ATTACHMENT 5

Variance Order 2021-04-M2 Monthly Updates

July 5, 2023

Santa Barbara County Air Pollution Control District Hearing Board

> 260 San Antonio Road, Suite A Santa Barbara, California 93110

Platform Houchin Variance Order 2021-04-M2 January 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M2, Beacon West Energy Group hereby submits the following information for Platform Houchin for January 2023:

- a. Install a crane capable of repairing the flare (APCD Device ID 111640), including any applicable District permitting requirements, by February 1, 2023: This increment of progress deadline was met on January 28, 2023.
- b. Inspect the flare (APCD Device ID 111640) boom by April 1, 2023. This increment of progress deadline is scheduled to be met.
- c. Initiate installation of gauges on the wells by April 1, 2023. This increment of progress deadline is scheduled to be met.
- **d.** Complete repairs of handrails and grating in the well bay by June 30, 2023. This increment of progress deadline is scheduled to be met.
- **e. Repair the flare by October 1, 2023.** This increment of progress deadline is scheduled to be met.
- f. Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- g. Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- h. Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- i. Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 2. **List of well bay fugitive leak repairs completed and date repaired.** See attached Appendix A.
- 3. **List of outstanding well bay fugitive leak repairs.** See attached Appendix A for fugitive leaks not repaired due to deteriorated status of the wells.
- 4. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are crew boat, deck drain sump tank, and settling sump tank.
- 5. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance. Repairs commenced on 7/5/22 and are ongoing but have remained very limited due to absence of platform crane. Ongoing preparation for kickoff of construction for major Level 1 scope now that South Crane went into is operation on January 28, 2023.
- 6. **Records for monthly fugitive leak surveys.** See Attachment A.

- 7. List of actions to be taken in the next month.
 - a. Kickoff demo of wellbay access platform, to facilitate installation of wellhead gauges
 - **b.** Kickoff Phase 2 Level 1 repairs
- 8. List of actions completed during the past month.
 - a. Completed installation of remanufactured Unit 500 crane
 - **b.** Rigdown and demobilize rental cranes
- 9. Current status of the crane(s).
 - **a. South crane:** South Crane installation was completed on January 28, 2023.
 - b. Portable crane. Portable crane is scheduled to be installed in Q2 2023.
 - c. Any additional crane units: N/A
- 10. **Current status of the Flare.** Ongoing planning for Q2 2023 inspection and subsequent repairs, which will commence once operational cranes are installed on the platform. Flare is scheduled to be operational by October 1, 2023 increment of progress deadline.
- 11. Dates, times and volume of gas vented through the flare header:

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	INDICATED FLARE
DAY	MMCF
1	0.0180
2	0.0170
3	0.0180
4	0.0180
5	0.0210
6	0.0220
7	0.0170
8	0.0230
9	0.0210
10	0.0230
11	0.0120
12	0.0190
13	0.0190
14	0.0200
15	0.0190
16	0.0180
17	0.0130
18	0.0120
19	0.0130
20	0.0190
21	0.0190
22	0.0140
23	0.0130
24	0.0180

25	0.0180
26	0.0190
27	0.0180
28	0.0190
29	0.0180
30	0.0180
31	0.0200
January	0.5560
Total	MMCF

- 12. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** 3476.83 lbs, 1.74 tons ROC. Also refer to Appendix A.
- 13. Status of the Appeal Resolution. Appeal Resolution is being monitored by ConocoPhillips.

Facility: Platform Houchin

January 2023

Area Surveyed	Date/Time	Leak Detect Method		
Well Bay	1/30/2023	Soap Solution		
Process Area	1/30/2023	Soap Solution		

Leak Summary

				Inspection	Repair	
Area	Equipment	Connection Type	Description	Date/Time	Date/Time	Description of Repair
Well Bay	B-1	Valve Packing	Master Gate Valve Stem	1/30/2023	*	None Attempted
Well Bay	B-11	Threaded Connection	2" nipple on Prod Casing, East	1/30/2023	*	None Attempted
Well Bay	B-33	Threaded Connection	1/2" plug on Flow Choke	1/30/2023	*	None Attempted
Well Bay	B-34	Valve Packing	Prod Casing Wing Valve Stem	1/30/2023	*	None Attempted
Well Bay	B-37	Clamp Packing	Rod Lock Clamp Stem, North	1/30/2023	*	None Attempted
Well Bay	B-39	Threaded Connection	Lockdown	1/30/2023	*	None Attempted
Well Bay	B-18	Threaded Connection	Zerk Fitting on Flow Choke	1/30/2023	*	None Attempted

Platform Houchin Variance Order 2021-04-M2 February 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M2, Beacon West Energy Group hereby submits the following information for Platform Houchin for February 2023:

- a. Install a crane capable of repairing the flare (APCD Device ID 111640), including any applicable District permitting requirements, by February 1, 2023: This increment of progress deadline was met on January 28, 2023.
- b. Inspect the flare (APCD Device ID 111640) boom by April 1, 2023. This increment of progress deadline is scheduled to be met.
- c. Initiate installation of gauges on the wells by April 1, 2023. This increment of progress deadline is scheduled to be met.
- **d.** Complete repairs of handrails and grating in the well bay by June 30, 2023. This increment of progress deadline is scheduled to be met.
- **e. Repair the flare by October 1, 2023.** This increment of progress deadline is scheduled to be met.
- f. Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- g. Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- h. Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- i. Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 2. **List of well bay fugitive leak repairs completed and date repaired.** See attached Appendix A.
- 3. **List of outstanding well bay fugitive leak repairs.** See attached Appendix A for fugitive leaks not repaired due to deteriorated status of the wells.
- 4. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are crew boat, deck drain sump tank, and settling sump tank.
- 5. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance. Repairs commenced on 7/5/22 and are ongoing but have remained very limited due to absence of platform crane. Ongoing preparation for kickoff of construction for major Level 1 scope now that South Crane went into is operation on January 28, 2023.
- 6. **Records for monthly fugitive leak surveys.** See Attachment A.

- 7. List of actions to be taken in the next month.
 - a. Continue work on Phase 2 Level 1 repairs
- 8. List of actions completed during the past month.
 - a. Completed demo of wellbay walkways/platforms
 - **b.** Kicked off work on Phase 2 Level 1 repairs
- 9. Current status of the crane(s).
 - a. South crane: South Crane installation was completed on January 28, 2023.
 - **b. Portable crane.** Portable crane is scheduled to be installed in July 2023.
 - c. Any additional crane units: N/A
- 10. **Current status of the Flare.** Ongoing planning for Q2 2023 inspection and subsequent repairs. Flare is scheduled to be operational by October 1, 2023 increment of progress deadline.
- 11. Dates, times and volume of gas vented through the flare header:

DAY	INDICATED FLARE MMCF
1	0.0190
2	0.0190
3	0.0190
4	0.0190
5	0.0190
6	0.0180
7	0.0180
8	0.0170
9	0.0200
10	0.0170
11	0.0200
12	0.0170
13	0.0180
14	0.0190
15	0.0190
16	0.0180
17	0.0190
18	0.0200
19	0.0180
20	0.0190
21	0.0190
22	0.0390
23	0.0190
24	0.0220
25	0.0160
26	0.0190

27	0.0150
28	0.0130
February	0.5340
Total	MMCF

Monthly excess emissions, if any, calculated in lbs and tons of ROCs: 3339.26 lbs, 1.67 tons ROC. Also refer to Appendix A.

12. Status of the Appeal Resolution. Appeal Resolution is being monitored by ConocoPhillips.

Facility: Platform Houchin

February 2023

Area Surveyed	Date/Time	Leak Detect Method		
Well Bay	2/27/2023	Soap Solution		
Process Area	2/27/2023	Soap Solution		

Leak Summary

				Inspection	Repair	
Area	Equipment	Connection Type	Description	Date/Time	Date/Time	Description of Repair
Well Bay	B-1	Valve Packing	Master Gate Valve Stem	2/27/2023	*	None Attempted
Well Bay	B-11	Threaded Connection	2" nipple on Prod Casing, East	2/27/2023	*	None Attempted
Well Bay	B-33	Threaded Connection	1/2" plug on Flow Choke	2/27/2023	*	None Attempted
Well Bay	B-35	Threaded Connection	B-Annulus east Bull Plug	2/27/2023	*	None Attempted
Well Bay	B-37	Clamp Packing	Rod Lock Clamp Stem, North	2/27/2023	*	None Attempted
Well Bay	B-39	Threaded Connection	Lockdown	2/27/2023	*	None Attempted
Well Bay	B-18	Threaded Connection	Zerk Fitting on Flow Choke	2/27/2023	*	None Attempted

Platform Houchin Variance Order 2021-04-M2 March 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M2, Beacon West Energy Group hereby submits the following information for Platform Houchin for March 2023:

- a. Install a crane capable of repairing the flare (APCD Device ID 111640), including any applicable District permitting requirements, by February 1, 2023: This increment of progress deadline was met on January 28, 2023.
- b. Inspect the flare (APCD Device ID 111640) boom by April 1, 2023. This increment of progress deadline is scheduled to be met.
- c. Initiate installation of gauges on the wells by April 1, 2023. Gauge installation commenced in March 2023.
- **d.** Complete repairs of handrails and grating in the well bay by June 30, 2023. This increment of progress deadline is scheduled to be met.
- **e. Repair the flare by October 1, 2023.** This increment of progress deadline is scheduled to be met.
- f. Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- g. Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- h. Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- i. Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 2. **List of well bay fugitive leak repairs completed and date repaired.** See attached Appendix A.
- 3. **List of outstanding well bay fugitive leak repairs.** See attached Appendix A for fugitive leaks not repaired due to deteriorated status of the wells.
- 4. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are crew boat, deck drain sump tank, and settling sump tank.
- 5. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance. Repairs commenced on 7/5/22 and are ongoing but have remained very limited due to absence of platform crane. Continued ongoing preparation for kickoff of construction for major Level 1 scope now that South Crane went into is operation on January 28, 2023.
- 6. **Records for monthly fugitive leak surveys.** See Attachment A.

- 7. List of actions to be taken in the next month.
 - a. Continue work on Phase 2 Level 1 repairs.
 - **b.** Continue gauge installation on wells.
 - c. Planning for repairs/modifications to flare piping.
- 8. List of actions completed during the past month.
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - **b.** Commenced gauge installation on wells.
 - **c.** Completed mechanical integrity inspection of flare scrubber and piping.
- 9. Current status of the crane(s).
 - a. South crane: South Crane installation was completed on January 28, 2023.
 - b. Portable crane. Portable crane is scheduled to be installed in July 2023.
 - c. Any additional crane units: N/A
- 10. **Current status of the Flare.** Ongoing planning for Q2 2023 inspection and subsequent repairs. Flare is scheduled to be operational by October 1, 2023 increment of progress deadline.
- 11. Dates, times and volume of gas vented through the flare header:

DAY	INDICATED FLARE MMCF
1	0.0130
2	0.0130
3	0.0140
4	0.0160
5	0.0130
6	0.0170
7	0.0190
8	0.0190
9	0.0200
10	0.0130
11	0.0200
12	0.0210
13	0.0150
14	0.0200
15	0.0190
16	0.0190
17	0.0190
18	0.0190
19	0.0190
20	0.0180
21	0.0400
22	0.0000
23	0.0350

24	0.0210
25	0.0180
26	0.0860
27	0.0620
28	0.0910
29	0.0650
30	0.0180
31	0.0230
March	0.8050
Total	MMCF

Monthly excess emissions, if any, calculated in lbs and tons of ROCs: 5033.91 lbs, 2.52 tons ROC. Also refer to Appendix A.

12. Status of the Appeal Resolution. Appeal Resolution is being monitored by ConocoPhillips.

ATTACHMENT A - MONTHLY FUGITIVE EMISSIONS MONITORING REPORT

Facility: Platform Hogan

March 2023

Area Surveyed	Date/Time	Leak Detect Method
Well Bay	3/26/2023	Soap Solution
Process Area	3/26/2023	Soap Solution

Leak Summary

Leak Summary				Inspection	Leak Rate	Repair	
Area	Equipment	Connection Type	Description	Date/Time	(PPM)	Date/Time	Description of Repair
Wellbay	A-49	Valve Stem	Master Valve	3/26/2023	N/A	N/A	None attempted
Wellbay	A-49	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-49	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-49	Threaded	A-Ann-2" Nipple	3/26/2023	N/A	3/26/2023	Tighten
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-40	Threaded	A-Ann2"B/V	3/26/2023	N/A	N/A	None attempted
Wellbay	A-43	Threaded	A-Ann1/2" Plug	3/26/2023	N/A	3/26/2023	Re-tape
Wellbay	A-27	Threaded	A-Ann 2" Nipple East-Side	3/26/2023	N/A	N/A	None attempted
Wellbay	A-27	Valve Stem	A-Ann Gate Valve Stem	3/26/2023	N/A	N/A	None attempted
Wellbay	A-26	Threaded	2" Bull Plug On TBG	3/26/2023	N/A	3/26/2023	Re-tape
Wellbay	A-26	Valve Stem	A-Ann Needle Valve	3/26/2023	N/A	3/26/2023	Tighten Packing nut

ATTACHMENT A - MONTHLY FUGITIVE EMISSIONS MONITORING REPORT

Facility: Platform Hogan

March 2023

Area Surveyed	Date/Time	Leak Detect Method
Well Bay	3/26/2023	Soap Solution
Process Area	3/26/2023	Soap Solution

Leak Summary

,				Inspection	Leak Rate	Repair	
Area	Equipment	Connection Type	Description	Date/Time	(PPM)	Date/Time	Description of Repair
Wellbay	A-23	Valve Stem	A-Ann Gate Valve Stem	3/26/2023	N/A	N/A	None attempted
Wellbay	A-11	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-11	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-11	Threaded	Lock Down Pin	3/26/2023	N/A	N/A	None attempted
Wellbay	A-4	Threaded	B-Ann Bull Plug East Side	3/26/2023	N/A	N/A	None attempted
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							
Wellbay							

Platform Houchin Variance Order 2021-04-M2 April 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M2, Beacon West Energy Group hereby submits the following information for Platform Houchin for April 2023:

- a. Install a crane capable of repairing the flare (APCD Device ID 111640), including any applicable District permitting requirements, by February 1, 2023: This increment of progress deadline was met on January 28, 2023.
- **b. Inspect the flare (APCD Device ID 111640) boom by April 1, 2023.** Inspection of the flare piping was completed March 31, 2023.
- c. Initiate installation of gauges on the wells by April 1, 2023. Gauge installation commenced in March 2023.
- **d.** Complete repairs of handrails and grating in the well bay by June 30, 2023. This increment of progress deadline is scheduled to be met.
- **e. Repair the flare by October 1, 2023.** This increment of progress deadline is scheduled to be met.
- f. Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- g. Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- h. Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- i. Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 2. **List of well bay fugitive leak repairs completed and date repaired.** See attached Appendix A.
- 3. **List of outstanding well bay fugitive leak repairs.** See attached Appendix A for fugitive leaks not repaired due to deteriorated status of the wells.
- 4. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are crew boat, deck drain sump tank, and settling sump tank.
- 5. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance. Repairs commenced on 7/5/22 and are ongoing. Replacement of deck plate and handrails on critical areas have been completed. Repair work will continue throughout the entire platform.
- 6. **Records for monthly fugitive leak surveys.** See Attachment A.

- 7. List of actions to be taken in the next month.
 - a. Continue work on Phase 2 Level 1 repairs.
 - **b.** Planning for repairs/modifications to flare piping.
- 8. List of actions completed during the past month.
 - **a.** Ongoing work on Phase 2 Level 1 repairs.
 - **b.** Completed gauge installation on wells.
 - c. Completed mechanical integrity inspection of flare scrubber and piping.
- 9. Current status of the crane(s).
 - a. South crane: South Crane installation was completed on January 28, 2023.
 - **b. Portable crane.** Portable crane is scheduled to be installed in August 2023.
 - c. Any additional crane units: N/A
- 10. **Current status of the Flare.** Commenced inspection of flare and planning subsequent repairs. Flare is scheduled to be operational by October 1, 2023 increment of progress deadline.
- 11. Dates, times and volume of gas vented through the flare header:

DAY	INDICATED FLARE MMCF
1	0.0210
2	0.0620
3	0.0410
4	0.0030
5	0.0050
6	0.0470
7	0.0230
8	0.0730
9	0.0250
10	0.0010
11	0.0010
12	0.0000
13	0.0010
14	0.0040
15	0.0050
16	0.0040
17	0.0060
18	0.0020
19	0.0020
20	0.0060
21	0.0040
22	0.0040
23	0.0050
24	0.0040

25	0.0010
26	0.0020
27	0.0000
28	0.0020
29	0.0030
30	0.0020
March	0.3590
Total	MMCF

Monthly excess emissions, if any, calculated in lbs and tons of ROCs: 2234.93 lbs, 0.65 tons ROC. Also refer to Appendix A.

12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Facility: Platform Houchin

April 2023

Area Surveyed	Date/Time	Leak Detect Method		
Well Bay	4/18/2023	Soap Solution		
Process Area	4/18/2023	Soap Solution		

Leak Summary

				Inspection	Repair	
Area	Equipment	Connection Type	Description	Date/Time	Date/Time	Description of Repair
Well Bay	B-39	threaded Connection	A casing 2" nipple/BV connection	4/18/2023	4/18/2023	tighten BV onto nipple with wrench.

Platform Houchin Variance Order 2021-04-M2 May 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M2, Beacon West Energy Group hereby submits the following information for Platform Houchin for May 2023:

- a. Install a crane capable of repairing the flare (APCD Device ID 111640), including any applicable District permitting requirements, by February 1, 2023: This increment of progress deadline was met on January 28, 2023.
- **b. Inspect the flare (APCD Device ID 111640) boom by April 1, 2023.** Inspection of the flare piping was completed March 31, 2023.
- **c. Initiate installation of gauges on the wells by April 1, 2023.** Gauge installation was completed in April 2023.
- **d.** Complete repairs of handrails and grating in the well bay by June 30, 2023. This increment of progress deadline is scheduled to be met.
- **e. Repair the flare by October 1, 2023.** Per updated schedule, the flare is scheduled to be operational in June 2023.
- f. Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- g. Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- h. Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- i. Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 2. **List of well bay fugitive leak repairs completed and date repaired.** See attached Appendix A.
- 3. **List of outstanding well bay fugitive leak repairs.** See attached Appendix A for fugitive leaks not repaired due to deteriorated status of the wells.
- 4. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are crew boat, deck drain sump tank, and settling sump tank.
- 5. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance. Repairs commenced on 7/5/22 and are ongoing. Replacement of deck plate and handrails on critical areas have been completed. Repair work will continue throughout the entire platform.
- 6. **Records for monthly fugitive leak surveys.** See Attachment A.

- 7. List of actions to be taken in the next month.
 - a. Continue work on Phase 2 Level 1 repairs.
 - **b.** Planning for repairs/modifications to flare piping.
 - **c.** Continue with piperack deck structural reinforcement to support portable crane installation/operations
- 8. List of actions completed during the past month.
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - **b.** Prep work for piperack deck structural reinforcement to support portable crane installation/operations
- 9. Current status of the crane(s).
 - **a. South crane:** South Crane installation was completed on January 28, 2023.
 - **b. Portable crane.** Portable crane is scheduled to be installed in August 2023.
 - c. Any additional crane units: N/A
- 10. **Current status of the Flare.** Continued inspection of flare and planning for repairs. Flare is scheduled to be operational in June 2023 deadline.
- 11. Dates, times and volume of gas vented through the flare header: No gas vented through flare header in May 2023.
- 12. Monthly excess emissions, if any, calculated in lbs and tons of ROCs: No excess emissions through flare stack in May 2023.
- 13. Status of the Appeal Resolution. Appeal Resolution is being monitored by ConocoPhillips.

Facility: Platform Houchin

May 2023

Area Surveyed	Date/Time	Leak Detect Method
Well Bay	5/27/2023	Soap Solution
Process Area	5/27/2023	Soap Solution

Leak Summary

,				Inspection	Repair	
Area	Equipment	Connection Type	Description	Date/Time	Date/Time	Description of Repair
Well Bay	B-39	threaded Connection	Hanger pin N side marked red	5/27/2023		None attempted.