

April 30, 2021

Mike Poelke
Trio Petroleum LLC
5401 Business Park St, Suite 115
Bakersfield, CA 93309

RE: Notice of Final Action - Authority to Construct
Facility Number: S-9750
Project Number: S-1210009

Dear Mr. Poelke:

The Air Pollution Control Officer has issued the Authority to Construct permit to Trio Petroleum LLC for a transportable well test flare, at various unspecified locations within SJVAPCD. Enclosed are the Authority to Construct permit and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the Authority to Construct permit was posted on March 29, 2021. The District's analysis of the proposal was also sent to CARB on March 29, 2021. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Samir Sheikh
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

April 30, 2021

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

Sincerely,

A handwritten signature in blue ink that reads "Brian Clements". The signature is written in a cursive style with a large initial 'B'.

Brian Clements
Director of Permit Services

BC:ta

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email



Facility # S-9750
TRIO PETROLEUM LLC
5401 BUSINESS PARK S STE 115
BAKERSFIELD, CA 93309-0713

AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
3. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
4. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
5. **Source Test:** Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source_testing.htm for source testing resources.
6. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at
any of the telephone numbers listed below.**

Samir Sheikh

Executive Director/Air Pollution Control Officer

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-9750-1-0

ISSUANCE DATE: 04/28/2021

LEGAL OWNER OR OPERATOR: TRIO PETROLEUM LLC
MAILING ADDRESS: 5401 BUSINESS PARK S STE 115
BAKERSFIELD, CA 93309-0713

LOCATION: VARIOUS UNSPECIFIED

EQUIPMENT DESCRIPTION:
3" DIA. X 20 FT. TALL 62.5 MMBTU MACTRONIC WELL TEST FLARE WITH 316LSS FLARE TIP, MACTRONIC SLIP STREAM IGNITION CHAMBERS, MODEL G60 PILOT ASSIST ASSEMBLY, AND "MAC IGNITOR" MODEL G60 SOLAR POWERED IGNITION SYSTEM OPERATED AT VARIOUS UNSPECIFIED LOCATIONS

CONDITIONS

1. The flare 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. Operation at any specific location by this unit shall not exceed 1 year. [District Rule 4102]
5. 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]
6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 5% opacity. [District Rules 2201 and 4101]
7. Flare shall be equipped with operational automatic re-ignition provisions. [District Rule 2201]
8. Gas line to flare shall be equipped with an operational volumetric flow rate indicator. [District Rule 2201]
9. Daily and annual amounts of gas flared shall not exceed 1.0 MMscf/day nor 150 MMscf/yr. [District Rules 2201 and 4102]
10. Sulfur compound concentration of gas flared shall not exceed 5 gr/100 scf (85 ppmv). [District Rules 2201 and 4801]

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.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-9750-1-0 : Apr 28 2021 9:18AM -- AGUIRRET : Joint Inspection NOT Required

11. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.068 lb/MMBtu; VOC (as methane) - 0.056 lb/MMBtu; CO - 0.310 lb/MMBtu; PM₁₀ - 0.008 lb/MMBtu; or SO_x (as SO₂) - 0.0143 lb/MMBtu. [District Rules 2201, 4201, and 4801]
12. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2201]
13. 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]
14. 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]
15. The following test methods shall be used for well gas sulfur content: ASTM D3246 or double GC for H₂S and mercaptan. [District Rule 1081]
16. 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]