

• Full Application
mailed to region

From: Hank Curry
To: DOMAIN1.SMTPNLM("Jim_Miller@vintagetul.com")
Date: 6/19/98 3:39pm
Subject: Translation Document -Reply

Jim, I got the second msg, not the first, of course. I can read the accounts file, but not the mime file, for whatever reason, for your possible future reference.

Mr. Graef called me, and I believe he knows what needs to be done. He has indicated he will do this in a timely manner, so I will withhold the letters pending what he sends me, at least for a few days.

If we have further need to correspond I will initiate that correspondence, otherwise thanks for your attention in this matter.

Henry M. Curry, P.E. Section Manager
Technical Operating Permit Support
Operating Permits Division
TNRCC
P.O. Box 13087
Austin, TX 78711-3087
Tel. (512) 239-1264

>>> "Jim Miller" <Jim_Miller@vintagetul.com> 06/19/98 10:55am >>>
Hank:

Here it is.

Regards,
Jim Miller

FACSIMILE COVER PAGE

To: Mr. Hank Curry	From: Jim Mi
Time: 11:05:22	Date: 6/19/98
Pages (including cover): 2	

Hank:

Here is the faxed version of the "translation" document.

Regards,
Jim Miller/Vintage Petroleum/Environmental Compliance

Intcroffice Memo

Date: 03/15/95
To: Hung Nguyen
CC: Paul Tebow
From: Jim Miller
Subject: TNRCC Account Numbers for Gulf Coast Area Platforms

I cross referenced the TNRCC offshore account numbers with the VPI common names as I know them. Let me know if you think that these are not correct.

VINTAGE NAME	TNRCC ACCOUNT #	TNRCC NAME
Galveston Bay - Cedar Pt.	GB0373A	Cedar Point Facility
Galveston Bay RFR A1	GB0372C	Galveston Bay Facility
Trinity Bay F1 Platform	CI0057E	Trinity Bay F1 Platform
Trinity Bay F2 Platform	CI0121U	Galveston Bay Facility
Trinity Bay F3 Platform	CI0122S	Trinity Bay F3 Platform
Trinity Bay C2 Platform	CI0058C	Fisher's Reef C2 Platform
Trinity Bay - Pt. Barrow	CI0123Q	Pt. Barrow Facility
Shore Acres	HG7260i	Shore Acres Booster Compression Station

JEM/JEM

Texas Natural Resource Conservation Commission

Interoffice Memorandum

To: To Whom It May Concern
From: Hank Curry, P.E., Section Manger, TOPS
Date: June 19, 1998
Subject: Vintage Petroleum or Vintage Petroleum, Inc.



I had an extended telephone/Fax/E-mail correspondence today with Mr. Jim Miller, Vintage, and also telephonically with Mr. Warren Graef, a consultant for Vintage, regarding their 11 Title V applications in house. My request to them is basically that they either withdraw any one or more or all applications if they are indeed minor sources and not subject to the program, or to provide the full application information on those applications which are major sources and therefore subject to the program.

Mr. Miller called Mr. Graef, who then called me. Mr. Graef has stated that he will do the following:

Send/Fax OP-CRO2s for the change of responsible official from Mr. Quackenbush to the appropriate person (there are two different ROs depending on the site);

correct the account numbers on all of the applications;

correct the SIC codes on all of the applications;

withdraw (by the appropriate RO) all of the applications which are not subject to the program (minor sources);

and send in, within 45 days, the full application information for all of the sites subject to the program.


If Mr. Graef does as he has stated, then we can proceed to revise the applications and then withdraw, void or review the applications.

MFR:

7/20/98

VPI SITUATION STILL CONFUSED AS TO WHO IS RO ON SOME SITES. WE ARE WITHDRAWING /VOIDING THOSE WE CAN.

HMC

IMS #	Site Name	Latest Actions	Proposed Actions
352	Umbrella Point Facility SOP CI-0057-E 	1/28/98 Letter from Curry to Quackenbush, cc Miller, Graef asking for written withdrawal request within 45 days. 3/3/98 (probably, not date stamped) Letter (dated 2/10/98) from Graef to Lowary, requesting withdrawal of application. 3/11/98 Fax from Lowery, with this date, to Miller asking for CRO2 and short letter verifying Graef's letter.	Send letter to Quackenbush, cc Miller, Graef clearly outlining procedure for withdrawing application, and follow up with telephone calls to Miller and Graef.
353	Cedar Point Facility SOP CE-0057-E	1/26/98 Letter from Curry to Quackenbush, cc Miller, Graef asking for written withdrawal request within 45 days. 3/3/98 Letter (dated 2/10/98) from Graef to Lowary, requesting withdrawal of application. 3/11/98 Fax from Lowery, with this date, to Miller asking for CRO2 and short letter verifying Graef's letter.	Send letter to Quackenbush, cc Miller, Graef clearly outlining procedure for withdrawing application, and follow up with telephone calls to Miller and Graef.
354	Trinity Bay A-2 Platform SOP CI-0057-E	1/28/98 Letter from Curry to Quackenbush, cc Miller, Graef asking for written withdrawal request within 45 days. 3/3/98 Letter (dated 2/10/98) from Graef to Lowary, requesting withdrawal of application. 3/11/98 Fax from Lowery, with this date, to Miller asking for CRO2 and short letter verifying Graef's letter.	Send letter to Quackenbush, cc Miller, Graef clearly outlining procedure for withdrawing application, and follow up with telephone calls to Miller and Graef.

356	F-1 Platform SOP CI-0057-E	10/16/97 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file. 1/21/98 Letter from Curry to Quackenbush, cc Miller, Graef asking for previously requested information in 45 days (IS-8 letter). No response in file.	?
404	Trinity Bay C-2 Platform GOP CI-0057-E	6/2/97 "Full" application from Graef recieved 7/25/97 Revised "full" application received 12/17/97 Technical deficiency letter sent, no response 1/8/98 Technical deficiency letter sent by Mike Shultz. 1/22/98 Response to above, but inadequate. Mike Schultz is taking care of this one, he is sending out a deficiency letter (attached), they probably will withdraw because they now believe they are a minor source.	Nothing here, Mike is taking care of this one, but letters should be coordinated.
914	Shore Acres Compression Station SOP CI-0057-E	1/21/98 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file.	Send Full Application Review, Second Notice (IS-8 letter).
925	Galveston Bay A-1 Platform SOP	1/21/98 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file.	Send Full Application Review, Second Notice (IS-8 letter)

CI-0057-E

927	Picoso Compression Station SOP WE-0124-Q	1/26/98 Letter from Curry to Quackenbush, cc Miller, Graef asking for written withdrawal request within 45 days. 3/3/98 Letter (dated 2/10/98) from Graef to Lowary, requesting withdrawal of application. 3/11/98 Fax from Lowery, with this date, to Miller asking for CRO2 and short letter verifying Graef's letter.	Send letter to Quackenbush, cc Miller, Graef clearly outlining procedure for withdrawing application, and follow up with telephone calls to Miller and Graef.
928	Gordin Estates/ West Ranch SOP CB-0041-Y	1/21/98 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file.	Send Full Application Review, Second Notice (IS-8 letter)
931	West Ranch Compressor Station	1/21/98 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file.	Send Full Application Review, Second Notice (IS-8 letter)
934	Altair Compression Station	1/28/98 Letter from Curry to Quackenbush, cc Miller, requesting full application in 45 days (IS-4 letter). No response in file.	Send Full Application Review, Second Notice (IS-8 letter)
	SOP		
	CR-0099-J		

SOP
JB-0049-U



VINTAGE PETROLEUM, INC

June 29, 1998

TNRCC
 Operating Permits Division
 P.O. Box 13807
 Mail Code 163
 Austin, TX 78711-3087

Post-It® Fax Note	7671	Date	6/30/98	# of pages	4
To	MR HANK CURRY	From	Jim Miller		
Co./Dept.	TNRCC	Co.	Vintage Petroleum		
Phone #	512-239-1264	Phone #	918-561-5407		
Fax #	512-239-1070	Fax #	918-560-9520		

Resend 7/1/98

Sent via Certified Mail, Restricted Delivery On 6/30/98

Attn: Mr. Hank Curry

RE: Withdrawal of Title V Permit Applications

Dear Mr. Curry:

Vintage Petroleum, Inc. (VPI) has hired Universal Safety Consultants to assist with the processing of air permits and air permit exemptions for the company's properties in Texas. The attached table lists those properties which are currently exempted under exemptions 6 and 66 of the 1993 standards to the Texas Clean Air Act, Regulation VI.

After careful evaluation and on site testing, our consultant determined that the listed sites do not currently meet the criteria requiring permitting as defined under the Title V of the Clean Air Act. On Vintage's behalf Universal Safety Consultants requested the company's Title V permit applications be withdrawn. The purpose of this letter is to confirm those requests on Company letterhead.

We understand that there is some confusion as to the assigned account numbers, permit numbers and exemption registration numbers for these facilities. The following table was compiled from a synthesis of agency and company sources. The column labelled "Old Account #" contains the account numbers given to us in the past by various agency individuals, but primarily by MS June Shirocky in March, 1995. The last column, labelled "Current Account #", contains the account numbers that you have told Mr. Miller you show in your



Form OP-CRO2
Change of Responsible Official Information (Extension)
Federal Operating Permit Program

V. ADDITIONAL IDENTIFYING INFORMATION		
A. Account No.: CI-0057E	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name:		
A. Account No.: CI-0121U	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name:		
A. Account No.: CI-01225	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name:		
A. Account No.: CI-0058C	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name: TRINITY BAY C-2 PLATFORM		
A. Account No.: CI-0123Q	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name:		
A. Account No.: GB-0372C	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name: GALVESTON BAY A-2 PLATFORM		
A. Account No.: GB-0373A	B. Permit No.: GRANDFATHERED	C. Project No.:
D. Area Name: GALVESTON BAY A-1 PLATFORM		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		
A. Account No.:	B. Permit No.:	C. Project No.:
D. Area Name:		

MEMORY TRANSMISSION REPORT

TIME : JUN-30-98 04:18PM
TEL NUMBER: +
NAME : VINTAGE PETROLEUM INC

FILE NUMBER : 771
DATE : JUN-30 04:05PM
TO : 915122391264
DOCUMENT PAGES : 05
START TIME : JUN-30 04:07PM
END TIME : JUN-30 04:18PM
SENT PAGES : 00
FILE NUMBER : 771

RESEND

*** TX FAILURE NOTICE ***



VINTAGE PETROLEUM, INC

June 29, 1998

TNRCC
Operating Permits Division
P O Box 13807
Mail Code 163
Austin, TX 78711-3087

Post-it Fax Note 7871
Table with columns: To, From, Co, Phone, Fax. Includes handwritten recipient and sender information.

Sent via Certified Mail, Restricted Delivery On 6/30/98

Attn Mr. Hank Curry

RE: Withdrawal of Title V Permit Applications

Dear Mr. Curry

Vintage Petroleum, Inc (VPI) has hired Universal Safety Consultants to assist with the processing of air permits and air permit exemptions for the company's properties in Texas. The attached table lists those properties which are currently exempted under exemptions 6 and 66 of the 1993 standards to the Texas Clean Air Act, Regulation VI.

After careful evaluation and on site testing, our consultant determined that the listed sites do not currently meet the criteria requiring permitting as defined under the Title V of the Clean Air Act. On Vintage's behalf Universal Safety Consultants requested the company's Title V permit applications be withdrawn. The purpose of this letter is to confirm these requests on Company letterhead.

We understand that there is some confusion as to the assigned account numbers, permit numbers and exemption registration numbers for these facilities. The following table was compiled from a synthesis of agency and company sources. The column labelled "Old Account # " contains the account numbers given to us in the past by various agency individuals, but primarily by MS June Shirecky in March, 1995. The last column labelled "Current Account # " contains the account numbers that you have told Mr. Miller you show in your

MEMORY TRANSMISSION REPORT

TIME : JUN-30-98 04:28PM
 TEL NUMBER: +
 NAME : VINTAGE PETROLEUM INC

FILE NUMBER : 772
 DATE : JUN-30 04:16PM
 TO : 915122391264
 DOCUMENT PAGES : 01
 START TIME : JUN-30 04:16PM
 END TIME : JUN-30 04:28PM
 SENT PAGES : 00
 FILE NUMBER : 772

*** TX FAILURE NOTICE ***

Post-It Fax Note 7571		Date 6/30/98	Page 1
To: <i>Don Hank Curry</i>	From: <i>Jim Miller</i>		
Co/Dept: <i>TNRCC</i>	Co: <i>Vintage Petroleum</i>		
Phone: <i>512-239-1264</i>	Phone: <i>918-560-9407</i>		
Fax: <i>512-239-1070</i>	Fax: <i>918-560-9530</i>		

Summary Table of TNRCC Account, Permit and Exemption Numbers

Old Account #	Site Name	Permit #	Exemption #	Current Account #
GB0372C	Trinity Bay A1	O-00925		Unknown
CI0160K	Trinity Bay A2	O-00354	34988	CI0057E
CI0058C	Trinity Bay C2	O-00404		CI0057E
CI0057E	Trinity Bay F1	O-00356		CI0057E
CI0121U	Trinity Bay F2	Unknown		Unknown
CI0122S	Trinity Bay F3	Unassigned		Unknown
<u>CR0099J</u>	Altair Compression Facility	O-00934		CR0099J
CI0123Q	Pt. Barrow Facility	Unknown		Unknown
<u>WE0126Q</u>	Picosa Compression Facility	O-00914		WE0126Q
HG7260I	Shore Acres Compression Facility	O-00914		CI0057E
Unknown	Umbrella Pt. Facility	O-00352	34988	CI0057E



6/30/98
 Note: These 2 sites have Don Williams as their designated representative. According to Warren Grant he has sent you copies of Don's OPCR01 & OPCR02.

Thanks Jim Miller

VINTAGE PETROLEUM APPLICATION/WITHDRAWAL REQUEST SUMMARY

Acc'd

SITE NAME	PERMIT NUMBER	APPLICATION SUBMITTED?	WITHDRAWAL REQUEST SUBMITTED BY RO?
Trinity (or Galveston) Bay A-1	O-00925	Yes <i>GALVESTON BAY FACILITY</i>	Yes
Trinity (or Galveston) Bay A-2	O-00354	Yes	Yes
Trinity Bay C-2	O-00404	Yes	Yes
Trinity Bay F-1	O-00356	Yes <i>TRINITY BAY F-1</i>	Yes
Altair Compression Station	O-00934	Yes	Yes
Picoso Compression Facility	O-00927	Yes	Yes
Shore Acres Compression Facility	O-00914	Yes	Yes
Umbrella Pt. Facility	O-00352	Yes	Yes
Trinity Bay F-2	None	No	Yes
Trinity Bay F-3	None	No	Yes
Pt. Barrow Facility	None	No	Yes
Cedar Point Tank Battery	O-00353	Yes	No
Gordin Estate/West Ranch	O-00928	Yes	No
West Ranch Compression Station	O-00931	Yes	No

GB0372C

? NONE

CI-0058-

CI 0057

? NONE

WE01260

467260I

? NONE

CI 0121

GL 0373A

UNIVERSAL SAFETY CONSULTANTS

ENVIRONMENTAL, HEALTH AND SAFETY DIV.

P.O. BOX 570324
 HOUSTON, TEXAS 77040-0324
 TEL: (281) 342-9555 FAX: (281) 344-9709
 e-mail wgracf@swbell.net

June 12, 1998

Mr. Hank Curry
 Operating Permits Division
 Texas Natural Resources Commission
 P.O. Box 13087
 Austin, TX 78711-3087

Re: Vintage Petroleum Title V Accounts

Dear Mr. Curry:

Enclosed are the items we discussed on Friday June 19, 1998 in our telephone conversation with the exception of the OP-CRO1&2 signed by Mr. Nyguen. We are obtaining another copy from Mr. Nyguen which will be forwarded to you shortly. The OP-CRO1&2 signed by Mr. Don Williams is enclosed for your review along with the correct TNRCC account numbers for the 11 areas in question. I am also sending a copy of the OSIA SIC codes for the Oil and Gas locations which originally is filed under 1300 series. These locations are SIC 1311 and do not meet the criteria for any other codes.

The account numbers requested are as follows

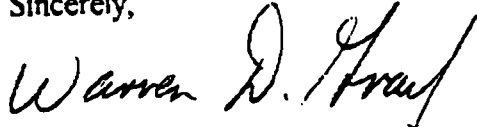
File Number	Account name	Account Number
O-0352	Umbrella Point Compression Station is	Not on File at this office
O-00353	Cedar Point Tank Battery	GB-0373-A
✓O-00354	Galveston Bay A-2 Platform	GB-0372-C
O-00356	Trinity Bay F-1 Platform	CI-0057-E
O-00404	Trinity Bay C-2 Platform	CI-0058-C
O-00914	Shore Acres Compression Station	HG-7260-I
O-00925	Galveston Bay A-1 Platform	<u>GB-372-C</u> GB-0372-C
O-00927	Picasso Compressor Station	WE-0126-Q
O-00928	Gordin Estates/West Ranch	CB-0061-B CRO-2
O-00931	West Ranch Compression Station	JB-0049-U CRO-2
O-00934	Altair Compression Station	CR-0099-J CRO-2

Vintage Petroleum Title V Accounts (Cont'd)
Page 2

The two facilities that we do not find an Emissions Inventory account are Umbrella Point and Galveston Bay A-2 platform. While I am certain that these two have active accounts, we do not have them currently. I will contact the Emissions inventory people and get them and furnish them to you this week.

Please contact me if you have any questions.

Sincerely,



Warren Graef,
Certified Hazardous Materials Manager

3 Enclosures



Form OP-CRO2 Change of Responsible Official Information Federal Operating Permit Program

The Texas Natural Resource Conservation Commission (TNRCC) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification. (A revised Certificate of Representation must also be submitted to the U.S. Environmental Protection Agency for changes in the DR and ADR.) *After the initial submittal, if there is a change of Duty Authorized Representative (DAR) appointment or an administrative information change for the DAR, include a revised Form OP-DEL with the next submittal to the TNRCC.*

I. IDENTIFYING INFORMATION

A. Account No.: CR-0099-J	B. Permit No.:	C. Project No.:
D. Area Name: Altair Compression Station		
E. Company Name: Vintage Petroleum		

II. CHANGE TYPES

A. Action Type:	New Appointment	<input checked="" type="checkbox"/>	Administrative Information Change	
B. Contact Type <i>(Only one response can be accepted per form.)</i>				
Responsible Official	<input checked="" type="checkbox"/>	Designated Representative		Alternate Designated Representative

III. RESPONSIBLE OFFICIAL/DESIGNATED REPRESENTATIVE/ALTERNATE DESIGNATED REPRESENTATIVE INFORMATION

A. Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Don Williams		
B. Title: Production Manager		C. Effective Date: March 1, 1998
D. Telephone: (918) 592-0101		E. Fax:
F. Company Name: Vintage Petroleum, Inc.		
G. Mailing Address: 4200 One Williams Center		
City: Tulsa	State: OK	Zip Code: 74172
H. Delivery Address: 4200 One Williams Center		
City: Tulsa	State: OK	Zip Code: 74172

IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

This certification does not extend to information which is designated by the TNRCC as information for reference only.

I, Don Williams (Name printed or typed), certify that, based on information and belief formed after reasonable inquiry, the statements and information stated above are true, accurate, and complete.

Signature: Don Williams Signature Date: May 26, 1998

Title: Production Manager

* If this RO, DR, or ADR has certification authority on any additional account numbers or permit projects, please list them on the following page of this Form OP-CRO2.



SIC Description for 1311

Division B: Mining

Major Group 13: Oil And Gas Extraction

Industry Group 131: Crude Petroleum And Natural Gas

1311 Crude Petroleum and Natural Gas

Establishments primarily engaged in operating oil and gas field properties. Such activities may include exploration for crude petroleum and natural gas; drilling, completing, and equipping wells; operation of separators, emulsion breakers, desilting equipment, and field gathering lines for crude petroleum; and all other activities in the preparation of oil and gas up to the point of shipment from the producing property. This industry includes the production of oil through the mining and extraction of oil from oil shale and oil sands and the production of gas and hydrocarbon liquids through gasification, liquid fraction, and pyrolysis of coal at the mine site. Also included are establishments which have complete responsibility for operating oil and gas wells for others on a contract or fee basis. Establishments primarily engaged in performing oil field services for operators on a contract or fee basis are classified in Industry Group 138.

- Coal gasification at the mine site
- Coal liquefaction at the mine site
- Coal pyrolysis at the mine site
- Crude oil production
- Crude petroleum production
- Kerogen processing
- Natural gas production
- Oil sand mining
- Oil shale mining
- Tar sands mining

[SIC Search](#) | [Division Structure](#) | [Major Group Structure](#) | [OSHA Standards Cited](#) |

[Comments & Info](#) | [OSHA Home Page](#) | [OSHA-OCIS](#) | [U.S. DOL Web Site](#) | [Disclaimer](#) |

Date: Thu, 20 Nov 1997 14:25:26 -0600
From: Kevin Bloomer <KBLOOMER@tnrcc.state.tx.us>
To: 104076.1131@compuserve.com. wgraef@swbell.net

Subject: Vintage Petroleum's Title V applications

Dear Messrs. Miller and Graef:

I spoke with Warren Graef about Vintage Petroleum's Title V applications submitted to the Operating Permits Division of the Texas Natural Resource Conservation Commission (TNRCC). Warren was able to clear up the major source status for several of the 11 applications that have been submitted. I would like to thank him for his efforts and pass along the results of our conversation. Warren has told me that the following sites are indeed minor sources with respect to their potential to emit and that a Title V application is not required for them. These minor sources are as follows

Umbrella Point Gas Process Station - IMS # 352
Cedar Point Facility (Cedar Point Facility) - IMS # 353
A-2 Platform - IMS # 354
Picoso Compressor Station - IMS # 927
Altair Compressor Station - IMS # 934

Warren has also confirmed that the other six applications that you have submitted are for major sources, based on their potential to emit. These major sources are as follows:

F-1 Platform (Trinity Bay F-1 Platform) - IMS # 356
Galveston Bay, A-1 Platform (Galveston Bay Facility) - IMS # 925
West Ranch Compressor Station - IMS # 931
Gardin Estates/West Ranch - IMS # 928
Trinity Bay, C-2 Platform (Fishers Reef C-2 Platform) - IMS # 404
Shore Acres Compressor Station - IMS # 914

The TNRCC would like to void the Title V applications for the five minor sources. We respectfully request that Vintage Petroleum void these applications by means of a letter addressed to Mr. Hank Curry (mailing address: Operating Permits Division, MC 163, TNRCC, P. O. Box 13087, Austin TX 78711-3087). The letter should state that Vintage understands that the sites listed are minor sources and would like to withdraw the Title V applications for these sites. The letter should be signed by Mr. Barry Quackenbush, the Responsible Official for Vintage Petroleum, or it could be signed by either Warren Graef or Jim Miller and be transmitted with a completed OP-CRO1 form (which has to be signed and dated by the Responsible Official). If you have any questions, please feel free to contact either Chuck Lowary at (512) 239-1263, Hank Curry at (512) 239-1264, or myself at (512) 239-5730. Thank you again for your attention to this matter.

Sincerely, Kevin Bloomer



Protecting Texas
by Reducing and
Preventing Pollution

F A X T R A N S M I T T A L

DATE: 03/11/98

NUMBER OF PAGES (including this cover sheet):

1
0

TO: Name Mr. Jim Miller
Organization Vintage Petroleum
FAX Number (918)560-9520

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Name Chuck Lowary
Division/Region Operating Permits Program
Telephone Number (512) 239-1263
FAX Number (512) 239-1323

NOTES:

Dear Mr. Miller:

Attached is a sample OP-CRO2 and a copy of §122.165, Certification by a Responsible Official, as discussed yesterday in our telephone conversation. Please note that both the OP-CRO2 and OP-DEL allow for the capability to include additional account numbers or permit/project numbers to decrease the paperwork required by either the RO or DAR.

Recommend that the cleanest way to accomplish the withdrawal of your facilities which we discussed yesterday would be to have your responsible official accomplish an OP-CRO2 and include it with a short letter verifying Mr. Graef's withdrawal proposals for the four facilities attached.

For your future information, our Internet address is <http://www.tnrcc.state.tx.us/air/opd>

I will follow this fax with another with copies of OP-CRO2 and OP-DEL forms and instructions attached for use until you find them on the web.

if you have any further questions, please don't hesitate to call.

Sincerely,

Chuck Lowary
Technical Operating Permit Support
Operating Permits Division

UNIVERSAL SAFETY CONSULTANTS

ENVIRONMENTAL, HEALTH AND SAFETY DIV.

P.O. BOX 570324

HOUSTON, TEXAS 77040-0324

TEL: (281) 342-9555 FAX: (281) 344-9709

February 10, 1998

PROCESSED BY TOPS
RECEIVED BY me
DATE 3/9/98

Mr. M. Chuck Lowary
Operating Permits Division (MC 163)
Texas Natural Resources Conservation Commission
P.O. Box 13807
Austin, Texas 78711-3087

Re: Umbrella Point Gas Processing Station
Project Number: 352

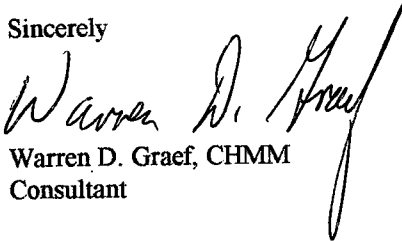
Dear Mr. Lowary

My company was hired by Vintage Petroleum Incorporated to assist with the processing of permit and permit exemptions for their holdings in Texas. This site is currently exempted under exemptions 6 and 66 of the 1993 standards to the Texas Clean Air Act Regulation VI. After careful evaluation and on site testing, we have determined that this site does not currently meet the criteria as defined under Title V of the Clean Air Act and on behalf of our client, we request the title V permit application be withdrawn.

Please forward any correspondence related to this matter to this office or to Mr. Jim Miller, Environmental Specialist, Vintage Petroleum, Inc. 4200 One Williams Center, Tulsa, OK 74172.

Thank you for your assistance.

Sincerely



Warren D. Graef, CHMM
Consultant

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

January 28, 1998

Mr. Barry Quackenbush
Vice President for Marketing
Vintage Petroleum
4200 One Williams Center
Tulsa, Oklahoma 74172

Re: Full Application Review
Initial Issuance
Project Number: 352
Permit Number: O-00352

Vintage Petroleum
Umbrella Point Gas Process Station
Baytown, Chambers County
Account Number: TBA

Dear Mr. Quackenbush:

According to our records, your company submitted to the Texas Natural Resource Conservation Commission an abbreviated application for a federal operating permit on March 4, 1997. We understand that you are considering withdrawal of your Federal Operating Permit application since this facility may not be a major source of potential emissions, as defined in § 122.10(8). If you determine that the facility is a minor source, please submit a written withdrawal request no later than 45 days from the date of this letter.

In the event that you determine that the facility is still a major source, the Operating Permits Division staff is ready to begin review of your application. You are requested to submit all remaining application materials for the area addressed by your application. This information must be submitted no later than 45 days from the date of this letter. All updates to the application must be submitted with a Certification By Responsible Official (Form OP-CRO1).

Upon receipt of the information, we will proceed with the administrative and technical review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible.

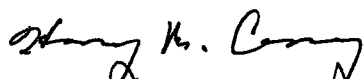
Mr. Barry Quackenbush

Page 2

January 28, 1998

If you have submitted the requested information, please disregard this notice. Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact Mr. Chuck Lowary at (512) 239-1263.

Sincerely,



Henry M. Curry, P.E., Unit Leader
Technical Operating Permit Support
Operating Permits Division (MC 163)
Texas Natural Resource Conservation Commission

HMC/ECL/pll

cc: Mr. James E. Miller, Environmental Compliance Specialist, Vintage Petroleum Company,
Tulsa, Oklahoma
Mr. Warren D. Graef, CHMM, Consultant, Universal Safety Consultants, Houston

From: Hank Curry
To: KBLOOMER
Date: 11/26/97 1:10pm
Subject: Vintage Petroleum's Title V applications -Reply

Kevin, THanks. Maybe we will eventually put this to rest.

>>> Kevin Bloomer 11/20/97 02:37pm >>>
Dear Messrs. Miller and Graef:

I spoke with Warren Graef about Vintage Petroleum's Title V applications submitted to the Operating Permits Division of the Texas Natural Resource Conservation Commission (TNRCC). Warren was able to clear up the major source status for several of the 11 applications that have been submitted. I would like to thank him for his efforts and pass along the results of our conversation. Warren has told me that the following sites are indeed minor sources with respect to their potential to emit and that a Title V application is not required for them. These minor sources are as follows:

Umbrella Point Gas Process Station - IMS # 352 ,
Cedar Point Facility (Cedar Point Facility) - IMS # 353
A-2 Platform - IMS # 354 ` -
Picoso Compressor Station - IMS # 927 1
Altair Compressor Station - IMS # 934 .

Warren has also confirmed that the other six applications that you have submitted are for major sources, based on their potential to emit. These major sources are as follows:

F-1 Platform (Trinity Bay F-1 Platform) - IMS # 356 ♣
Galveston Bay, A-1 Platform (Galveston Bay Facility) - IMS # 925 ♣
West Ranch Compressor Station - IMS # 931 ♣
Gardin Estates/West Ranch - IMS # 928 ♣
Trinity Bay, C-2 Platform (Fishers Reef C-2 Platform) - IMS # 404
Shore Acres Compressor Station - IMS # 914 ♣

The TNRCC would like to void the Title V applications for the five minor sources. We respectfully request that Vintage Petroleum void these applications by means of a letter addressed to Mr. Hank Curry (mailing address: Operating Permits Division, MC 163, TNRCC, P. O. Box 13087, Austin TX 78711-3087). The letter should state that Vintage understands that the sites listed are minor sources and would like to withdraw the Title V applications for these sites. The letter should be signed by Mr. Barry Quackenbush, the Responsible Official for Vintage Petroleum, or it could be signed by either Warren Graef or Jim Miller and be transmitted with a completed OP-CRO1 form (which has to be signed and dated by the Responsible Official). If you have any questions, please feel free to contact either Chuck Lowary at (512) 239-1263, Hank Curry at (512) 239-1264, or myself at (512) 239-5730. Thank you again for your attention to this matter.

Sincerely, Kevin Bloomer

CC: ELOWARY

From: Kevin Bloomer
To: internet."104076.1131@compuserve.com", internet:"w...
Date: 11/20/97 2:25pm
Subject: Vintage Petroleum's Title V applications

Dear Messrs. Miller and Graef:

I spoke with Warren Graef about Vintage Petroleum's Title V applications submitted to the Operating Permits Division of the Texas Natural Resource Conservation Commission (TNRCC). Warren was able to clear up the major source status for several of the 11 applications that have been submitted. I would like to thank him for his efforts and pass along the results of our conversation. Warren has told me that the following sites are indeed minor sources with respect to their potential to emit and that a Title V application is not required for them. These minor sources are as follows:

Umbrella Point Gas Process Station - IMS # 352
Cedar Point Facility (Cedar Point Facility) - IMS # 353
A-2 Platform - IMS # 354
Picoso Compressor Station - IMS # 927
Altair Compressor Station - IMS # 934

Warren has also confirmed that the other six applications that you have submitted are for major sources, based on their potential to emit. These major sources are as follows:

F-1 Platform (Trinity Bay F-1 Platform) - IMS # 356
Galveston Bay, A-1 Platform (Galveston Bay Facility) - IMS # 925
West Ranch Compressor Station - IMS # 931
Gardin Estates/West Ranch - IMS # 928
Trinity Bay, C-2 Platform (Fishers Reef C-2 Platform) - IMS # 404
Shore Acres Compressor Station - IMS # 914

The TNRCC would like to void the Title V applications for the five minor sources. We respectfully request that Vintage Petroleum void these applications by means of a letter addressed to Mr. Hank Curry (mailing address: Operating Permits Division, MC 163, TNRCC, P. O. Box 13087, Austin TX 78711-3087). The letter should state that Vintage understands that the sites listed are minor sources and would like to withdraw the Title V applications for these sites. The letter should be signed by Mr. Barry Quackenbush, the Responsible Official for Vintage Petroleum, or it could be signed by either Warren Graef or Jim Miller and be transmitted with a completed OP-CRO1 form (which has to be signed and dated by the Responsible Official). If you have any questions, please feel free to contact either Chuck Lowary at (512) 239-1263, Hank Curry at (512) 239-1264, or myself at (512) 239-5730. Thank you again for your attention to this matter.

Sincerely, Kevin Bloomer

CC: HCURRY, ELOWARY

Mail Envelope Info: (34749CB6.6) 22 : 28062)

Subject: Vintage Petroleum's Title V applications
Creation Date: 11/20/97 2:25pm
From: Kevin Bloomer

Created By: LEGAL.NSRPO:KBLOOMER

Recipients	Action	Date & Time
Post Office FLDDOM1.CORPO GLOPEZ BC (Guadalupe Lopez)		
Post Office FLDDOM3.HOUPO DFLANNER BC (Dick Flannery)	Delivered	11/20/97 02:29pm
Post Office FO.FOPO BTOUPS BC (Brad Toups) RVILLARR BC (Robert Villarreal)	Delivered	11/20/97 02:31pm
Post Office internet No More Status "104076.1131@compuserve.com" "wgraef@swbell.net"	Transferred	11/20/97 02:31pm 11/20/97 02:31pm
Post Office LEGAL.NSRPO ELOWARY CC (Chuck Lowary) HCURRY CC (Hank Curry)	Delivered	11/20/97 02:37pm

Domain.Post Office	Delivered	Route
FLDDOM1.CORPO	Pending	FLDDOM1.CORPO
FLDDOM3.HOUPO	11/20/97 02:29pm	FLDDOM3.HOUPO
FO.FOPO	11/20/97 02:31pm	FO.FOPO
internet		internet
LEGAL.NSRPO	11/20/97 02:37pm	LEGAL.NSRPO

Files	Size	Date & Time
MESSAGE	2282	11/20/97 02:25pm

Options
Auto Delete: No
Expiration Date: None
Notify Recipients: Yes
Priority: Normal
Reply Requested: No
Return Notification:
Send Notification when Opened

Concealed Subject: No
Security: Normal

To Be Delivered: Immediate
Status Tracking: Delivered & Opened

From: Jim Miller <104076.1131@compuserve.com>
To: "Mr. Bloomer" <kbloomer@tnrcc.state.tx.us>
Date: 9/17/97 11:16am
Subject: Account Numbers

Mr. Bloomer:

Here is a document that I have in MS Word, version 6.0., that details the TNRCC account numbers we have historically worked with.

Hope this helps.

Jim Miller
Environmental Compliance,
Vintage Petroleum

From: Kevin Bloomer
To: internet:"104076.1131@compuserve.com"
Date: 9/17/97 11:26am
Subject: Account Numbers -Reply

I received your e-mail, but the attached file was not useable. We use WordPerfect 6.1. I was not able to convert it using WordPerfect from the MS Word for Windows 6.0 format or from ASCII (DOS) text format. I also noted that the file size was only 58 bytes. Could you please resend the file as a part of your message body in the e-mail? Thanks for your assistance, Kevin Bloomer

>>> Jim Miller <104076.1131@compuserve.com> 09/17/97 11:16am >>>
Mr. Bloomer:

Here is a document that I have in MS Word, version 6.0., that details the TNRCC account numbers we have historically worked with.

Hope this helps.

Jim Miller
Environmental Compliance,
Vintage Petroleum

CC: HCURRY

From: Jim Miller <104076.1131@compuserve.com>
To: "Mr. Bloomer" <kbloomer@tnrcc.state.tx.us>
Date: 9/17/97 3:09pm
Subject: POSSIBLY Incomplete Message: Accounts Information

Kevi:

Here is another try. Am having trouble connecting with Compuserve.

Regards,
Jim Miller

From: Kevin Bloomer
To: internet:"104076.1131@compuserve.com"
Date: 9/17/97 4:37pm
Subject: Account Numbers -Reply

Here is some of the information that we have on hand as a result of the 11 permit applications that we have received from Vintage. If possible, I would appreciate if you could confirm or supply the correct primary account numbers for each of the sites, since this information was missing from each of the applications. The F-1 Platform and A-1 Platform are the most important sites, due to their major source status. The other nine applications will probably be voided since the application information in OP-1 indicates that the sites are not major sources. I have also listed the two that I obtained from you during our telephone conversation earlier today. The IMS# is our project number for your permit application, and the form OP-1 is the Initial Application Information form. It may be better if you faxed me the information to the following number, (512) 239-1070, since e-mail doesn't seem to be working well. Thanks for your assistance, Kevin Bloomer

IMS# 352 Umbrella Point Gas Process Station, ACCT NO.=? none listed in OP-1,

IMS# 353 Cedar Point Facility ACCT NO.=? none listed in OP-1, GB-0373-A

IMS# 354 A-2 Platform ACCT NO.=? none listed in OP-1,

IMS# 356 F-1 Platform (Trinity Bay F-1 Platform) ACCT NO.=? none listed in OP-1,

IMS# 404 Trinity Bay, C-2 Platform (Fishers Reef C-2 Platform) ACCT NO.=? none listed in OP-1,

IMS# 914 Shore Acres Compressor Station ACCT NO.=? none listed in OP-1,

IMS# 925 Galveston Bay, A-1 Platform (Galveston Bay Facility) ACCT NO.=? none listed in OP-1, GB-0372-C

IMS# 927 Picoso Compressor Station ACCT NO.=? none listed in OP-1,

IMS# 928 Gardin Estates/West Ranch ACCT NO.=? none listed in OP-1,

IMS# 931 West Ranch Compressor Station ACCT NO.=? none listed in OP-1,

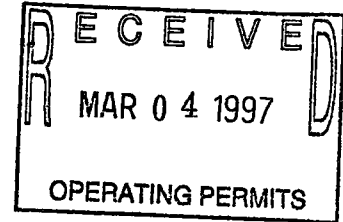
IMS# 934 Altair Compressor Station ACCT NO.= ? none listed in OP-1,

CC: HCURRY

#359
UNIVERSAL SAFETY CONSULTANTS

P.O. Box 570324
Houston, Texas 77027-0324
Tel: (281) 342-9555 Fax: (281) 344-9709

February 21, 1997



Mr. Bruce Mc Farland
Operating Permits Division
Texas Natural Resources Conservation Commission
P.O. Box 13807
Austin, Texas 78711-3087

Re: Umbrella Point Gas Processing Station

Dear Mr. Mc Farland:

Enclosed are the forms for an abbreviated Operating Permit for the Umbrella Point Gas Processing Station.. NOx emissions will be 10 tpy but VOC emissions are estimated to be around 23tpy. The total pollutants from all categories are below 100 tpy.

We recommend that a temporary site permit be issued. Please review these documents and advise me if you need additional information or documentation.

Sincerely,

Warren D. Graef
Warren D. Graef CHMM
Consultant

**APPLICATION INFORMATION
DISTRICT 20**

Permit Number :O-00361
Project Type :Site Operating Permit
Company Name :American Trading and Production Corporation
Site Name :South Cleveland Field
Account Number :LH0196V
Near City :Cleveland
Facility Type :Petroleum and Natural Gas

Permit Number :O-00352
Project Type :Site Operating Permit
Company Name :Vintage Petroleum
Site Name :Umbrella Point Gas Process Station
Account Number :
Near City :Baytown
Facility Type :Petroleum and Natural Gas

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 30, 1997

The Honorable Zeb D. Zbranek
Texas House of Representatives
P.O. Box 2910
Austin, Texas 78768-2910

Re: Accepted Applications

Dear Mr. Zbranek:

The Texas Natural Resource Conservation Commission (TNRCC) has received several Federal Operating Permit applications and one Acid Rain Permit application for sites located in your district. The attached list provides application information supplied to the TNRCC by the applicants.

These applications are required by Title IV and Title V of the Federal Clean Air Act (FCAA) as amended in 1990 and by § 382.054 et seq. of the Texas Clean Air Act (TCAA). If the agency determines that an application complies with all state and federal requirements, the TNRCC will issue a Federal Operating Permit which is an authorization to operate the equipment at the site or area addressed by the application.

The Federal Operating Permit Program, required by the FCAA, is a new program requiring existing major sources of emissions in Texas to apply for a Federal Operating Permit. The goal of the program is to improve air quality in Texas through increased compliance and awareness from the codification of existing applicable regulatory requirements contained in the Federal Operating Permit.

Mr. Zeb Zbranek

Page 2

May 30, 1997

This letter fulfills the requirements of § 382.0516 of the TCAA, Texas Health and Safety Code, which requires notification to you that the TNRCC has received several Federal Operating Permit applications and one Acid Rain Permit application. If you need further information, please contact me at (512) 239-1334.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen N. T. Olson". The signature is written in a cursive style with a large initial "K".

Karen N. T. Olson, P.E., Director
Operating Permits Division (MC-163)
Texas Natural Resource Conservation Commission

KTO/HMC/pll

Attachment

APPLICATION INFORMATION
DISTRICT 04

Permit Number :O-00354
Project Type :Site Operating Permit
Company Name :Vintage Petroleum
Site Name :A-2 Gas Platform
Account Number :
Near City :Baytown
Facility Type :Petroleum and Natural Gas

Permit Number :O-00353
Project Type :Site Operating Permit
Company Name :Vintage Petroleum
Site Name :Cedar Point Facility
Account Number :
Near City :Baytown
Facility Type :Petroleum and Natural Gas

Permit Number :O-00352
Project Type :Site Operating Permit
Company Name :Vintage Petroleum
Site Name :Umbrella Point Gas Process Station
Account Number :
Near City :Baytown
Facility Type :Petroleum and Natural Gas

Permit Number :O-00107
Project Type :Site Operating Permit
Company Name :Koch Hydrocarbon Company
Site Name :Mont Belvieu Fractionator
Account Number :CI0005A
Near City :Mont Belvieu
Facility Type :1321

Permit Number :O-00204
Project Type :General Operating Permit
Company Name :Koch Hydrocarbon Company
Site Name :Mont Belvieu Fractionator
Account Number :CI0005A
Near City :Mont Belvieu
Facility Type :1321

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 29, 1997

The Honorable Michael L. Galloway
Texas Senate
P. O. Box 12068
Capitol Station
Austin, Texas 78711

Re: Accepted Applications

Dear Senator Galloway:

The Texas Natural Resource Conservation Commission (TNRCC) has received several Federal Operating Permit and Acid Rain Permit applications for sites located in your district. The attached list provides application information supplied to the TNRCC by the applicants

These applications are required by Title IV and Title V of the Federal Clean Air Act (FCAA) as amended in 1990 and by § 382.054 et seq. of the Texas Clean Air Act (TCAA). If the agency determines that an application complies with all state and federal requirements, the TNRCC will issue a Federal Operating Permit which is an authorization to operate the equipment at the site or area addressed by the application.

The Federal Operating Permit Program, required by the FCAA, is a new program requiring existing major sources of emissions in Texas to apply for a Federal Operating Permit. The goal of the program is to improve air quality in Texas through increased compliance and awareness from the codification of existing applicable regulatory requirements contained in the Federal Operating Permit.

Senator Michael L. Galloway

Page 2

May 29, 1997

This letter fulfills the requirements of § 382.0516 of the TCAA, Texas Health and Safety Code, which requires notification to you that the TNRCC has received several Federal Operating Permit and Acid Rain Permit applications. If you need further information, please contact me at (512) 239-1334.

Sincerely,

A handwritten signature in black ink that reads "Karen N. T. Olson". The signature is written in a cursive style with a large initial "K" and "O".

Karen N. T. Olson, P.E., Director
Operating Permits Division (MC-163)
Texas Natural Resource Conservation Commission

KTO/HMC/pll

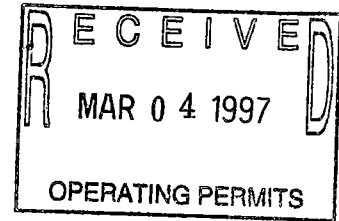
Attachment

#359

UNIVERSAL SAFETY CONSULTANTS

P.O. Box 570324
Houston, Texas 77027-0324
Tel: (281) 342-9555 Fax: (281) 344-9709

February 21, 1997



Mr. Bruce Mc Farland
Operating Permits Division
Texas Natural Resources Conservation Commission
P.O. Box 13807
Austin, Texas 78711-3087

Re: Umbrella Point Gas Processing Station

Dear Mr. Mc Farland:

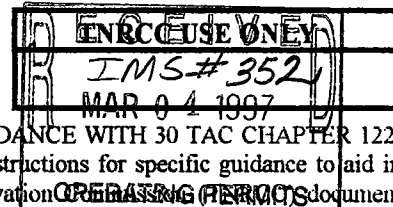
Enclosed are the forms for an abbreviated Operating Permit for the Umbrella Point Gas Processing Station.. NO_x emissions will be 10 tpy but VOC emissions are estimated to be around 23tpy. The total pollutants from all categories are below 100 tpy.

We recommend that a temporary site permit be issued. Please review these documents and advise me if you need additional information or documentation.

Sincerely,

Warren D. Graef
Warren D. Graef CHMM
Consultant

Form OP-1
Initial Application (Page 1)
Texas Federal Operating Permit

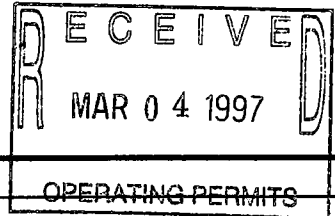


EACH SITE REQUIRED TO OBTAIN ONE OR MORE FEDERAL OPERATING PERMIT IN ACCORDANCE WITH 30 TAC CHAPTER 122, MUST COMPLETE AND SUBMIT THIS APPLICATION FOR EACH PERMIT. Refer to the form instructions for specific guidance to aid in completing this application. General information is provided in the Texas Natural Resource Conservation Commission document entitled "Federal Operating Permit Application Guidance." Print or type all information. Failure to supply any information requested may result in loss of the application shield as defined in 30 TAC §122.138. Please direct any questions regarding this application form to the Office of Air Quality, Operating Permits Division at (512)239-1334 (Fax No. [512]239-1070). Address written inquiries to TNRCC, Office of Air Quality, Operating Permits Division, Mail Code 163, P.O. Box 13087, Austin, Texas 78711-3087.

I. COMPANY IDENTIFYING INFORMATION				
A.* Company Name: VINTAGE PETROLEUM				
B. Telephone: (918) 592-0101		C. Fax: (918) 584-7282		
D.* Mailing Address: 4200 One Williams Center				
City: Tulsa		State: OK		Zip Code: 74172
E.* Submittal Date: February 11, 1997				
II. PERMIT TYPE (Place An "X" In The Appropriate Box)				
A.* Indicate The Type Of Permit Requested:				
Site Operating Permit (SOP) <input checked="" type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP) <input type="checkbox"/>				
III. APPLICATION TYPE			YES	NO
<i>(The Following Questions Determine Abbreviated Application Eligibility - Place An "X" In The Appropriate Box)</i>				
A.* Is there a Notice of Violation in process for a relevant unit in the area addressed by this application?				XXX
B.* Is there a relevant unit in the area addressed by this application that is currently under a formal enforcement action? <i>If the response to question III.A or III.B is "YES," continue with the full SOP or TOP application process using all appropriate forms.</i>				XXX
C.* Is the site subject to Title IV (Acid Rain)? <i>If the response to question III.C is "YES," continue with the full SOP application process using all appropriate forms. Include those forms required for an acid rain permit if not already submitted. If the responses to ALL questions III.A through III.C are "No," the applicant may submit an abbreviated application consisting of this form, the Initial Federal Operating Permit Application (Form OP-1), and a Certification by Responsible Official (Form OP-CRO1). If completed properly and submitted prior to the required deadline, the abbreviated application will provide an application shield as described in 30 TAC §122.138 for that site. Applicants submitting the necessary forms within the specified deadlines may continue to operate under an application shield consistent with 30 TAC §122.138. At a future date, applicants that have submitted an abbreviated application will be notified by TNRCC Operating Permits Division and requested to provide the remainder of the required application information.</i>				XXX
IV. ACCOUNT NUMBERS				
A.* Primary TNRCC Account Number:				
B.	Additional TNRCC Account Nos:	CI-0057-E	GB-0044-W	GB-0373-A GB-0372-C
CI-0121-U	CI-0058-C			

Note: All items must be completed for the initial application submittal. Only information indicated by the "*" is required for subsequent submittals (including full application submittal follow-up to an abbreviated application). Other information must be completed for subsequent submittals only if it varies from the most recent submittal.

Texas Natural Resource Conservation Commission
Form OP-1
Initial Application (Page 2)
Texas Federal Operating Permit



V.* CONFIDENTIAL INFORMATION	
Is CONFIDENTIAL information submitted in conjunction with this application (Yes/No)	NO

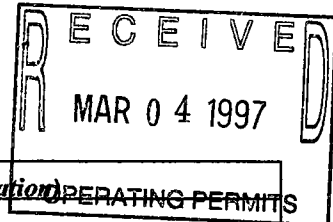
VI. INITIAL APPLICATION INFORMATION			
A.	Total proposed number of SOPs and/or TOPs at the site.	1	
B.	Total proposed number of GOPs at the site.	0	
C.* Provide a "permit name" for this application in the space below. (If there is only one permit at the site the Permit Name is the same as the Site Name in Section VI.):			
Permit Name:		Umbrella Point Gas Process Station	
D.	Is an acid rain permit application included? (YES, NO or N/A)	N/A	
E.	If an acid rain permit application has already been submitted, enter the application/permit number.		
F.	If an affected state review is required, list affected state(s) (AR, CO, KS, LA, NM, OK or N/A). N/A		
G.*	Is this submittal an abbreviated application or a full application?		
(Place an "X" in the appropriate box.)		Abbreviated	Full
		XX	
H.*	If a full SOP/TOP application, is this submittal a follow-up to an abbreviated application? (YES, NO or N/A)		

VII. SITE INFORMATION			
A.* Site Name: Umbrella Point Gas Process Station			
B. Street Address/Physical Location: 973A Point Barrow Road. / Trinity Bay			
C. Nearest City:	D. County:	E. Zip Code:	F. Primary SIC:
Baytown	Chambers	77520	1300
G. Latitude†:	H. Longitude†:	† Must be to the nearest second	
I. UTM Zone:	J. UTM East (Meters):	K. UTM North (Meters):	

VIII. RESPONSIBLE OFFICIAL OR DESIGNATED REPRESENTATIVE IDENTIFYING INFORMATION			
A. Responsible Official (RO)/Designated Representative (DR) Name: Barry Quackenbush			
B. RO/DR Title: Vice President for Marketing			
C. Company Name: Vintage Petroleum			
D. Telephone: (918) 592-0101		E. Fax:(918) 584-7282	
F. Mailing Address: 4200 One Williams Center			
City: Tulsa		State: OK	Zip Code: 74172

Note: All items must be completed for the initial application submittal. Only information indicated by the "" is required for subsequent submittals (including full application submittal follow-up to an abbreviated application). Other information must be completed for subsequent submittals only if it varies from the most recent submittal.*

Texas Natural Resource Conservation Commission
Form OP-1
Initial Application (Page 3)
Texas Federal Operating Permit



IX. TECHNICAL CONTACT IDENTIFYING INFORMATION (If Different From RO Or DR Information)

A. Technical Contact Name: James E. Miller

B. Technical Contact Title: Environmental Compliance Specialist

C. Company Name: Vintage Petroleum Company

D. Telephone: (918) 592-0101 E. Fax:

F. Mailing Address: 4200 One Williams Center

City: Tulsa State: OK Zip Code: 74172

G. Delivery Address: SAME

City: State: Zip Code:

X. SITE EMISSION UNITS AND MAJOR SOURCE POLLUTANTS

A. Number Of Emission Units In Application (Place an "X" in the appropriate box.)

<10	11-50	XX	51-100	101-250	251-500	>500
-----	-------	----	--------	---------	---------	------

B. Indicate All Air Pollutants For Which The Site's Potential To Emit Is Major:

Pollutant	CO	Nox (Ozone)	VOC (Ozone)	SO2	PM10	Pb	§112HAPS	Other
Major Source Threshold (tpy)	100	Varies**	Varies**	100	100	100	10/25	100
Major At The Site (YES/NO)	NO	NO	NO	NO	NO	NO	NO/NO	NO

** Major source threshold level depends on location (county) of the site. See applicable guidance document for more information.

XI. REFERENCE ONLY REQUIREMENTS

A. Franchise Tax Certificate Submitted*: (YES, NO or N/A) N/A

B. State Comptroller's Tax ID No.: Federal Tax ID Number 73-118-2669

C. State Senator: Unknown

D. State Representative: Unknown

* Submit a certification of good standing from the State Comptroller's Office if the permit is to be issued to a corporation. If not a corporation, see the application instructions for further information.

E. Estimated net number of new jobs that will be created in the community as a result of the operation of the site authorized by the permit requested under this application.

F. Total proposed number of interim program SOPs and/or TOPs for the company. 6

G. Total proposed number of interim program GOPs for the company. None

XII. FEE INFORMATION

Has the applicant paid emissions fees for the most recent agency fiscal year, (September 1 - August 31)? (YES/NO) NO



Form OP-CRO2 Change of Responsible Official Information Federal Operating Permit Program

The Texas Natural Resource Conservation Commission (TNRCC) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification. (A revised Certificate of Representation must also be submitted to the U.S. Environmental Protection Agency for changes in the DR and ADR.) After the initial submittal, if there is a change of Duty Authorized Representative (DAR) appointment or an administrative information change for the DAR, include a revised Form OP-DEL with the next submittal to the TNRCC.

I. IDENTIFYING INFORMATION		
A. Account No: CI-0058C	B. Permit No.:	C. Project No.:
D. Area Name: Trinity Bay/Galveston Bay		
E. Company Name: Vintage Petroleum		

II. CHANGE TYPES			
A. Action Type:	New Appointment	<input checked="" type="checkbox"/>	Administrative Information Change
B. Contact Type (Only one response can be accepted per form)			
Responsible Official	<input checked="" type="checkbox"/>	Designated Representative	Alternate Designated Representative

III. RESPONSIBLE OFFICIAL/DESIGNATED REPRESENTATIVE/ALTERNATE DESIGNATED REPRESENTATIVE INFORMATION		
A. Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr) Hung Nguyen		
B. Title: Production Manager - Gulf Coast	C. Effective Date: March 1, 1998	
D. Telephone: (918) 592-0101	E. Fax:	
F. Company Name: Vintage Petroleum, Inc.		
G. Mailing Address: 4200 One Williams Center		
City: Tulsa	State: OK	Zip Code: 74172
H. Delivery Address: 4200 One Williams Center		
City: Tulsa	State: OK	Zip Code: 74172

IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS	
This certification does not extend to information which is designated by the TNRCC as information for reference only.	
I. <u>Hung Nguyen</u> , certify that, based on information and belief formed after reasonable inquiry, the statements and information stated above are true, accurate, and complete.	
Signature: <u></u>	Signature Date: <u>6/23/98</u>
Title: <u>Production Manager - Gulf Coast</u>	

* If this RO, DR, or ADR has certification authority on any additional account numbers or permit projects, please list them on the following page of this



**Texas Natural Resource Conservation Commission
Form OP-CRO1
Certification by Responsible Official
Texas Federal Operating Permit Application**

Any information for the application or any required compliance, monitoring, recordkeeping, testing, or reporting submittals to the Texas Natural Resource Conservation Commission (TNRCC) pursuant to TNRCC Regulation XII shall contain a certification of truth, accuracy, and completeness by a Responsible Official (RO), Duly Authorized Representative (DAR) or Designated Representative (DR) (Title IV acid rain sources only). The certification required shall state that, based upon information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The TNRCC shall be notified of the appointment of a new RO or of any change in RO through an administrative permit amendment using Form OP-CRO2. The TNRCC shall be notified of the appointment of a new DAR or of any change in DAR through an administrative permit amendment using Form OP-DEL. This standardized form shall be used for all required Federal Operating Permits Program certifications. (For more detailed information regarding RO certifications, see the TNRCC guidance document entitled "Responsible Official.")

I. IDENTIFYING INFORMATION	
A. Account No.:	B. Federal Operating Permit/Application No.:
C. Permit Name: <u>BARRY QUACKENBUSH</u>	
D. Applicant/Permittee: <u>VINTAGE PETROLEUM INCORPORATED</u>	
II. CERTIFICATION TYPE	
A. Responsible Official: <u>BARRY QUACKENBUSH, VICE PRESIDENT FOR MARKETING</u>	
B. Duly Authorized Representative: <u>JAMES E. MILLER</u>	
C. Designated Representative (<i>Title IV acid rain sources only</i>):	
III. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS	
I, <u>BARRY QUACKENBUSH</u> , certify that I am the Responsible Official or the Duly Authorized Representative and that, based on information and belief formed after reasonable inquiry, the statements and information attached or previously submitted and incorporated herein by reference. (Place an "X" in the appropriate box.)	
<input checked="" type="checkbox"/> Initial Permit Application	<input type="checkbox"/> Permit Revision/Renewal
<input type="checkbox"/> General Operating Permit Application	<input type="checkbox"/> Other
and dated <u>February 11, 1997</u> are true, accurate, and complete.	
Signature: <u><i>Barry Quackenbush</i></u>	Date: <u>2/27/97</u>
Title: <u>Vice President for Marketing</u>	

10

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 29, 1998

Mr. Barry Quackenbush
Vice President for Marketing
Vintage Petroleum
4200 One Williams Center
Tulsa, Oklahoma 74172

Re: Void (Administrative Review)
Federal Operating Permit Application
Project Number: 352
Vintage Petroleum
Umbrella Point Gas Process Station
Baytown, Chambers County
Account Number: none

Dear Mr. Quackenbush:

Upon evaluation of the above-referenced Federal Operating Permit application, we have determined that we cannot accept this application because the application materials indicate that the area addressed by the application is not a major source as defined in Title 30 Texas Administrative Code § 122.120 (30 TAC § 122.120).

We recommend that documentation be maintained which supports the representation that the area is not subject to the requirements of 30 TAC Chapter 122. If, based on the documentation, it is later determined by either the company or the Texas Natural Resource Conservation Commission (TNRCC) that the site was subject to 30 TAC Chapter 122, the company may be subject to enforcement action. In any event, the company would have to submit an application for an operating permit in accordance with 30 TAC § 122.120 (Applicability), and 30 TAC § 122.130 (Responsibility to Apply).

If the area becomes subject to the requirements of 30 TAC Chapter 122 in the future, the owner or operator must submit the appropriate application for an operating permit at that time.

Please refer to the TNRCC document entitled "Federal Operating Permit Application Guidance Document" for additional information concerning application submittal criteria and procedures.

Mr. Barry Quackenbush
Page 2
July 29, 1998

If you have questions concerning this notice or if our evaluation is incorrect, please contact Mr. Cody Johnson at (512) 239-3173.

Sincerely,



Henry "Hank" M. Curry, P.E., Section Manager
Technical Operating Permit Support
Operating Permits Division (MC 163)
Texas Natural Resource Conservation Commission

HMC/CMJ/kjw

cc: Mr. James E. Miller, Environmental Compliance Specialist, Vintage Petroleum Company,
Tulsa, Oklahoma
Mr. Warren D. Graef, Consultant, Universal Safety Consultants, Houston

bcc: Ms. Orbie S. Ratcliff, Air Program Manager, Region 12-Houston
File Copy