



APR 26 2012

James Leal  
PROS, Inc.  
P.O. Box 20996  
Bakersfield, CA 93390

**RE: Notice of Final Action - Authority to Construct**  
**Project Number: S-1120268**

Dear Mr. Leal:

The Air Pollution Control Officer has issued Authority to Construct permits to PROS, Inc. for four transportable well test flares, authorized to operate at various unspecified locations within the San Joaquin Valley Air District. Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct was published on March 2, 2012. The District's analysis of the proposal was also sent to CARB on February 22, 2012. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in the consolidation of opacity limits listed on the permits. These changes were minor and did not trigger additional public notification requirements.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

DW: KTR/cm

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



APR 26 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Stationary Source Division  
California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812-2815

**RE: Notice of Final Action - Authority to Construct**  
**Project Number: S-1120268**

Dear Mr. Tollstrup:

Thank you for your comment on the above project. Following are the District's specific responses to your comment:

Comment: The permits list three conditions discussing visible opacity that could be consolidated.

The District has taken the following action on these conditions:

Condition #3 was deleted on all permits.

Condition #10 and 16 on all permits were consolidated as follows:

- Flare shall be equipped with air assist which shall be utilized when needed to maintain visible emissions below Ringlemann 1/4 and 5% opacity for any 3 minute interval in an hour. [District Rules 2201 and 4101]

The Air Pollution Control Officer has issued Authority to Construct permits to PROS, Inc. for four transportable well test flares, authorized to operate at various unspecified locations within the San Joaquin Valley Air District.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

We trust that the above response satisfies your concerns and appreciate your concurrence on this project. On the other hand, if you disagree with the District's position, we would appreciate your prompt response detailing your concerns.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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If you have any questions, regarding the above response, or require additional clarification, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Warner  
Director of Permit Services

DW: KTR/cm

Enclosures

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF AUTHORITY  
TO CONSTRUCT PERMITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to PROS, Inc. for four transportable well test flares, authorized to operate at various unspecified locations within the San Joaquin Valley Air District.

All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in the consolidation of opacity limits listed on the permits. These changes were minor and did not trigger additional public notification requirements.

The application review for Project #S-1120268 is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-7045-11-0

ISSUANCE DATE: 04/16/2012

LEGAL OWNER OR OPERATOR: PROS INC  
MAILING ADDRESS: P O BOX 20996  
BAKERSFIELD, CA 93390-0996

LOCATION: VARIOUS LOCATIONS, SJVUAPCD

EQUIPMENT DESCRIPTION:  
WELL TESTING OPERATION WITH PORTABLE 3.0 MMSCF/DAY FLARE WITH OPTIONAL USE AIR-ASSIST, TWO OR THREE-PHASE TEST SEPARATOR, AND GAS SCRUBBER OPERATED AT VARIOUS UNSPECIFIED LOCATIONS

### CONDITIONS

1. The equipment shall not be located within 1000 ft. of any K-12 school. [CH&SC 42301.6]
2. Flare shall only be used to combust gas released during well testing. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Permittee shall notify the District Compliance Division of each location at which the operation is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 2201]
5. Flare shall not be operated in well testing operations at any location in conjunction with any other flare or combustion equipment operated by Anatesco West. [District Rule 2201]
6. Flare shall not be operated within 4,000 feet of another flare or combustion equipment operated by Anatesco West. [District Rule 4102]
7. This permit shall not authorize the utilization of any IC engine, or other combustion device requiring a separate permit, for powering the air assist to the flare. [District Rule 2201]
8. The unit must not be located and operated at an existing facility or operation such that it becomes part of an existing stationary source as defined by District Rule 2201. [District Rule 2201]
9. Flare shall be equipped with air assist which shall be utilized when needed to maintain visible emissions below Ringlemann 1/4 and 5% opacity for any 3 minute interval in an hour. [District Rules 2201 and 4101]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services  
S-7045-11-0 : Apr 16 2012 2:56PM -- RICKARDK : Joint Inspection NOT Required

10. Flare shall be equipped with operational automatic re-ignition provisions. [District Rule 2201]
11. Gas line to flare shall be equipped with operational, volumetric flow rate indicator. [District Rule 2201]
12. Daily and annual amounts of gas flared shall not exceed 3.0 MMscf/day nor 288 MMscf/yr. [District Rules 2201 and 4102]
13. Flare shall not operate within 1,500 feet from any receptor (residential or offsite work site). [District Rule 4102]
14. No other portable flare listed under S-7045 may be operated at the same location. [District Rule 4102]
15. Sulfur compound concentration of gas flared shall not exceed 5 gr/100 scf. [District Rules 2201 and 4801]
16. Emission rates shall not exceed any of the following: 0.008 lb-PM10/MMBtu, 0.068 lb-NO<sub>x</sub>/MMBtu (as NO<sub>2</sub>), 0.063 lb-VOC/MMBtu, or 0.37 lb-CO/MMBtu. [District Rules 2201 and 4201]
17. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2201]
18. Permittee shall inspect the flare in operation for visible emissions no less frequently than once every two weeks. If visible emissions are observed, corrective action shall be taken. If visible emissions persist, an EPA Method 9 test shall be performed within 72 hours. [District Rule 2201]
19. Permittee shall document compliance with well gas sulfur compound concentration limit by performing sulfur content analysis of well gas upon startup at each new location of operation of flare. [District Rule 2201]
20. The following test methods shall be used for well gas sulfur content: ASTM D3246 or double GC for H<sub>2</sub>S and mercaptan. [District Rule 1081]
21. Permittee shall maintain accurate daily records indicating flare location, flared gas sulfur content at each location, and daily and annual rates of gas flared; and such records shall be made readily available for District inspection upon request for a minimum of 5 years. [District Rules 2201 and 4311]



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-7045-12-0

ISSUANCE DATE: 04/16/2012

LEGAL OWNER OR OPERATOR: PROS INC  
MAILING ADDRESS: P O BOX 20996  
BAKERSFIELD, CA 93390-0996

LOCATION: VARIOUS LOCATIONS, SJVUAPCD

**EQUIPMENT DESCRIPTION:**

WELL TESTING OPERATION WITH PORTABLE 3.0 MMSCF/DAY FLARE WITH OPTIONAL USE AIR-ASSIST, TWO OR THREE-PHASE TEST SEPARATOR, AND GAS SCRUBBER OPERATED AT VARIOUS UNSPECIFIED LOCATIONS

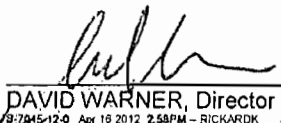
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1. The equipment shall not be located within 1000 ft. of any K-12 school. [CH&SC 42301.6]
2. Flare shall only be used to combust gas released during well testing. [District Rule 2201]
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4. Permittee shall notify the District Compliance Division of each location at which the operation is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 2201]
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7. This permit shall not authorize the utilization of any IC engine, or other combustion device requiring a separate permit, for powering the air assist to the flare. [District Rule 2201]
8. The unit must not be located and operated at an existing facility or operation such that it becomes part of an existing stationary source as defined by District Rule 2201. [District Rule 2201]
9. Flare shall be equipped with air assist which shall be utilized when needed to maintain visible emissions below Ringlemann 1/4 and 5% opacity for any 3 minute interval in an hour. [District Rules 2201 and 4101]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services  
S-7045-12-0, Apr 16 2012 2:58PM - RICKARDK Joint Inspection NOT Required

10. Flare shall be equipped with operational automatic re-ignition provisions. [District Rule 2201]
11. Gas line to flare shall be equipped with operational, volumetric flow rate indicator. [District Rule 2201]
12. Daily and annual amounts of gas flared shall not exceed 3.0 MMscf/day nor 288 MMscf/yr. [District Rules 2201 and 4102]
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20. The following test methods shall be used for well gas sulfur content: ASTM D3246 or double GC for H<sub>2</sub>S and mercaptan. [District Rule 1081]
21. Permittee shall maintain accurate daily records indicating flare location, flared gas sulfur content at each location, and daily and annual rates of gas flared; and such records shall be made readily available for District inspection upon request for a minimum of 5 years. [District Rules 2201 and 4311]





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-7045-13-0

**ISSUANCE DATE:** 04/16/2012

**LEGAL OWNER OR OPERATOR:** PROS INC  
**MAILING ADDRESS:** P O BOX 20996  
BAKERSFIELD, CA 93390-0996

**LOCATION:** VARIOUS LOCATIONS, SJVUAPCD

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-7045-13-0 : Apr 16 2012 2:58PM - RICKARDK : Joint Inspection NOT Required

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## AUTHORITY TO CONSTRUCT

PERMIT NO: S-7045-14-0

ISSUANCE DATE: 04/16/2012

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MAILING ADDRESS: P O BOX 20996  
BAKERSFIELD, CA 93390-0996

LOCATION: VARIOUS LOCATIONS, SJVUAPCD

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DAVID WARNER, Director of Permit Services

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