



July 5, 2016

James Duffy
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Mr. Duffy,

Seneca Resources Corporation ("Seneca") is pleased to provide you with the attached application ("Application") for the Low Carbon Fuel Standard ("LCFS") "Innovative Method" for crude oil producers credit program. Seneca has retained BAP Power Corporation dba Cenergy Power ("Cenergy") to build and provide operation services for a 3.13 MW DC/ 2.5 MW AC fixed tilt solar photovoltaic project ("Solar Project") located at the North Midway Sunset Oil Field in Kern County, California. Seneca is the owner of the Solar Project. As described in the Application, the Solar Project meets the requirements set forth in the LCFS regulations as an "innovative method" to produce crude oil.

Seneca understands and agrees to the following with respect to the attached Application:

1. That all information in the application not identified as confidential business information is subject to public disclosure pursuant to California Code of Regulations title 17, section 91000 through 91022 and the California Public Records Act (Government Code §§6250 et seq.) and the information claimed by Seneca to be confidential might later be disclosed under Section 91022 if the state board determines the information is subject to disclosure.
2. That the crude oil producer (Seneca) must register under Section 95483.1 as an opt-in regulated party to receive LCFS credit for an innovative method, and that if the crude oil producer (Seneca) does not register as an opt-in regulated party, credits from an approved innovative method may be claimed by California refinery(ies) that purchase crude produced from the innovative method.

Seneca attests to the veracity of the information in this Application and Seneca declares that the information submitted accurately represents the actual and/ or intended long term, steady-state operation of the Solar Project (innovative method).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Formica".

Jeff Formica

Vice President, EHSQ