PM
PERMIT NO. AC 11-62020					
Heater Treater, 500 kBtu/Hr. - 5 Total	0.012	1.387	0.100	0.004	0.090
Heater Treater, 1.35 MBtu/Hr. - 1 Total	0.006	0.750	0.055	0.002	0.049
Pumping Unit, 100 HP Gas Engine - 9 Total	23.201	94.500	12.240	0.016	0.00
Total Permit	208.32	123.10	15.80	0.02	0.14
REVISION: MAY 22, 1984					
Heater Treater, 500 kBtu/Hr. - 12 Total	0.039	2.232	0.269	0.009	0.132
Heater Treater, 1.35 MBtu/Hr. - 0 Total	-	-	-	-	-
Pumping Unit, 100 HP Gas Engine - 12 Total	30.935	126.00	16.320	0.021	0.00
Total Facility	216.08	154.70	19.99	0.03	0.13

WLP:csh
5/31/84

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME: EXXON CO. U.S.A. RACCOON POINT #2 PAD
ADDRESS: IMMOKALEE OFFICE
P.O. BOX 820
CITY: IMMOKALEE | STATE: FLA. | ZIP: 33934
PHONE: 813-657-2171 | SOURCE ID NUMBER: RC11-62020
PROCESS EQUIPMENT: 1 FLARE STACK | OPERATING MODE: —
CONTROL EQUIPMENT: FLARE GAS | OPERATING MODE: —
DESCRIBE EMISSION POINT: JOINT 3 WELLS LRGO FLARE STACK
HEIGHT ABOVE GROUND LEVEL: 20' | HEIGHT RELATIVE TO OBSERVER: 14'
DISTANCE FROM OBSERVER: 300' | DIRECTION FROM OBSERVER: WEST
DESCRIBE EMISSIONS: NONE
EMISSION COLOR: SEE COMMENTS | PLUME TYPE: CONTINUOUS [X] FUGITIVE [ ] INTERMITTENT [ ]
WATER DROPLETS PRESENT: NO [X] YES [ ] | IS WATER DROPLET PLUME: ATTACHED [ ] DETACHED [ ]
AT WHAT POINT IN THE PLUME WAS OPACITY DETERMINED: 2' ABOVE FLARE STACK TIP
DESCRIBE BACKGROUND: CABBAGE PALM & PINE TREES
BACKGROUND COLOR: GREEN | SKY CONDITIONS: CLEAR
WIND SPEED: 0-5 MPH | WIND DIRECTION: SOUTH
AMBIENT TEMP.: 76°F | WET BULB TEMP.: 64°F | RELATIVE HUMIDITY: 51%

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVATION DATE: 4-18-84 | START TIME: 10:00 AM | STOP TIME: 10:30 AM

Min \ sec	0	15	30	45	Min \ sec	0	15	30	45
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR HIGHEST PERIOD: 0 | NUMBER OF READINGS ABOVE: 0 % WERE

COMMENTS: YELLOW FLAME WITH NO EMISSIONS

RANGE OF OPACITY READINGS: 0 MINIMUM 0 MAXIMUM

OBSERVER'S NAME (PRINT): Richard W. Weekley
OBSERVER'S SIGNATURE: Richard W. Weekley | DATE: 4-18-84
ORGANIZATION: EXXON CO. U.S.A.

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE: [signature] | TITLE: [illegible] | DATE:

CERTIFIED BY: DEP, Fuel Scenes | DATE: Oct 1983
VERIFIED BY: | DATE:

No. 0156546

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO Mr. B. W. Evans			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE			$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢
	OPTIONAL SERVICES	SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES			$
POSTMARK OR DATE			

8/20/84

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☒ Show to whom and date delivered..... ¢
   - ☐ Show to whom, date and address of delivery.... ¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery $

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mr. B. W. Evans
P. O. Box 12159
Pensacola, FL 32590

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0156546	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY — POSTMARK

PENSACOLA, FL DOWNTOWN STA AUG 21 1984 USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

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

August 13, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. B. W. Evans, District Manager
Exxon Company, U.S.A.
Post Office Box 12159
Pensacola, Florida 32590

Dear Mr. Evans:

Re: Modification to Air Construction Permit No. AC 11-62024
Issued on April 17, 1983

The department is in receipt of your request to modify the above referenced permit. The department has reviewed and approves your request. Specific Condition No. 2 of construction permit AC 11-62024 is revised as shown below.

Original Specific Condition No. 2

2. Emissions from this facility shall not exceed the following allowable emissions.

Equipment/Quantity	Estimated Emissions lbs/hr				
	VOC	NOX	CO	SO_2	PM
Heater Treater (5)	.000055	.06337	.00456	.00016	.00413
Heater Treater (1)	.001356	.17116	.01255	.00045	.01114
Pumping Unit - Gas Engine (9)	.5890	2.397	.3105	.00175	-
Oil Loading Pump (2)	.1358	.5502	.0707	.0004	-
Saltwater Disposal Pump (2)	.1358	.5502	.0707	.0004	-
Circulating Pump (4)	.0348	.1438	.0182	-	-
Oil Pipeline Pump (1)	.5883	2.397	.3105	.00175	-
Electric Generator Pump (1)	.2100	.8630	.1095	.0006	-
Storage Tanks (9) (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
Truck Oil Loading	4.7	-	-	-	-
Flare	ø	ø	ø	ø	ø

Revised Specific Condition No. 2

2. Emissions from this facility shall not exceed the following allowable emissions.

Equipment/Quantity	Estimated Emissions lb/hr/unit				
	VOC	NOX	CO	SO^2	PM
Heater Treater (12)	0.0008	0.04	0.01	0.00018	0.0025
Pumping Unit - Gas Eng. (12)	.5890	2.397	.3105	.00175	-
Oil Loading Pump (2)	.1358	.5502	.0707	.0004	-
Saltwater Disposal Pump (2)	.1358	.5502	.0707	.0004	-
Circulating Pump (4)	.0348	.1438	.0182	-	-
Oil Pipeline Pump (1)	.5883	2.397	.3105	.00175	-
Electric Generator Pump (1)	.2100	.8630	.1095	.0006	-
Storage Tanks (9) (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
Truck Oil Loading	4.7	-	-	-	-
Flare	Ø	Ø	Ø	Ø	Ø

This letter must be attached to construction permit No. AC 11-62020 and becomes a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/ks

cc: Mirza Baig

attachment

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices
And/Or To Other Than The Addressee

To: _____ Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____

Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: _____ Date Due: _____

RECEIVED
AUG 14
Office of the Secretary

TO: Victoria J. Tschinkel

FROM: Steve Smallwood, Bureau Chief

DATE: August 13, 1984

SUBJ: Approval and Signature of a Modification to the Air Contruction Permit, No. AC 11-62020, for Exxon Company, U.S.A., issued on April 17, 1983.

Enclosed is a modification to the referenced air construction permit and the bureau recommends approval.

CHF/TH/s

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

August 9, 1984

Raccoon Point
Oil Field Facilities
Permit #AC 11-62020

Ms. Deborah Metrin
APIS Coordinator
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Ms. Metrin:

Per your memorandum request of July 6, 1984, attached is the information needed to complete the Air Pollution Inventory System forms.

Should you have questions, please contact Richard Weekley at (904) 474-6587.

Yours very truly,

EXXON COMPANY, U.S.A.

B. W. Evans
District Manager

RWW:csh
Attachments

xc: M. C. Camp

RACCOON POINT
OIL FIELD FACILITIES

EQUIPMENT	STACK DIAMETER	HEIGHT ABOVE GROUND LEVEL	STACK TEMP. (°F)	VOLUME OF TOTAL STACK GASES (ACF/M)
• Heater Treater	12"	40'	600	177.82
• Pumping Unit	3"	10'	1010	297.08
• Oil Loading Pump	3"	6'	1070	69.57
• Saltwater Disposal Pump	3"	6'	1235	93.58
• Storage Tank Vent	4"	8'	85	2.10
• Flare	3"	18'	1300	35.3 (See Comments)
• Circulating Pump	2"	3'	1100	26.18
• Oil Pipeline Pump	3"	10'	1010	297.08 (See Comments)
• Electric Generator	3"	6'	1235	146.66 (See Comments)
• Truck Oil Loading	12"(Dome Lid)	7'	85	.2732 (See Comments)

COMMENTS:

- Flare - Based on permitted production rate of 2500 BPD. Current rate is 1100 BPD.
- Oil Pipeline Pump and Electric Generator - Data shown is estimated since equipment has not been purchased.
- Truck Oil Loading - Tanker trucks are being loaded from the bottom using a flexible loading hose to connect from the oil loading pump to the tanker. During loading, the dome lid on top of the tanker is opened.
- Truck oil loading will be discontinued upon installation of Raccoon Point Pipeline or about October 1, 1984.

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

July 30, 1984

Raccoon Point Field
Production Facilities
Permit No.: AC 11-62020

File RPTF B-2-1

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

The only modifications to the Raccoon Point facility foreseen at this time are described in our June 5, 1984 transmittal (copy attached).

Should you have further questions, please contact W. L. Palmer at 904-474-6606.

Sincerely,

EXXON COMPANY, U.S.A.

B. W. Evans

B. W. Evans

WLP:csh
Attachment

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 13, 1984

Mr. B. W. Evans, District Manager
Exxon, Production Department
P. O. Box 12159
Pensacola, Florida 32590

Dear Mr. Evans:

We acknowledge receipt of your letter dated June 5, 1984, concerning the Raccoon Point Field's production facilities.

Any modifications to a facility still under construction must be documented in the original construction permit, these conditions will be included in the operating permit if one is issued.

Please submit a written request to this office by July 30, 1984, with the changes you wish to include in the construction permit.

Should you have any questions regarding this matter please call Teresa Heron, review engineer, at (904)488-1344 or write to me at the above address.

Sincerely,

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

CHF/TH/s

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

June 5, 1984

Raccoon Point Field
Production Facilities
Permit No. AC-11-62024

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:

As discussed with Ms. Teresa Heron of your office, due to an updated lease opinion, provided by our legal department, it has been necessary to modify the facilities permitted for the Raccoon Point Field, Collier County, Florida. The original permit application called for commingled production of nine wells into six common heater treaters. Divided royalty interest, however, requires the use of individual treaters in order to comply with State Oil and Gas Rules. It also appears that a total of twelve wells, requiring twelve pumping units and treaters, will be needed to reach our permitted production level. The additional emissions associated with this revision are of a small magnitude as summarized on the attached table.

Presently, the permitted tank battery is handling approximately 1100 barrels of oil per day with six wells (six treaters) capable of producing into the facility. An additional two wells are to be added by June of this year. The flare is also operational and has been certified by a qualified observer of visible emissions using EPA reference Method 9 (copy attached) as having 0% opacity and therefore in compliance with the specified conditions of the permit. The present production level is well below the permitted level of 2500 BOPD as is the associated VOC emissions level.

We are presently preparing to submit an application for a permanent operating permit in which the noted modifications will be incorporated. Should you have any questions regarding this information or desire to coordinate an on-site inspection, please call W. L. Palmer at 904-474-6606.

Yours very truly,

EXXON COMPANY, U.S.A.

B. W. Evans

WLP:csh
Attachment

xc: Mr. Mirza P. Baig

FACILITY EMISSIONS AT MAXIMUM OPERATING LEVELS

FACILITY: OLEUM LEASE FIELD: RACCOON POINT

DISTRICT: PENSACOLA COUNTY: COLLIER

DESCRIPTION OF EQUIPMENT	ESTIMATED MAXIMUM THEORETICAL EMISSIONS TONS/YEAR				
	VOC	NOX	CO	SO_2	PM
PERMIT NO. AC 11-62020					
Heater Treater, 500 kBtu/Hr. - 5 Total	0.012	1.387	0.100	0.004	0.090
Heater Treater, 1.35 MBtu/Hr. - 1 Total	0.006	0.750	0.055	0.002	0.049
Pumping Unit, 100 HP Gas Engine - 9 Total	23.201	94.500	12.240	0.016	0.00
Total Permit	208.32	123.10	15.80	0.02	0.14
REVISION: MAY 22, 1984					
Heater Treater, 500 kBtu/Hr. - 12 Total	0.039	2.232	0.269	0.009	0.132
Heater Treater, 1.35 MBtu/Hr. - 0 Total	-	-	-	-	-
Pumping Unit, 100 HP Gas Engine - 12 Total	30.935	126.00	16.320	0.021	0.00
Total Facility	216.08	154.70	19.99	0.03	0.13

WLP:csh
5/31/84

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME: EXXON CO. U.S.A. FALCON POINT #2 PAD

ADDRESS: IMMOKALEE OFFICE

P.O. BOX 820

CITY: IMMOKALEE | STATE: FLA. | ZIP: 33934

PHONE: 813-657-2171 | SOURCE ID NUMBER: AC11-62020

PROCESS EQUIPMENT: 1 FLARE STACK | OPERATING MODE: —

CONTROL EQUIPMENT: FLARE GAS | OPERATING MODE: —

DESCRIBE EMISSION POINT: JOINT 3 UNITS LRGO FLARE STACK

HEIGHT ABOVE GROUND LEVEL: 20' | HEIGHT RELATIVE TO OBSERVER: 14'

DISTANCE FROM OBSERVER: 300' | DIRECTION FROM OBSERVER: WEST

DESCRIBE EMISSIONS: NONE

EMISSION COLOR: SEE COMMENTS | PLUME TYPE: CONTINUOUS [X] FUGITIVE [ ] INTERMITTENT [ ]

WATER DROPLETS PRESENT: NO [X] YES [ ] | IS WATER DROPLET PLUME: ATTACHED [ ] DETACHED [ ]

AT WHAT POINT IN THE PLUME WAS OPACITY DETERMINED: 2' ABOVE FLARE STACK TIP

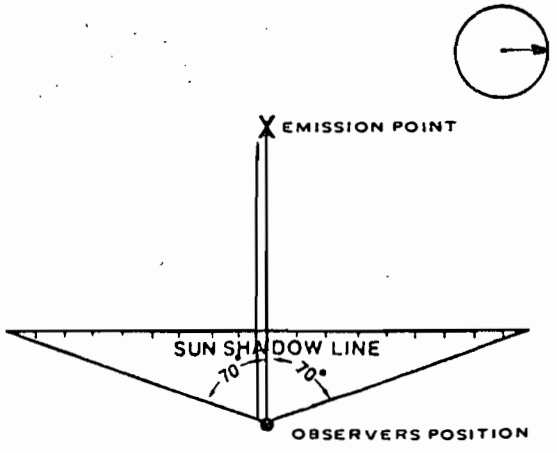
DESCRIBE BACKGROUND: CABBAGE PALM & PINE TREES

BACKGROUND COLOR: GREEN | SKY CONDITIONS: CLEAR

WIND SPEED: 0-5 MPH | WIND DIRECTION: SOUTH

AMBIENT TEMP.: 76°F | WET BULB TEMP.: 64°F | RELATIVE HUMIDITY: 51%

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVATION DATE: 4-18-84 | START TIME: 10:07 AM | STOP TIME: 10:37 AM

sec / M	0	15	30	45	sec / M	0	15	30	45
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR HIGHEST PERIOD: 0 | NUMBER OF READINGS ABOVE: 0 % WERE

RANGE OF OPACITY READINGS: 0 MINIMUM 0 MAXIMUM

COMMENTS: YELLOW FLAME WITH NO EMISSIONS

OBSERVER'S NAME (PRINT): Richard W. Weekley

OBSERVER'S SIGNATURE: Richard W. Weekley | DATE: 4-18-84

ORGANIZATION: EXXON CO. U.S.A.

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS

SIGNATURE: [signature] | TITLE: Field Supt | DATE: 5-2-84

CERTIFIED BY: DER, Judi Sears | DATE: DEC. 1983

VERIFIED BY: | DATE:

FACILITY EMISSIONS AT MAXIMUM OPERATING LEVELS

Emissions Estimates
From AC 11-62020

FACILITY: OLEUM LEASE FIELD: RACCOON POINT

DISTRICT: PENSACOLA COUNTY: COLLIER

DESCRIPTION OF EQUIPMENT	ESTIMATED MAXIMUM THEORETICAL EMISSIONS TONS/YEAR				
	VOC	NOX	CO	SO_2	PM
PERMIT NO. AC 11-62020					
Heater Treater, 500 kBtu/Hr. - 5 Total	0.012	1.387	0.100	0.004	0.090
Heater Treater, 1.35 MBtu/Hr. - 1 Total	0.006	0.750	0.055	0.002	0.049
Pumping Unit, 100 HP Gas Engine - 9 Total	23.201	94.500	12.240	0.016	0.00
Total Permit	208.32	123.10	15.80	0.02	0.14
REVISION: MAY 22, 1984					
Heater Treater, 500 kBtu/Hr. - 12 Total	0.039	2.232	0.269	0.009	0.132
Heater Treater, 1.35 MBtu/Hr. - 0 Total	-	-	-	-	-
Pumping Unit, 100 HP Gas Engine - 12 Total	30.935	126.00	16.320	0.021	0.00
Total Facility	216.08	154.70	19.99	0.03	0.13

WLP:csh
5/31/84

TABLE I
EMISSION SUMMARY
RACCOON POINT OIL FIELD

Description of Equipment in Facility	Estimated Emissions Tons/Year VOC	NOX	CO	SO2	PM
6 Heater Treaters 3.85 MMBTU/HR (total)	0.02	2.14	0.16	0.00	0.14
9 Pumping Units - 100 HP Gas Engines	23.19	94.50	12.24	0.00	NA
1 Oil Pipeline Pump 100 HP Gas Engine	2.58	10.50	1.36	0.00	NA
2 Oil Loading Pumps - 23 HP Gas Engines	1.19	4.83	0.62	0.00	NA
2 SWD Pumps - 23 HP Gas Engines	1.19	4.84	0.62	0.00	NA
4 Circ. Pumps - 7 HP Gas Engines	0.61	2.52	0.32	0.00	NA
1 Electric Generator - 36 HP Gas Engines	.92	3.78	.48	0.00	NA
3 Crude Oil Storage Tanks 1000 bbl	158.10	-	-	-	-
6 Crude Oil Storage Tanks 500 bbl	-	-	-	-	-
Truck Oil Loading	20.52	-	-	-	-
Flare 134 MCF/D	-	-	-	-	-
Total	208.32	123.10	15.8	0.00	0.14

TABLE II
ALLOWABLE EMISSIONS

Equipment/Quantity	Estimated Emissions lbs/hr				
	VOC	NOX	CO	SO2	PM
Heater Treater 6' X 27 1/2'(5)	.000055	.06337	.00456	.00016	.00413
Heater Treater 10' X 27 1/2'(1)	.001346	.17116	.01255	.00045	.01114
Pumping Unit - Gas Engine(9)	.5890	2.397	.3105	.00175	-
Oil Loading Pump(2)	.1358	.5502	.0707	.0004	-
Saltwater Disposal Pump(2)	.1358	.5502	.0707	.0004	-
Circulating Pump(4)	.0348	.1438	.0182	-	-
Oil Pipeline Pump(1)	.5883	2.397	.3105	.00175	-
Electric Generator Pump(1)	.2100	.8630	.1095	.0006	-
Storage Tanks Total(9) (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
Truck Oil Loading	4.7	-	-	-	-
Flare (1)	-	-	-	-	-

DER

MAY 23 1984

BAQM

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue permits to Chemical Lime, Inc. for the installation of dust control systems at the company's existing facility in Brooksville, Hernando County, Florida. A determination of best available control technology (BACT) was not required.

A person who is substantially affected by the department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The applications, technical evaluations and department intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
DER Southwest District
7601 Highway 301 North
Tampa, Florida 33610

Comments on this action shall be submitted in writing to Bill Thomas of Tallahassee office within thirty (30) days of this notice.

PUBLISH: May 12, 19, 1984

AFFIDAVIT OF LEGAL PUBLICATION

STATE OF FLORIDA
COUNTY OF HERNANDO

On this day personally appeared before me Raymond K. Mooney, to me well-known, who by me being first duly sworn, deposes and says that he is the General Manager of the Sun-Journal, published in the City of Brooksville, the County of Hernando, and the State of Florida; that said newspaper has been continuously published in Hernando County, Florida, at least once a week and also has been entered as second-class matter at the Post Office in the City of Brooksville, Hernando County, Florida, for a period of one year next preceding the first insertion of the attached legal notice of process; that said newspaper has been published in accordance with Chapter 14830, General Laws of Florida, and all provisions of said Statute have been complied with; that the attached legal notice of process was published in said newspaper once each week for a period of

Two week, to wit: in the

issues of said newspaper on

May 12 + 19, 1984

Raymond K. Mooney

Raymond K. Mooney, General Manager, The Sun-Journal

Sworn to and subscribed before me this 19th day of May 1984 A.D.

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES AUG 6 1986
BONDED THRU GENERAL INS. UNDERWRITERS

BY: Zanda Schlenker
Notary Public

Filed . . 19 . . , at . . O'clock . . M. and Recorded in . . Book No . . ,

Page . . . . . .

Record Verified . . . . . .

Clerk, ... Court, Hernando County, Fla.

By . . . . . D.C.

Florida Crushed Stone Company
Post Office Box 668
Brooksville, Florida 34298-0668

TAMPA, FL 336
P.M.
21 MAY
1980

Bill Thomas
DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Fl. 32301

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 · NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

October 12, 1983

Raccoon Point Field
Production Facilities
Permit No. AC 11-62020

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

DER
OCT 17 1983
BAQM

Dear Mr. Fancy:

The use of temporary production facilities was discussed by Ms. Teresa Heron and Mr. W. L. Palmer, Exxon, on July 21, 1983. We were requested to write a letter explaining the temporary production site plan.

Prior to constructing the approved facilities in December, work must be started to prepare the wells for production. We propose to work over the existing wells starting in mid-October and perform the DNR required production tests using the temporary facilities located at the Collier 35-3 well site in Section 35, T51S, R34E, Collier County, Florida. One or two wells will be produced through the existing heater treater and a new second heater treater to perform these tests and initiate well production.

The facilities to be used are: 2 heater treaters, 3 - 1000 bbl tanks, 1 - 400 bbl tank, 1 - loading pump, 1 - circulating pump, 1 - saltwater disposal pump, and 2 - well pumping units. The pumps will be operated by natural gas engines supplemented by butane for start-up.

Since this operation is temporary until approved facilities are completed later this year, the volume of oil will be limited at the test facilities. The emissions for the temporary facility without flare will not exceed the limits set by our permit for the permanent facilities based on 1300 BOPD production. The anticipated production flow rate during the test period is 665 BOPD.

If you have questions concerning this plan, or if you have any questions, please call Mr. W. L. Palmer or Mr. M. W. Bunch at the Pensacola District Office at (904) 477-8240.

Very truly yours,

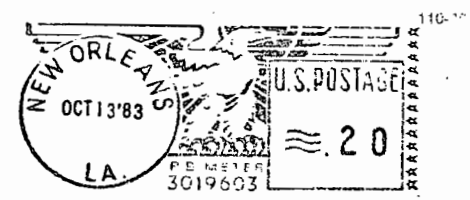
EXXON COMPANY, U.S.A.

By Charles D. Martin

M. S. Matthews, Section Head
Revenue & Regulatory Accounting
Southeastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

MWB:csh

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 • NEW ORLEANS, LOUISIANA 70160



MR C H FANCY
DEPUTY CHIEF
BUREAU OF AIR QUALITY MANAGEMENT
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32301

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 • PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

B.W. EVANS
DISTRICT MANAGER

April 15, 1983

Raccoon Point Field
Production Facilities
Permit No. AC 11-62020

Bill

DER
APR 20 1983
BAQM

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

Dear Sir:

Exxon Company, U.S.A. is in agreement with and prepared to meet all conditions specified by the proposed permit for the construction of oil production facilities at the Raccoon Point Field, Collier County, Florida. We would request the permit expiration date be extended to January 31, 1985.

In reference to Specific Condition No. 6 as applied to the proposed facility flare, we are confident of maintaining an opacity level below the 10% guideline. Under normal operating conditions the flare should be essentially smokeless. However, considering the unknown limits of Raccoon Point production, we cannot commit to any lower opacity level without extensive design work and testing. Of course, Exxon intends to operate the production facility at the lowest possible emission levels, given the available equipment and technology.

Your cooperation in expediteously processing the permit application has been greatly appreciated.

Yours very truly,

EXXON COMPANY, U.S.A.

B W Evans

B. W. Evans
District Manager

WLP:csh

xc: M. W. Bunch
M. C. Camp
D. J. Lewallen
E. M. Simmons

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

DER

MAR 21 1983

BAQM

TO: Bill Thomas

THROUGH: Philip R. Edwards PRE

FROM: Mirza Baig M.B

DATE: March 18, 1983

SUBJECT: Exxon - Raccoon Point Oil Field

A pre construction site inspection of the proposed Exxon, Raccoon Point Oil Field was conducted on March 10, 1983 along with Mark Benedict of Collier County and Doug Fry from our Punta Gorda office for their assessment of Dredge and Fill and other permit requirements. Exxon was represented by Mr. Morgan Bunch of their Pensacola office.

Currently the entrance to the 11 mile road from Tamiami Trail (U.S. 41) is blocked off and part of this road is under water. I don't forsee any air problems related with this source except their Flairing operation.

According to the applicant the Sweet fuel gas (no H_2S) will be flared and therefore should have no problem meeting 5% opacity under normal operation. I doubt at higher opacities VOC, NO_x or CO emission limitations can be met as required by draft Secific Condition No. 2. I have contacted John Zink Company to provide us with technical information on LRGO Flares.

I would recommend issuing a construction permit with Secific Condition (draft) No. 7 limiting to 5% opacity under normal operation except for up to the three minutes in any one hour at not more than 20% opacity.

MPB/mm

cc: Casey Gluckman
Bud Hendry

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 · NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

March 16, 1983

Air Permit
Raccoon Point Field
Collier County, Florida
Permit No. AC-11-62020

DER
MAR 17 1983
BAQM

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

Dear Mr. Fancy:

Enclosed for your records is a copy of the Affidavit of Publication of the Notice of Proposed Agency Action for the captioned permit that was published in the Naples Daily News in Naples, Florida on March 4, 1983. Due to the unusually long time in the mails from Naples, Florida to us, we were not able to furnish you Proof of Publication within the 7 days as requested in your letter dated February 23, 1983.

We apologize for this unavoidable delay and hope it will not delay the permitting process.

Very truly yours,

Exxon Corporation

By D. J. Lewallen

D. J. Lewallen, Section Head
Revenue & Regulatory Accounting
Southeastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

RJD/er
Attachment

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 Timothy A. O'Connor 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 Proposed Agency Action in the matter of Exxon Co. U.S.A. filed permit with Dept. Environmental Regulation Court, was published in said newspaper in the issues of March 4, 1983

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.

Sworn to and subscribed before me this 4th day of March, A.D. 19 83

Notary Public

My Commission Expires

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Exxon Company, U.S.A. to construct oil production facilities and install natural gas engines to operate pumping units on nine producing wells at Exxon Company's Raccoon Point Oil Field in Collier County, Florida. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and department intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

DER South Florida District
269 Bay Street
Ft. Myers, Florida 33901

Comments on this action shall be submitted in writing to Bill Thomas of Tallahassee office within thirty (30) days of this notice.

Mar. 4 ENP 1501

AFFIDAVIT OF PUBLICATION

NAPLES DAILY NEWS

No. 0157977

RECEIPT FOR CERTIFIED MAIL

**NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL**

(See Reverse)

SENT TO Mr. C. A. Woolley			
STREET AND NO.			
P.O., STATE AND ZIP CODE			
POSTAGE			$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢
	OPTIONAL SERVICES — SPECIAL DELIVERY		¢
	OPTIONAL SERVICES — RESTRICTED DELIVERY		¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES			$
POSTMARK OR DATE			

2/24/83

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - [X] Show to whom and date delivered..... ¢
   - [ ] Show to whom, date and address of delivery.... ¢
   - [ ] RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - [ ] RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$
   (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
   Mr. C. A. Woolley
   P. O. Box 60626
   New Orleans, LA 70160

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157977	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. DATE OF DELIVERY FEB 2 1983 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO : 1979-300-459

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 23, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. C. A. Woolley
Operations Manager, Southeastern
Division
Exxon Company, U.S.A.
Post Office Box 60626
New Orleans, Louisiana 70160

Dear Mr. Woolley:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit for the construction of oil production facilities at Exxon's Raccoon Point Oil Field in Collier County, Florida.

Before final action can be taken on your proposed permit, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Collier County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice will be grounds for denial of the permit.

The Preliminary Determination and proposed permit constitute a proposed action of the department and is subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

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

Sincerely,

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

CHF/pa

Attachment

cc: Mr. John D. Johnson, Exxon Compnay, U.S.A.
Mr. David Knowles, DER South Florida District

Technical Evaluation

and

Preliminary Determination

Exxon Company U.S.A.

Raccoon Point Oil Field

Collier County, Florida

Raccoon Point Oil Field Production Facilities

Permit Number AC 11-62020

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

February 18, 1982

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Exxon Company, U.S.A. to construct oil production facilities and install natural gas engines to operate pumping units on nine producing wells at Exxon Company's Raccoon Point Oil Field in Collier County, Florida. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and department intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

DER South Florida District
269 Bay Street
Ft. Myers, Florida 33901

Comments on this action shall be submitted in writing to Bill Thomas of Tallahassee office within thirty (30) days of this notice.

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.

I. SYNOPSIS OF APPLICATION

A. Name and Address of Applicant

Exxon Company, U.S.A.

P. O. Box 60626

New Orleans, Louisiana 70160

B. Source Location

The proposed source is located approximately 60 miles east of Naples, in Collier County, Florida. The UTM coordinates are 509.6 km East and 2873.2 km North.

C. Project Description

The applicant proposes to construct oil production facilities and to install natural gas engines to operate pumping units on nine producing wells. At the present time, 5 wells capable of commercial oil production have been drilled. One well has been drilled that will require additional well work before production is established and three wells will be drilled along with the access road when the dry season begins.

D. Process and Control Description

Extraction of oil will be accomplished by nine pumping units driven by the 100HP Waukesha gas engines. Crude oil production from the well sites will flow to a free water knockout vessel or a heater treater when required or directly to a heater treater.

The heater treater is a vessel in which the oil, water and gas are separated using heat as required to aid in the separation. The knockout vessel aids in separating oil and water, it does not have emission points.

The crude oil is piped to storage tanks for sale. Water is piped to saltwater storage tanks for disposal. Flash gas from the heater treater is collected for use in gas engines driving pumping units, loading pumps, saltwater disposal pumps, circulating pumps, generators and gas burners on heater treaters.

Controls

Emissions from the heater treaters come from the natural gas used as fuel in the burners of the heater treaters. Flash gas that is not required to operate production equipment will be burned in a smokeless flare.
Emissions from the crude oil storage tanks are vented at the tank battery through a vent line and flame arrester to the atmosphere. Emissions from the natural gas engines will be released to the atmosphere.

II. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 Florida Administrative Code. Specifically, Exxon's oil production facility is a minor emitting facility (total potential emissions <250 ton/year).

The Raccoon Point Oil Field location in Collier County, is an area currently designed as attainment in accordance with Section 17-2.420 FAC for all criteria pollutants.

The proposed source shall comply with provisions of Section 17-2.610(1). General Particulate Emission Limiting Standards and 17-2.620 General Pollutant Emission Limiting Standards.

The proposed source shall be permitted under Section 17-2.520., Sources not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

III. SOURCE IMPACT ANALYSIS

A. Emissions Limitations

The construction of the proposed project (Raccoon Point Oil Field Production Facility), will produce emissions of particulate matter (PM), nitrogen oxides (NO_X), carbon monoxide (CO) and volatile organic compounds (VOC).

Table I summarizes potential to emit all pollutants regulated under the Act which are affected by the proposed source. As the table shows, the proposed emissions are under the 250 tons per year source category.

The emission limits selected as permitted emissions, which were made a condition of the permit are listed in Table 2. The permitted emissions are in compliance with the department's applicable rules and regulations.

B. Air Quality Analysis

No ambient monitoring or modeling is required to provide reasonable assurance that ambient air standards will not be violated.

TABLE I
EMISSION SUMMARY
RACCOON POINT OIL FIELD

Description of Equipment in Facility	Estimated Emissions Tons/Year VOC	NOX	CO	SO2	PM
6 Heater Treaters 3.85 MMBTU/HR (total)	0.02	2.14	0.16	0.00	0.14
9 Pumping Units - 100 HP Gas Engines	23.19	94.50	12.24	0.00	NA
1 Oil Pipeline Pump 100 HP Gas Engine	2.58	10.50	1.36	0.00	NA
2 Oil Loading Pumps - 23 HP Gas Engines	1.19	4.83	0.62	0.00	NA
2 SWD Pumps - 23 HP Gas Engines	1.19	4.84	0.62	0.00	NA
4 Circ. Pumps - 7 HP Gas Engines	0.61	2.52	0.32	0.00	NA
1 Electric Generator - 36 HP Gas Engines	.92	3.78	.48	0.00	NA
3 Crude Oil Storage Tanks 1000 bbl	158.10	-	-	-	-
6 Crude Oil Storage Tanks 500 bbl	-	-	-	-	-
Truck Oil Loading	20.52	-	-	-	-
Flare 134 MCF/D	-	-	-	-	-
Total	208.32	123.10	15.8	0.00	0.14

TABLE II
ALLOWABLE EMISSIONS

Equipment/Quantity	Estimated Emissions lbs/hr				
	VOC	NOX	CO	SO2	PM
Heater Treater 6' X 27 1/2'(5)	.000055	.06337	.00456	.00016	.00413
Heater Treater 10' X 27 1/2'(1)	.001346	.17116	.01255	.00045	.01114
Pumping Unit - Gas Engine(9)	.5890	2.397	.3105	.00175	-
Oil Loading Pump(2)	.1358	.5502	.0707	.0004	-
Saltwater Disposal Pump(2)	.1358	.5502	.0707	.0004	-
Circulating Pump(4)	.0348	.1438	.0182	-	-
Oil Pipeline Pump(1)	.5883	2.397	.3105	.00175	-
Electric Generator Pump(1)	.2100	.8630	.1095	.0006	-
Storage Tanks Total(9) (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
Truck Oil Loading	4.7	-	-	-	-
Flare (1)	-	-	-	-	-

IV. CONCLUSION

Based on review of the data submitted by Exxon Company for the construction of the Raccoon Point Oil Field production facilities, the FDER concludes that compliance with all applicable state air quality regulations will be achieved provided certain specific conditions are met.

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 60626
New Orleans, LA

Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1984
County: Collier
Latitude/Longitude: 25° 58' 45"N/ 80° 54' 13"W
Project: Raccoon Point Field gas engines, gas fired separation vessels, storage tanks and flare.

This permit is issued under the provisions of Chapter(s) 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 drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the installation of oil production facilities to be located at Raccoon Point Field in Collier County, Florida.

The construction shall be in accordance with the attached permit application, plans and documents except as otherwise noted on pages 5 through 7, Specific Conditions.

Attachments:

Application to construct Air Pollution Sources, DER Form 17-1.122(16), received on October 29, 1982

Exxon Company's letters of December 27, 1982, and February 1, 1983 (Responses to technical discrepancies)

PERMITTEE: Exxon Company U.S.A. I. D. Number:
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1984

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 therefor 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.

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.

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.

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. The new source shall be constructed in accordance with the capacities and specifications stated in the application.

PERMITTEE: Exxon Company U.S.A.

I.D. Number:
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

2. Emissions from this facility shall not exceed the following allowable emissions:

Equipment/Quantity	Estimated Emissions lbs/hr				
	VOC	NOX	CO	SO2	PM
Heater Treater(5)	.000055	.06337	.00456	.00016	.00413
Heater Treater(1)	.001346	.17116	.01255	.00045	.01114
Pumping Unit - Gas Engine(9)	.5890	2.397	.3105	.00175	-
Oil Loading Pump(2)	.1358	.5502	.0707	.0004	-
Saltwater Disposal Pump(2)	.1358	.5502	.0707	.0004	-
Circulating Pump(4)	.0348	.1438	.0182	-	-
Oil Pipeline Pump(1)	.5883	2.397	.3105	.00175	-
Electric Generator Pump(1)	.2100	.8630	.1095	.0006	-
Storage Tanks(9) (3-1000 Bbl & 6-500 Bbl)	36.0959	-	-	-	-
Truck Oil Loading	4.7	-	-	-	-
Flare	Ø	Ø	Ø	Ø	Ø

3. This facility shall be allowed to operate continuously (8736 hours per year).

4. The fuel used to fire the gas engines and heater treaters shall be natural gas and/or sweet fuel gas with no H_2S content. Analysis of the Raccoon Point Field gas will be furnished with the application for permit to operate facility.

5. Compliance with the VOC emission limits shall be maintained in a manner consistent with good air pollution practice for minimizing emissions. Proper maintenance of the storage vessels is required.

6. Compliance with the PM emission limit shall be determined by reference Method 9. If visible emissions exceed 10% opacity, EPA reference Method 5 must be used to determine the compliance status of the units.

PERMITTEE: Exxon Company U.S.A

I. D. Number:
Permit Number: AC 11-62020
Date of Issue:
Expiration Date: January 31, 1984

SPECIFIC CONDITIONS:

7. Compliance with the NO_x and CO will be assumed if the visible emissions, by reference Method 9, are below 10% opacity.

8. Thirty days prior to start-up production, the South Florida District Office shall be notified so that a Department representative may verify compliance with the conditions of the construction permit.

9. Reasonable precautions to prevent fugitive particulate emissions during construction such as coating or spraying roads and construction sites used by contractors will be taken by the applicant.

10. The applicant shall report any delays in construction and completion of this facility to the Department's South Florida District office.

11. The applicant will demonstrate compliance with the conditions of the construction permit, and submit a complete application for an operating permit to the Department's South Florida District office prior to 90 days of the expiration date of the construction permit. The applicant may continue to operate in compliance with all terms of the construction permit until its expiration date or issuance of an operating permit.

12. Upon obtaining an operating permit and thereafter, on an annual basis, the applicant will be required to submit operating and maintenance reports to the Department's South Florida District office. These reports shall include crude oil production (maximum and average production), fuel oil usage (average and maximum), percent sulfur and nitrogen in the fuel, hours of operation and emissions of the facility.

13. The source shall comply with the provisions and requirement of the attached general conditions.

Issued this____day of_____, 19 ___

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

_____
VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

EXXON COMPANY, U.S.A.
POST OFFICE BOX 12159 · PENSACOLA, FLORIDA 32590

PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

February 1, 1983

DER - Air Permit
Production Facilities
Raccoon Point Field
Collier County, Florida
Your File: Air Construction
Permit Application AC 11-62020

Bill Teresa

State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Attention Mr. C. H. Fancy, P.E.

Gentlemen:

Per the verbal request of Ms. Teresa Heron on January 13, we are submitting a correction to our application to construct Raccoon Point Field Production Facilities.

An error was made in the Storage Tank Emissions calculations - Attachment VI, pages d and e. The Fixed Roof Tank Breathing Losses have been recalculated using the AP-42, Supplement 13 emission formula. The changes are detailed on the attached sheets. Note that the total tank vapor loss remains unchanged at 158.1 $\frac{\text{tons VOC}}{\text{Year}}$.

Since facility emissions were not affected, we are hopeful that this correction will cause little delay in processing our construction permit application. If you have any questions, please contact Mr. Phillip G. Spadone at (904) 477-8240.

Very truly yours,

EXXON COMPANY, U.S.A.

G. T. Mize
District Engineering Manager

PGS:csh
Attachments

2) Working Losses

$$\text{Turnovers/Yr} = 1710 \frac{\text{Bbl}}{\text{Day}} \times 365 \frac{\text{Day}}{\text{Yr}} \times \frac{\text{Turnover}}{2 \times 1000 \text{ Bbl}} = 312$$

Kn = 0.24, Fig. 4.3-11

$$Lw = 2.4 \times (10)^{-2} \times M \times P \times Kn \times Kc$$

$$Lw = 2.4 \times (10)^{-2} \times 32.011 \frac{\text{Lb}}{\text{Lb Mole}} \times 4.0 \text{ psia} \times 0.24 \times 0.84$$

Lw = 0.6195 Lbs/1000 Gal throughput

$$0.6195 \frac{\text{Lb}}{1000 \text{ Gal}} \times 42 \frac{\text{Gal}}{\text{Bbl}} \times \frac{\text{Ton}}{2000 \text{ Lb}} \times 1710 \frac{\text{Bbl}}{\text{Day}} \times 365 \frac{\text{Day}}{\text{Yr}} = 8.12 \frac{\text{Tons THC}}{\text{Yr}}$$

$$8.12 \frac{\text{Ton THC}}{\text{Yr}} \times 0.608 \frac{\text{Ton VOC}}{\text{Ton THC}} = 4.94 \frac{\text{Tons VOC}}{\text{Yr}}$$

3) Breathing Losses

$$L_B = 2.26 \times (10)^{-2} \times M \times \left[\frac{P}{14.7-P}\right]^{0.68} \times D^{1.73} \times H^{0.51} \times AT^{0.50} \times F_p \times C \times Kc$$

H = 12.0 ft, AT = 20°F - engineering estimate

F_p = 1.33, Table 4.3-3

C = 0.95, Fig. 4.3-10

$$L_B = 2.26 \times (10)^{-2} \times 32.011 \frac{\text{Lb}}{\text{Lb Mole}} \times \left[\frac{4.0 \text{ psig}}{(14.7-4.0) \text{ psig}}\right]^{0.68} \times (21.542 \text{ ft})^{1.73}$$

$$\times (12.0 \text{ ft})^{0.51} \times (20^{\circ}\text{F})^{0.50} \times 1.33 \times 0.95 \times 0.65 = 979.04 \frac{\text{Lbs THC}}{\text{Yr}}$$

$$979.04 \frac{\text{Lbs THC}}{\text{Yr}} \times \frac{\text{Ton}}{2000 \text{ Lb}} = 0.49 \frac{\text{Tons THC}}{\text{Yr}} \text{ per tank}$$

$$0.49 \frac{\text{Tons THC}}{\text{Yr-tank}} \times 3 \text{ tanks} \times 0.608 \frac{\text{Ton VOC}}{\text{Ton THC}} = 0.89 \frac{\text{Tons VOC}}{\text{Yr}}$$

4) Excess Flash Gas

$$108.15 - (4.94 + 0.89) = 102.32 \frac{\text{tons VOC}}{\text{Yr}}$$

Summary Tank Vapor Losses

2 - 500 Bbl tanks in Series	140 Bbl/Day	7.83 Ton VOC/Yr
2 - 500 Bbl tanks in Series	250 Bbl/Day	14.56 Ton VOC/Yr

Summary Tank Vapor Losses (Continued)

2 - 500 Bbl tanks in Series	400 $\frac{Bbl}{Day}$	23.78 $\frac{ton\ VOC}{Yr}$
3 - 1000 Bbl tanks in Series	1710 $\frac{Bbl}{Day}$	102.32 $\frac{ton\ VOC}{Yr}$
Subtotal	2500 $\frac{Bbl}{Day}$	148.49 $\frac{ton\ VOC}{Yr}$
Total Fixed Roof Working Loss		7.94 $\frac{ton\ VOC}{Yr}$
Total Tank Breathing Loss		1.67 $\frac{ton\ VOC}{Yr}$
Grand Total		158.10 $\frac{ton\ VOC}{Yr}$

Truck Loading Loss

Ref. AP-42 Pg. 4.4-5 & 4.4-6

Submerged Fill - Tank Truck

L_L = 0.037 tons/1000 bbls loaded

2500 $\frac{Bbl}{Day}$ = 20.52 $\frac{ton\ VOC}{Yr}$

Flare

Flare Gas = total produced less gas used in equipment less stock tank gas

Assume: Production GOR = 100 $\frac{SCF}{Bbl}$ Stock Tank GOR = 7 $\frac{SCF}{Bbl}$

Available Gas 2500 $\frac{Bbl}{Day}$ X (100 - 7) $\frac{SCF}{Bbl}$ = 232.5 $\frac{MCF}{Day}$

Gas Consumed at Normal Operating Level: 98.0 $\frac{MCF}{Day}$

Gas Consumed at Maximum Operating Level: 159.2 $\frac{MCF}{Day}$

Flare Gas at Normal Operating Level: (232.5 - 98.0) $\frac{MCF}{Day}$ = 134.5 $\frac{MCF}{Day}$

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 · NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

December 27, 1982

DER - Air Permit
Production Facilities
Raccoon Point Field
Collier County, Florida
Your file: Air Construction
Permit Application AC 11-62020

Bill

State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
DEC 28 1982
BAQM

Attention Mr. C. H. Fancy, P.E.

Gentlemen:

Your letter of November 23, 1982 requesting additional information needed to proceed with processing our application to construct Raccoon Point Field Production Facilities was received. (Letter attached) The information requested is submitted as follows:

1) Attachment VI Storage Tank Calculations.

The Fixed Roof Tank Breathing and Working Losses, calculated using AP-42 emissions factors as requested, are detailed on pages VI - (d and e). The revised Grand Total for Tank Vapor Loss is 158.1 $\frac{\text{ton VOC}}{\text{Year}}$. This total varies from our original permit data due to actual calculations in lieu of using tables derived from the AP-42 factors. Attachment III has been revised to reflect the new Grand Total.

2) New Attachment III-A has been prepared to show individual equipment emissions in pounds per hour.

3) Section III. H.

The Emission Stack Geometry shown in this section is for the flare stack to burn excess gas. We have included additional data for the stack based on the normal operating level. DER Form 17-1.122 (16) page 4 of 10 revised is attached.

The other emission points A through E referred to in your letter are the stacks for the heater treaters, the tank vent pipe, and gas engine exhaust pipes. This item was discussed with Ms. Teresa M. Heron on December 9, 1982 and we were advised the stack geometry for this type of equipment is not required.

To permit construction of the proposed facilities during the approaching dry season your earliest approval of this application would be appreciated. If you have any questions concerning this data, please contact Mr. Morgan W. Bunch at (904) 477-8240.

Yours very truly,

Exxon Corporation

By D. J. Lewallen

D. J. Lewallen, Section Head
Revenue & Regulatory Accounting
Southeastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

MWB/EMS/er
Attachments

No. 0157771

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO
Mr. C. A. Woolley

STREET AND NO.
P. O. Box 60626

P.O., STATE AND ZIP CODE
New Orleans, LA 70160

POSTAGE		$
CERTIFIED FEE		¢
OPTIONAL SERVICES — SPECIAL DELIVERY		¢
OPTIONAL SERVICES — RESTRICTED DELIVERY		¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$

CONSULT POSTMASTER FOR FEES

POSTMARK OR DATE

11/23/82

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - [X] Show to whom and date delivered..... ¢
   - [ ] Show to whom, date and address of delivery..... ¢
   - [ ] RESTRICTED DELIVERY
     Show to whom and date delivered..... ¢
   - [ ] RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$

   (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. C. A. Woolley
P. O. Box 60626
New Orleans, LA 70160

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0157771	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. DATE OF DELIVERY: NOV 26 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

NEW ORLEANS LA POSTMARK NOV 26 1982 USPO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459

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

November 23, 1982

CERTIFIED MAIL

Mr. C. A. Woolley
Operations Manager, Southeastern Division
Exxon, Company U. S. A.
P. O. Box 60626
New Orleans, LA 70160

Dear Mr. Woolley:

Re: Air Construction Permit Application AC 11-62020

The Bureau of Air Quality Management has received your application for a construction permit for the installation of the Raccoon Point Field Production Facilities located in Collier County, Florida. Based on our initial review of your proposal, it has been determined that additional information is needed before we can process the application. The information required to finish processing the permit application is listed below:

1. Attachment VI. Storage tank calculations.

Fixed roof tank breathing loss and Fixed roof tank working loss: It appears that AP-42 emissions factors were not used as quoted on attachment VI of the application. Please submit new calculations applying these emission factors (section 4.3, pages 1 through 12) or justify the basis of the engineering estimate as stated in the application.

2. Please submit equipment emission data in pounds per hour. You can update Table II of the pre-application correspondence that was not included with the application package.

3. Section III. H.

Emission Stack Geometry and Flow characteristic.

Do these values represent data for each stack (Emission points A through E)? If not provide the stack geometry and flow characteristics for each emission point described in the application.

As soon as the requested information is received, we will resume processing your application. If you have any questions on the data requested, please contact Teresa M. Heron at (904) 488-1344.

Sincerely,

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

TH/ks

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

November 10, 1982

Mr. C. A. Woolley
Exxon Company, U.S.A.
Post Office Box 60626
New Orleans, Louisiana 70160

Dear Mr. Woolley:

This is to acknowledge receipt of your application for a permit for the installation of the Raccoon Point Field Production Facilities. Your receipt for the processing fee is attached. The permit processing number assigned to this application is AC 11-62020.

You will be contacted in the near future if any additional information is needed to complete your application. If we may be of further assistance, please feel free to call at (904) 488-1344.

Sincerely,

Patty Adams

Patty Adams
Bureau of Air Quality
Management

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 · NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

October 26, 1982

DER - Air Permit
Production Facilities
Raccoon Point Field
Collier County, Florida

State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Attention Mr. W. A. Thomas

Dear Mr. Thomas:

Attached are completed application forms in quadruplicate for a construction permit for installation of the Raccoon Point Field Production Facilities. Also attached is Exxon's check No. 28588 in the amount of $1,000.00 to cover the permit fee.

The Raccoon Point Oil Field is being developed by Exxon Corporation in Collier County, Florida approximately 60 miles east of Naples, Florida. At the present time, 5 wells capable of commercial production and one marginal well have been drilled. Three additional wells are scheduled to be drilled when the dry season begins this year. The volume of oil to be produced when all wells are in full production was used to calculate emissions for the attached application. The new facility will be equipped with a smokeless flare to control hydrocarbon emissions.

To permit construction of the proposed facilities during the approaching dry season, your earliest review of this application would be appreciated.

Yours very truly,

Exxon Corporation

By D. J. Lewallen

D. J. Lewallen, Section Head
Revenue & Regulatory Accounting
Southeastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

MWB/DJL/er
Attachments

FORM NO. 173-00838

SETTLEMENT OF ACCOUNT

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

EXXON COMPANY, U.S.A.

A DIVISION OF EXXON CORPORATION

SOUTHEASTERN DIVISION

DESCRIPTION

State of Florida
Dept. of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32301

10-21-82 $1,000.00

Application fee for a construction permit - Raccoon Point Field Production Facilities; Raccoon Point Field, Collier County, Florida.

EXXON COMPANY, U.S.A.

A DIVISION OF EXXON CORPORATION

14-2
650

CHECK NUMBER 28588

NEW ORLEANS, LOUISIANA October 21, 1982

PAY EXXON COMPANY U.S.A. 1,000 2075 $ 1,000.00

TO THE ORDER OF STATE OF FLORIDA,
DEPT. OF ENVIRONMENTAL REGULATION

SOUTHEASTERN DIVISION

R. A. Sanders

THE FIRST NATIONAL BANK OF COMMERCE
IN NEW ORLEANS, LOUISIANA

[redacted]

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 33630

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Exxon Company, U. S. A. Date October 21, 1982

Address P. O. Box 60029, New Orleans, LA 70160 Dollars $ 1,000.00

Applicant Name & Address Same as above.

Source of Revenue

Revenue Code 5101 Application Number AC 11-62020

By Patricia G. Adams

AC 11-62020

DER

OCT 29 1982

BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [X] New[1] [ ] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Exxon Company, U.S.A.(A Div. 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 Gas Engines, gas fired separation vessels, storage tanks and flare.

SOURCE LOCATION: Street 60 miles East City Naples, Florida

UTM: East 509.6M Meters North 2873.2 M Meters

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

APPLICANT NAME AND TITLE: C. A. Woolley, Operations Manager, Southeastern Div., Exxon Co. U.S.A.

APPLICANT ADDRESS: P. O. Box 60626, New Orleans, Louisiana 70160

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 Construction 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

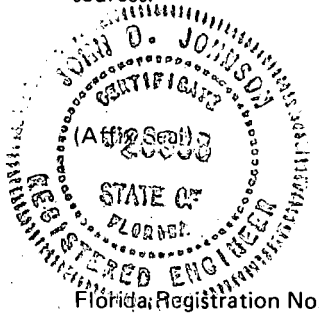
Signed: C. A. Woolley

C. A. Woolley, Attorney-in-Fact
Name and Title (Please Type)

Date: _____ 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.



Signed: John D. Johnson

John D. Johnson
Name (Please Type)

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

P. O. Box 496, Harvey, Louisiana 70059
Mailing Address (Please Type)

Florida Registration No. 26938 Date: _____ Telephone No. (504)561-4804

[1]See 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.

See Attachment I

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

Start of Construction January 1983 . Completion of Construction July 1983

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.)

Raccoon Point Production Facility will include a flare to control VOC emission.
A quoted price of the flare is $4,500 excluding installation.

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

-

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 __X__ 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? See Attachment II -
   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 Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI and VII. No (See Below)
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.

3. PSD review is not required since this is a minor facility with respect to PSD (total potential emissions < 250 T/Y).

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		

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

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted:

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	
See Attachment III							

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5]
John Zinc	VOC	Flare tip		
Smokeless Flare		100%		
Mod. LRGO				
See Attachment IV				

[1] See Section V, Item 2.

[2] Reference 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)

[3] Calculated from operating rate and applicable standard

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

[5] If Applicable

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Sweet Fuel Gas (no H_2S)	4 MCF	6.6 MCF	12.04 MMBTU/br.
for gas engines and heater treaters.			
See Attachment V for South Florida Gas Analysis. Analysis of Raccoon Point Field Gas will be furnished with application to operate facility.			

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

Fuel Analysis:

Percent Sulfur: - Percent Ash: -

Density: Sp. Gr. 1.105 ~~lbs/gal~~ Typical Percent Nitrogen: 0.68 Mol. Fr.

Heat Capacity: ~~BTU/lb~~ 1814 BTU/SCF ~~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.

Produced saltwater will be pumped to disposal well for disposal.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 10± ft. Stack Diameter: 3" ~~ft.~~

Gas Flow Rate: 50 to 250 MCF/Day Flare ~~ACFM~~ Gas Exit Temperature: - °F.

Water Vapor Content: - % Velocity: - FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (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 (^oF)
			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

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. Attachment VI
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). Burner tip 100% efficient
6. An 8½" 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. Attachment VII
7. An 8½" 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). Attachment VIII
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram. Attachments IX & X

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:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:
5. Useful Life:
6. Operating Costs:
7. Energy:
8. Maintenance Cost:
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: °F

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

(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.

SECTION VII – PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no sites _____ TSP _____ ( ) SO^2* _____ Wind spd/dir

Period of monitoring ____/____/____ to ____/____/____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

2. Instrumentation, Field and Laboratory

a) Was instrumentation EPA referenced or its equivalent? _____ Yes _____ No

b) Was instrumentation calibrated in accordance with Department procedures? _____ Yes _____ No _____ Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO^2	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description on point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

*Specify bubbler (B) or continuous (C).

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT I

The Raccoon Point Oil Field is being developed by Exxon in the eastern part of Collier County, Florida. This project is to construct production facilities and to install natural gas engines to operate pumping units on nine producing wells. At the present time, 5 wells capable of commercial oil production have been drilled. One well has been drilled that will require additional well work before production is established and three wells will be drilled when the dry season begins.

The equipment required to remove the oil from the well, separate the oil, water and gas, and to sell the oil is described in the following statement.

Beginning at the oil wells gas engines will drive the nine pumping units located at the wells sites shown on Attachment X. The 100 H.P.. Waukesha gas engines will run continuously at about 60% of the rated H.P. From the well sites the total well production will flow to a free water knockout vessel when required or directly to a heater treater. The knockout vessel aids in separating oil and water, but has no emission points. The heater treater is a vessel in which the oil, water, and gas are separated using heat as required to expedite the separation. The crude oil is flowed to storage tanks for sale. Water is flowed to saltwater storage tanks for disposal. Flash gas from the heater treaters is collected for use in gas engines driving pumping units, loading pumps, saltwater disposal pumps, circulating pumps, generator and in the burners on the heater treaters. The small volume of heater treater flash gas not required to operate production equipment will be burned in a smokeless flare. The heater treater is a fired vessel requiring 500,000 BTU/hr from produced natural gas for the 6 ft X 27½ ft vessel and 1,350,000 BTU/hr from natural gas for the 10 ft X 27½ ft vessel. To maintain the 140° F temperature needed to separate the oil and water the thermostatically controlled burner operates approximately 5 hours per day. Emissions from the heater treaters are from the natural gas used as fuel in the burner of the heater treaters. The emissions from the natural gas engines for this project are listed in the airborne contaminants emitted section of the permit.

Flash gas from the crude oil storage tanks is vented at the tank battery through a vent line and flame arrester to the atmosphere. The control of tank emissions would be difficult due to the problem associated with removing gas from low pressure tanks (2 oz. to 4 oz.). These tank emissions are shown on Attachment III.

This project as planned will be in compliance with applicable rules and regulations of the Department of Environmental Regulations to construct Air Pollution Sources as they have been interpreted to apply to the producing operation in the Raccoon Point Field.

ATTACHMENT II

Collier County is an attainment area for all regulated pollutants and there are no areas of influence for VOC, therefore non-attainment review is not required. The Raccoon Point Field and all leases held by Exxon are in Collier County.

ATTACHMENT III

FACILITY EMISSIONS AT OPERATING LEVELS

FACILITY: OLEUM LSE FIELD: RACCOON POINT
DISTRICT: PENSACOLA COUNTY: COLLIER

Description of Equipment in Facility	Estimated Emissions Tons/Year VOC	NOX	CO	SO2	PM
1) 6 Heater Treaters 3.85 MM BTU/HR (total)	0.02	2.14	0.16	0.00	0.14
2) 9 Pumping Units - 100 HP Gas Engines	23.19	94.50	12.24	0.00	NA
3) 1 Oil Pipeline Pump 100 HP Gas Engine	2.60	10.50	1.36	0.00	NA
4) 2 Oil Loading Pumps - 23 HP Gas Engines	1.19	4.83	0.62	0.00	NA
5) 2 SWD Pumps - 23 HP Gas Engines	1.19	4.83	0.62	0.00	NA
6) 4 Circ. Pumps - 7 HP Gas Engines	0.61	2.52	0.32	0.00	NA
7) 1 Electric Generator - 36 HP Gas Engines	.98	3.78	.48	0.00	NA
8) 3 Crude Oil Storage Tanks 1000 bbl (H)	170.13	-	-	-	-
9) 6 Crude Oil Storage Tanks 500 bbl (H)	-	-	-	-	-
10) Truck Oil Loading	20.52	-	-	-	-
11) Flare 134 MCF/D					
Total	220.43	123.10	15.8	0.00	0.14

ATTACHMENT IV

The application of the John Zinc Smokeless Flare Model LRGO will comply with 20% opacity required by the regulations. The planned flare is small and will not require steam injection to control opacity. Since experience with smokeless flares at oil and gas tank batteries is limited and gas to be burned in the Raccoon Point Field will probably have a relative high molecular weight, a definative lower opacity limit is not practical to estimate at this time. When actual gas analysis from the field is available and more experience with smokeless flares at oil and gas production facilites is obtained lower limits may be possible.

ATTACHMENT V

TYPICAL SO. FLORIDA GAS

GAS ANALYSIS MOL. FR. %	MOL. WT. #/# MOL.	PRODUCTION OF MOL. FR. & MOL. WT.
CO_2 1.74	44.01	0.766
N_2 0.68	28.02	0.191
C_1 42.39 METHANE	16.04	6.799
C_2 17.83 ETHANE	30.07	5.361
C_3 24.09 PROPANE	44.09	10.621
C_4 2.69	58.12	1.563
C_4 6.58	58.12	3.824
C_5 4.00	72.15	2.886
100%		32.011

37.36

THC

VOC

$$\frac{32.011}{28.97} = 1.105 \text{ Gas Gravity}$$

THC Gas Gravity =

$$\frac{32.011 - (0.766+0.191)}{28.97} = \frac{31.054}{28.97} = 1.072$$

$$\frac{\text{tons VOC}}{\text{tons THC}} = \frac{10.621+1.563+3.824+2.886}{31.054} = 0.608$$

AIR	MOL WT	FRACTIONAL CONT
N_2 (78% By V)	28.01	21.85
O_2 (21%	32.00	6.72
Ar (1%	39.95	4.00
		MW_{air} = 32.57

ATTACHMENT VI

CALCULATIONS

EMISSION FACTOR REFERENCES

Fired Vessels (Heater Treaters)	AP-42 p 1.4-2 Table 1.4-1 Values for Industrial Process Boiler
Natural Gas Fired Engines	AP-42 p. 3.3.2-2 Table 3.3.2-1
Tank Emissions	AP-42 Section 4.3 pp. 4.3-1, 12
Flash Gas	Engineering Estimate
Vents	Engineering Estimates
Flare	Estimate by Manufacturer

Heater Treater - Emissions Factor from Table 1.4-1

Equipment

5 - 6' X 27-1/2' Heater Treater

500,000 BTU/hr Burner (Max.)

1 - 10' X 27-1/2' Heater Treater

1,350,000 BTU/hr Burner (Max.)

Particulates (typical calculation)

$$\frac{\text{Tons}}{\text{Yr}} = \frac{15 \text{ lb.}}{10^6 \text{ ft}^3} \times \frac{500{,}000 \text{ BTU/hr.}}{1814 \text{ BTU/SCF}} \times \frac{24 \text{ hr}}{\text{day}} \times \frac{365 \text{ day}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb.}} = 0.01819 \text{ per unit}$$

Summary:

Particulates

6' X 27-1/2' H.T.	- 5 X 0.0181	=	0.0905
10' X 27-1/2' H.T.	- 1 X 0.0488	=	0.0488
	Total	=	0.1393

SO_2

6' X 27-1/2' H.T.	- 5 X .0007	=	0.0035
10' X 27-1/2' H.T.	- 1 X .0020	=	0.0020
	Total	=	0.0055

.0036

CO

6' X 27-1/2' H.T.	- 5 X 0.20	=	0.100
	1 X 0.055	=	0.055
	Total	=	0.155

VOC

6' X 27-1/2' H.T.	- 5 X 0.004 X .608 $\frac{\text{ton VOC}}{\text{ton THC}}$	=	0.012
10' X 27-1/2' H.T.	- 1 X 0.010 X .608 $\frac{\text{ton VOC}}{\text{ton THC}}$	=	0.006
	Total		0.018

NO_X

6' X 27-1/2' H.T.	- 5 X 0.2276	=	1.388
10' X 27-1/2' H.T.	- 1 X 0.750	=	.750
			2.138

- Gas Engines Emissions -

Emission Factors from Table 3.3.2-1 Converted to Tons per year per H.P.

Typical Calculation -

9 - 100 HP Gas Engines on Pumping Units

NO_x 900 HP X 0.105 = 94.5 $\frac{\text{tons}}{\text{yr}}$

CO 900 HP X 0.0136 = 12.24 $\frac{\text{tons}}{\text{yr}}$

VOC 900 HP X 0.0424 X 0.608 $\frac{\text{tons VOC}}{\text{tons THC}}$ = 23.19 $\frac{\text{ton}}{\text{yr}}$

SO_2 900 HP X 0.0000175 = 0.015 $\frac{\text{ton}}{\text{yr}}$

- Summary Other Gas Engines -

	VOC	NO_x	CO	SO_2	PM
1 - 100 HP Oil Loading	2.58	10.50	1.36	-	-
2 - 23 HP Oil Truck Loading	1.19	4.83	0.62	-	-
2 - 23 HP SWD Pumps	1.19	4.83	0.62	-	-
4 - 6 HP Circulating Pumps	0.61	2.52	0.32	-	-
1 - 36 H.P. Electric Generator	0.92	3.78	0.48	-	-

- Tank Vapor Loss -

Install 3 - 1000 Bbl Tanks in Series

Production 1710 Bbls. of 25° API gravity Oil

Upstream H.T. Pressure 20 psig

At 10 psig Stock Tank GOR is 7 $\frac{\text{cu. ft.}}{\text{bbl.}}$

Typical Calculation

1) Flash Gas

1710 $\frac{\text{Bbl}}{\text{Day}}$ X 365 $\frac{\text{Days}}{\text{Yr}}$ X 7 $\frac{\text{SCF}}{\text{Bbl}}$ X 1.07 Sp. Gr. X $\frac{28.97\ \#}{\#\ \text{MOL}}$ X $\frac{1\#\ \text{MOL}}{380.68\ \text{SCF}}$

X $\frac{\text{ton}}{2000\ \#}$ = 177.88 tons $\frac{\text{THC}}{\text{Yr}}$

177.88 $\frac{\text{ton THC}}{\text{Yr}}$ X 0.608 $\frac{\text{tons VOC}}{\text{tons THC}}$ = 108.15 $\frac{\text{tons VOC}}{\text{Yr}}$

2) Working Losses

Turnovers

$$1710 \frac{\text{Bbl}}{\text{Day}} \times 365 \frac{\text{Day}}{\text{Yr}} \times \frac{\text{Turnover}}{2 \times 1000 \text{ Bbl}} = 312$$

Kn = 0.24 Fig. 4.3-11

$$\frac{1710}{1500} \times 23.0 \frac{\text{ton}}{\text{Yr}} \times 0.24 = 6.29 \text{ ton } \frac{\text{THC}}{\text{Yr}}$$

$$6.29 \text{ ton } \frac{\text{THC}}{\text{Yr}} \times 0.608 \frac{\text{tons VOC}}{\text{tons THC}} = 3.83 \frac{\text{tons VOC}}{\text{Yr}}$$

3) Breathing Losses

$$3.6 + 3.6 + 3.6 = 10.8 \frac{\text{tons THC}}{\text{Yr}}$$

$$10.8 \frac{\text{tons THC}}{\text{Yr}} \times .608 \frac{\text{tons VOC}}{\text{tons THC}} = 6.57 \frac{\text{tons VOC}}{\text{Yr}}$$

4) Excess Flash Gas

$$108.15 - (3.83 + 6.5) = 97.82 \frac{\text{tons VOC}}{\text{Yr}}$$

Summary Tank Vapor Losses Other Tanks

2 - 500 Bbl tanks in Series	140 Bbl/Day	6.25 ton VOC/Yr
2 - 500 Bbl tanks in Series	250 Bbl/Day	13.1 ton VOC/Yr
2 - 500 Bbl tanks in Series	400 Bbl/Day	22.39 ton VOC/Yr
3 - 1000 Bbl tanks in Series	1710 Bbl/Day	97.82 ton VOC/Yr
	2500 Bbl/Day	139.56 ton VOC/Yr.
Total Fixed Roof Working Loss		23.28 ton VOC/Yr.
Total Tank Breathing Loss		7.29 ton VOC/Yr.
	Grand Total	170.13 ton VOC/Yr.

- Truck Loading Loss -

Ref. AP-42 pg. 4.4-5 & 4.4-6

Submerged Fill - Tank Truck

L_L = 0.037 tons/1000 bbls loaded

2500 $\frac{Bbl}{Day}$ = 20.52 $\frac{ton\ VOC}{Yr}$

Flare

Flare gas = Total Produced less gas used in equipment less stock tank gas

Assume GOR 100 $\frac{SCF}{Bbl}$

Stock Tank GOR 7 $\frac{SCF}{Bbl}$

Available Gas

2500 $\frac{Bbl}{Day}$ X 93 $\frac{SCF}{Bbl}$ = 232.5 $\frac{MCF}{Day}$

M = THOUSAND
MM = MILLION

Gas Consumed at Normal

Operating Level 98.0 $\frac{MCF}{Day}$

Gas Consumed at Maximum

Operating Level - 159.2 $\frac{MCF}{Day}$ (OLD)

= 58,108 $\frac{KCF}{YR}$

Flare = 232.5 $\frac{MCF}{Day}$ - 98.0 $\frac{MCF}{Day}$ = 134.5 $\frac{MCF}{Day}$

(NEW) 13.27 $\frac{KCF/UNIT\ (12)}{DAY}$ x 14 UNITS x $\frac{365\ days}{yr.}$

= 67,810 $\frac{KCF}{YR}$

NEW+OLD = 58,108 + 67,810 (KCF)

100 CFM
90

OVERALL PRODUCTION THC

$\frac{7,500\ Bbl}{day} \times \frac{93\ SCF}{Bbl} \times \frac{365\ days}{yr} = 254,589\ \frac{KCF\ THC}{YR} = 254,589,000\ \frac{SCF}{YR}$

254,589 SCF[THC] x (1.07 sp. gr. [THC$_{sg}$]) $\left(\frac{28.97\#}{380.68\ SCF}\right) \times \left(\frac{1\ TON}{2,000\#}\right)$ [4.071 · 10^{-5} $\frac{TONS\ THC}{SCF}$] = 10.365 KTPY THC

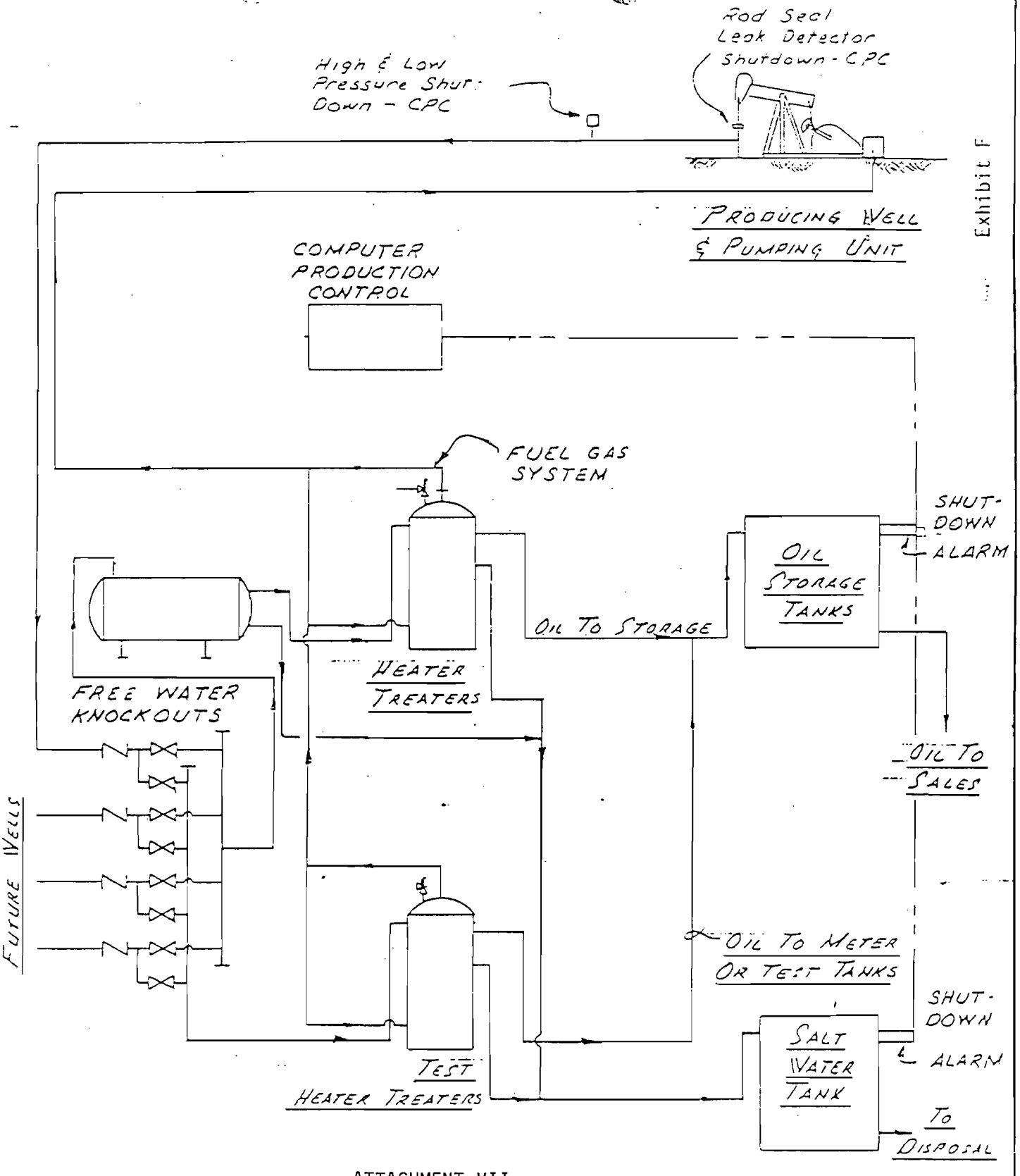
MAX. PROD FLARED

254,587 KCF THC − (67,810 KCF) (CONSUMED NEW) + (58,108 KCF) (CONSUMED OLD) = 129,371 $\frac{KCF\ THC}{YR}$

129,371 SCF (4.071 · 10^{-5} $\frac{TONS\ THC}{SCF}$) = 5.27 KTPY THC

5.27 KTPY x $\left(\frac{VOC}{THC}\right)^{.608}$ = 3.20 KTPY VOC VI - (e)

3.20 KTPY (FLARE E = 95%) = 160 TPY VOC



ATTACHMENT VII

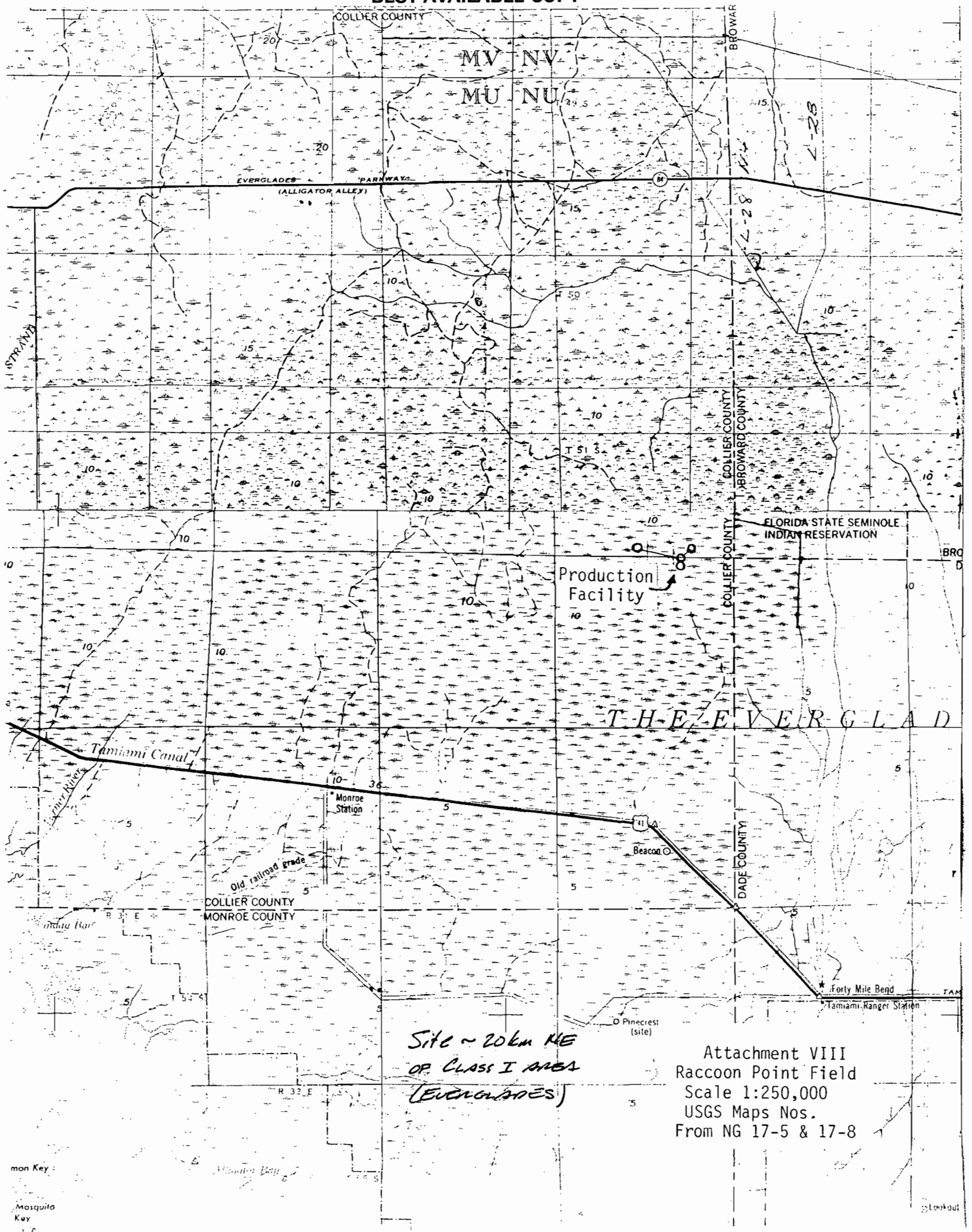
SCHEMATIC LAYOUT
PRODUCTION FACILITIES
RACCOON POINT FIELD, COLLIER COUNTY, FLA.

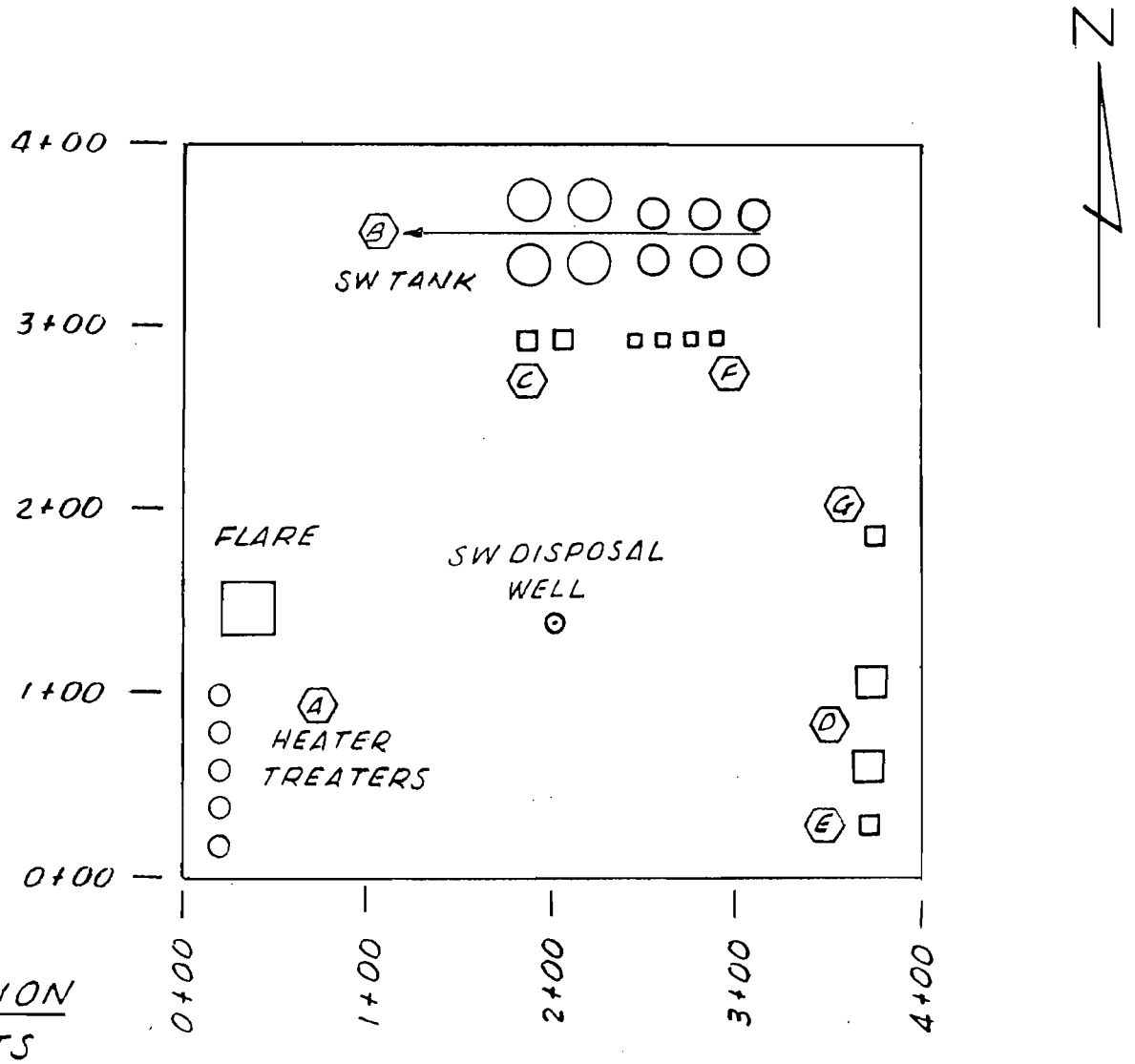
HUMBLE OIL & REFINING COMPANY
PRODUCTION DEPARTMENT
PENSACOLA DISTRICT

DRAWN C.A.M.	ENGR. SECTION Mid Cont. REVISED	SCALE NONE	JOB NO.	FILE NO.
CHECKED	APPROVED	DATE 11-17-52		PDA-230

110-0004

BEST AVAILABLE COPY





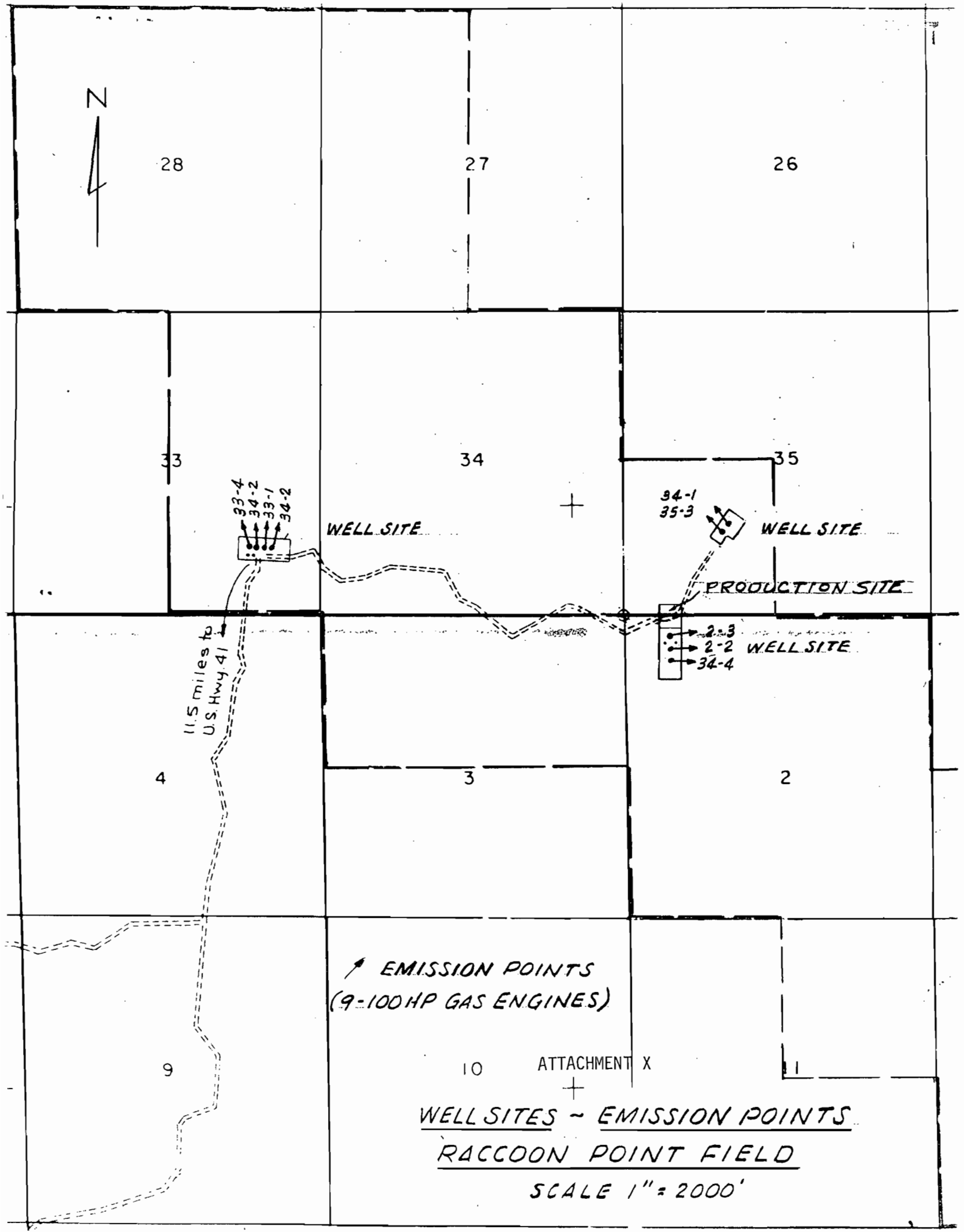
EMISSION POINTS

(A) 5 - GAS BURNING HEATER TREATERS
(B) 9 - CRUDE OIL STORAGE TANKS W/ SINGLE VENT
(C) 2 - SW DISPOSAL PUMPS W/ GAS ENGINES
(D) 2 - OIL LOADING PUMPS W/ GAS ENGINES
(E) 1 - PIPELINE PUMP W/ GAS ENGINE
(F) 4 - CIRCULATING PUMPS W/ GAS ENGINES
(G) 1 - ELECTRIC GENERATOR W/ GAS ENGINE

PLOT PLAN
PRODUCTION SITE ~ EMISSION POINTS
RACCOON POINT FIELD

SCALE 1" = 100'

ATTACHMENT IX



ATTACHMENT X

WELL SITES ~ EMISSION POINTS

RACCOON POINT FIELD

SCALE 1" = 2000'