



April 23, 2026

Ms. Necy Sumait
Regional Supervisor Office of Strategy Resources
Bureau of Ocean Energy Management
Pacific OCS Region
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

Subject: Platform Gilda Development and Production Plan Update: Hydraulic Fracturing
Ventura County Air Pollution Control District: Comments and Recommendations

Dear Ms. Sumait,

The Ventura County Air Pollution Control District (VCAPCD or District) is providing its “comments and recommendations” for the subject Platform Gilda hydraulic fracturing proposal that was deemed “submitted” by the Bureau of Ocean Energy Management (BOEM) on February 24, 2026.

The District’s role is limited to evaluating compliance with applicable federal and local VCAPCD air quality regulations, including permitting requirements under 40 CFR Part 55 and District rules. Platform Gilda operates under VCAPCD Permit to Operate No. 01492 pursuant to VCAPCD Rule 10, “Permits Required,” VCAPCD Rule 33, “Part 70 Permits,” and 40 CFR Part 55, “Outer Continental Shelf Regulations.” This permit regulates equipment such as flares, process heaters, oil production and processing tanks, and engines. The permit also places emission limitations on vessels servicing Platform Gilda including the usage of crew boats, supply boats, and designated specialty vessels for oil well drilling, maintenance, and well stimulation.

VCAPCD has reviewed the subject document and provides the following comments and recommendations:

1. Pursuant to 40 CFR Part 55.4, “Requirements to Submit a Notice of Intent,” the Platform Gilda hydraulic fracturing proposal is considered to be a physical change or change in method of operation that will result in an increase in emissions. As such, 40 CFR Part 55.4 requires the submittal of a Notice of Intent to VCAPCD that includes all of the information and elements specified in 40 CFR Part 55.4(b). The Notice of Intent shall be submitted not more than 18 months prior to submitting an application for the preconstruction permit required by VCAPCD Rule 10, “Permits Required.”
2. The Platform Gilda hydraulic fracturing activities will require an Authority to Construct and/or a Permit to Operate application pursuant to VCAPCD Rule 10, “Permits Required.” Any physical change or change in method of operation shall not commence until all required permits are obtained from VCAPCD. The permit application shall include all the

information required by the Notice of Intent above and any additional information and/or application forms required by VCAPCD Rule 12-Applications for permits.

The applicant must quantify all emissions associated with the proposed activities, including criteria pollutants and their precursors, from all sources such as portable equipment, support vessels, and associated operations. The equipment to be permitted for the hydraulic fracturing proposal, including portable diesel engines used for pumping and blending hydraulic fracturing fluids are subject to all VCAPCD rules. This includes, but is not limited to, the Best Available Control Technology (BACT) and emission offset requirements of VCAPCD Rule 26.2, "New Source Review – Requirements." Note that any diesel engines registered with the California Air Resources Board Portable Equipment Registration Program (PERP) must obtain a VCAPCD permit as PERP registrations are not valid on offshore oil platforms off the coast of Ventura County.

3. Modifications to Platform Gilda associated with the proposed project may require revision to the existing Part 70 (Title V) Permit pursuant to VCAPCD Rule 33. This includes an evaluation of whether the proposed changes constitute a significant modification under applicable federal and District regulations.

Thank you for the opportunity to comment on this proposed hydraulic fracturing project. Contact Ali Ghasemi, Air Pollution Control Officer, at aghasemi@vcapcd.org (805-303-4016) or Charanya Varadarajan, VCAPCD Engineering Division Manager, at charanya@vcapcd.org (805-303-3981) if you have any questions or wish to discuss these comments and recommendations in further detail.

Sincerely,



Ali R. Ghasemi
Air Pollution Control Officer

Cc:

Chima Ojukwu, Supervisor, Lease Management Section, Office of Strategic Resources, BOEM
Charanya Varadarajan, Division Manager, Engineering, charanya@vcapcd.org
John Harader, Permitting Supervisor, Engineering, johnh@vcapcd.org