

ATTACHMENT 6

Variance Order 2021-04-M3 Monthly Updates

July 3, 2024

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-M3
July 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for July 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A.
4. **Status of ongoing safety repairs to the platform.** Continue with implementation of Level 1 repairs (deck plate replacement, hand rails, access stair mods, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Continue with prep work for site installation of piperack deck structural reinforcement to support portable crane installation/operations.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.
 - b. Obtain AFE approval and kickoff work on proposed modifications to flare piping.
 - c. Complete site installation for the piperack deck structural reinforcement to support portable crane installation/operations.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, crew boat, deck drain sump tank, and settling sump tank.

9. **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.
10. **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 September 2023.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in July 2023.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Reading Log

Date 7.19.23

Client Beacon West Energy Group Date _____
 Facility Platform Houchin Contact _____
 Rule 331 Permit None Office _____
 Work Order _____ Type Call Out Call _____
 Inspector Kim DeAngelis Travel _____ Lunch 1
 TVA 2020-04 Repair _____
 Start 6:30AM Reinspection _____
 End 2:15 PM Page 1 of 3

Old
leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	Above ground E	Nipple	2	TC	7:25 AM	91,500				

Description : Leak at threaded connection

new
leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	Above ground E	Hanger Pin	1	TC	7:30 AM	91,800				

Description : Leak at threaded connection.

old
leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	Above ground E	Hanger Pin	1	TC	7:57 AM	44,900				

Description : Leak at threaded connection.

Old
leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	Above ground W Gate	Valve Stem	2	Valve Stem	8:03 AM	21,600				

Description : Leak at valve stem.

Repaired
Leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-1	Above ground W	Gauge	1	TC	8:15 AM	28,500				

Description : Leak at threaded connection.

Reading Log

Date 7.19.23

Client Beacon West Energy Group Date _____ Inspector Kim DeAngelis Travel _____ Lunch 1
 Facility Platform Houchin Contact _____
 Rule 331 Permit None Office _____
 Work Order _____ Type Call Out Cell _____
 TVA 2020-04 Repair _____
 Start 6:30 AM Reinspection _____
 End 2:15 PM Page 2 of 3

Repaired

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-11	Above ground W	Gaug	1	TC	8:20 AM	93700				

Description : Leak at threaded connection.

Old leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground SE	Hanger Pin	1	TC	8:36 AM	94100				

Description : Leak at threaded connection.

Old leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground N	Gate Valve	2	Valve Stem	8:43 AM	22300				

Description : Leak at valve stem

New leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	Above ground N	Gate Valve	2	Valve Stem	9:00 AM	94800				

Description : Leak at valve stem

Old leak

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	Above ground W	Needle Valve	1	Valve Stem	9:04 AM	94900				

Description : Leak at threaded connection, valve stem nut.

Reading Log

Date 7.19.23

Client Beacon West Energy Group Gate _____ Inspector Kim DeAngelis Travel _____ Lunch 1
 Facility Platform Houchin Contact _____ TVA 2020-04 Repair _____
 Rule 331 Permit None Office _____ Start 6:30 AM Reinspection _____
 Work Order _____ Type Call Out Cell _____ End 2:15 PM Page 3 of 3

Repaired

Metal Tag	Green Tag Number	Area	Subarea	Location	Component Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	Above ground	Gauge 1	TC	9:47 AM	95600				
Description : Leak at threaded connection.												

Repaired

Metal Tag	Green Tag Number	Area	Subarea	Location	Component Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	Above ground	Reducer 2	TC	9:50 AM	77,400				
Description : Leak at threaded connection.												

Old

Metal Tag	Green Tag Number	Area	Subarea	Location	Component Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	Above ground	SM Gate Valve 2	Valve Stem	10:20 AM	96,000				
Description : Leak at valve stem.												

Old

Metal Tag	Green Tag Number	Area	Subarea	Location	Component Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-34	Over head	BOP 1	TC	12:09 PM	12,400				
Description : Leak at threaded connection of BOP (RAM).												

Metal Tag	Green Tag Number	Area	Subarea	Location	Component Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :												

Platform Houchin
Variance Order 2021-04-M3
August 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for August 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in July 2023 update for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in July 2023 update.
4. **Status of ongoing safety repairs to the platform.** Continue with implementation of Level 1 repairs (deck plate replacement, hand rails, access stair mods, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in July 2023 update.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Ongoing piperack deck structural reinforcement to support portable crane installation/operations.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.
 - b. Obtain AFE approval and kickoff work on proposed modifications to flare piping.
 - c. Complete piperack deck structural reinforcement to support portable crane installation/operations.
 - d. Complete detailed engineering of proposed skid rails on the piperack deck. This will need to be completed to install the portable crane

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, crew boat, deck drain sump tank, and settling sump tank.
9. **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.
10. **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 January 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in August 2023.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Houchin
Variance Order 2021-04-M3
September 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for September 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023. Next Method 21 inspection will occur in October 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in “Repair Type” column of Attachment A in July 2023 update for components with completed repairs. Next Method 21 inspection will occur in October 2023.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in July 2023 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Continue with planning and implementation of remaining Level 1 repairs (access stair mods, access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in July 2023 update. Next Method 21 inspection will occur in October 2023.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Ongoing piperack deck structural reinforcement to support portable crane installation/operations. Current progress is ~50%, working on procurement of additional structural steel materials
 - c. Ongoing installation of proposed modifications to flare piping
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.
 - b. Complete installation of modifications to flare piping.

- c. Continue with piperack deck structural reinforcement to support portable crane installation/operations.
 - d. Complete detailed engineering of proposed skid rails on the piperack deck. This will need to be completed to install the portable crane
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, crew boat, deck drain sump tank, and settling sump tank.
- 9. **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.
- 10. **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 January 2024.
 - c. **Any additional crane units:** N/A
- 11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in September 2023.
- 12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Houchin
Variance Order 2021-04-M3
October 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for October 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023. Next quarterly Method 21 inspection will occur in November 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in July 2023 update for components with completed repairs. Next Method 21 inspection will occur in November 2023.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in July 2023 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Ongoing access stairs mods. Continue with planning and implementation of remaining Level 1 repairs (access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in July 2023 update. Next Method 21 inspection will occur in November 2023.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Ongoing piperack deck structural reinforcement to support portable crane installation/operations. Current progress is ~50%. Completed procurement of additional structural steel materials.
 - c. Completed installation of proposed modifications to flare piping
 - d. Completed detailed design and procurement for proposed skid rails on the piperack deck

7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.
 - b. Continue with piperack deck structural reinforcement to support portable crane installation/operations.
 - c. Start site installation of proposed skid rails on the piperack deck. This will need to be completed to install the portable crane
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **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.
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installation was completed on January 28, 2023.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed On Platform Hogan in October 2023 and will be moved to Platform Houchin in early 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in October 2023.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Houchin
Variance Order 2021-04-M3
November 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for November 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in November 2023 update for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in November 2023 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once Nautilus 280B crane is in service. Continue with planning and implementation of remaining Level 1 repairs (access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in November 2023 update.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Ongoing piperack deck structural reinforcement to support portable crane installation/operations. Current progress is ~50%. Completed procurement of additional structural steel materials. Kickoff construction.
 - c. Completed procurement for proposed skid rails on the piperack deck. Kicked-off construction
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.

- b. Continue with piperack deck structural reinforcement to support portable crane installation/operations.
 - c. Continue with site installation of proposed skid rails on the piperack deck. This will need to be completed to install the portable crane
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
- 9. **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.
- 10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installation was completed on January 28, 2023.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed On Platform Hogan in October 2023 and will be moved to Platform Houchin in early 2024.
 - c. **Any additional crane units:** N/A
- 11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in November 2023.
- 12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Client Beacon West
 Facility Platform Touchin
 Rule 331 Variance Inspection Permit None
 Work Order 114771 Type Quarterly
 Gate _____
 Contact Doug Taylor
 Office _____
 Cell 805 455 9650

Reading Log

Inspector Valeria Cardona
 TVA 2020-74
 Start 6:15 am
 End _____

Date 11/29/23
 Travel _____ Lunch .5
 Repair _____
 Reinspection _____
 Page 1 of 2

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGE	nipple		TC		70500				
Description: <u>leaking at threaded connection on Above Ground East nipple</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	bottom row, ram 3 AGESE	Ram		TC		3549				
Description: <u>leaking at threaded connection at Above ground center south east, bottom row, ram 3</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGECNW, top row ram 4	Ram		TC		80500				
Description: <u>leaking at threaded connection on Above ground center North West, top row, ram 4</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-31	AGECNW, top row ram 4	Ram		TC		81800				
Description: <u>leaking at threaded connection on Above ground center North West, top row, ram 4</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	AGE SW	gate valve		VS		11300				
Description: <u>leaking at valve stem on Above ground south west gate valve</u>													

Reading Log

Client Beacon West
 Facility Platform Hoarding
 Rule 331 Variance Inspection Permit None
 Work Order 11471 Type Quarterly

Gate _____
 Contact Doug Taylor
 Office _____
 Cell 805 455 9650

Inspector Valeria Cardona
 TVA 2020 74
 Start 6:15 AM
 End _____

Date 11/29/23
 Travel _____ Lunch .5
 Repair _____
 Reinspection _____
 Page 2 of 2

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		<u>Wall Bays</u>	<u>B-34</u>	<u>OCN</u>	<u>Rain</u>		<u>TU</u>		<u>4104</u>				
Description: <u>Leaking at Overhead center North Vain</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Date 11/29/23

Travel Lunch

Repair

Reinspection

Page 1 of 2

Reading Log

Inspector Denise Casares

TVA 2020-23

Start 6:15am

End

Client Beacon West

Facility Platform Houdin

Rule 331 Variance Inspection Permit None

Work Order 11471 Type Quarterly

Gate

Contact Doug Taylor

Office

Cell 805 455 9650

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Overhead Center North	gate valve		Value stem		25200				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground center North	ram		thread conn.		3693				

Description : leak above ground center north bottom row ram 3

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground Center	wellhead clamp		Clamp		3873				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground west	gate valve		Value stem		8100				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	Above ground Center South top row	ram		thread connection		80900				

Description :

Date 11/29/23
 Travel _____ Lunch _____
 Repair .25
 Reinspection .25
 Page 2 of 2

Reading Log

Client Beacon West
 Facility Platform Houdin
 Rule 331 Variance Inspection Permit None
 Work Order 114771 Type Quarterly

Gate _____
 Contact Doug Taylor
 Office _____
 Cell 805 455 9650

Inspector Denise Casares
 TVA 2020-73
 Start 6:15am
 End _____

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-11	Above ground west	Ball Valve		thread connection		35900	T1		1.53	

Description: leak was repaired by tightening at threaded connection

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-15	Above ground center west top row ram 2	ram		thread connection		48100				

Description: _____

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	Overhead center north	gate valve		valve stem		83100				

Description: _____

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	Above ground west	tube fitting		thread connection		80100				

Description: _____

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	Above ground west	gauge		thread connection		81800	T1		2.3	

Description: leak was repaired by tightening at threaded connection

Platform Houchin
Variance Order 2021-04-M3
December 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for December 2023:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in November 2023 update for components with completed repairs. Next Method 21 inspection will occur in February 2024.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in November 2023 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once Nautilus 280B crane is in service. Continue with planning and implementation of remaining Level 1 repairs (access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in November 2023 update. Next Method 21 inspection will occur in February 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Ongoing piperack deck structural reinforcement to support portable crane installation/operations. Current progress is ~50%. Waiting for completion of skid rails installation to kickoff construction.
 - c. Ongoing installation of skid rails on the piperack deck.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.

- b. Continue with piperack deck structural reinforcement to support portable crane installation/operations.
 - c. Complete site installation of proposed skid rails on the piperack deck. This will need to be completed to install the portable crane
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
- 9. **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.
- 10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installation was completed on January 28, 2023.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed On Platform Hogan in October 2023 and will be moved to Platform Houchin in early 2024.
 - c. **Any additional crane units:** N/A
- 11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in November 2023.
- 12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Houchin
Variance Order 2021-04-M3
January 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for January 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in November 2023 update for components with completed repairs. Next Method 21 inspection will occur in February 2024.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in November 2023 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once Nautilus 280B crane is in service. Continue with planning and implementation of remaining Level 1 repairs (access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A in November 2023 update. Next Method 21 inspection will occur in February 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Completed piperack deck structural reinforcements to support portable crane installation/operations.
 - c. Ongoing installation of skid rails on the piperack deck.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.

Platform Houchin
Variance Order 2021-04-M3
February 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for February 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once Nautilus 280B crane is in service. Continue with planning and implementation of remaining Level 1 Phase 2 repairs (access hatches replacement, etc.).
5. **Records for monthly fugitive leak surveys.** See Attachment A. Next Method 21 inspection will occur in May 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
 - b. Completed pipe rack deck structural reinforcements to support portable crane installation/operations.
 - c. Completed installation of skid rails on the pipe rack deck.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **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.
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installation was completed on January 28, 2023.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed on Platform Hogan in October 2023 and will be moved to Platform Houchin in Q2 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in February 2024.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A - Quarterly Variance Inspection - Platform Houchin

Reading Log

Client Beacon West Energy Group Gate N/A Inspector Carlos Mendora Date 02/23/24
 Facility Platform Houchin Contact Paig Taylor TVA 2020-30 Travel Lunch 0.5
 Rule 331 Permit None Office Paig.Taylor@beacon-west.com Start 3:45 Repair
 Work Order 116298 Type Preventative Maintenance Cell (805) 455-9650 End Reinspection
 Page 3 of 3

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	OCN	Valve	4"	Packing	4:53	2020				
Description: Valve packing overhead center North													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-8	AGCN	FL		FL	7:57	16500				
Description: Well Flange above ground center North (New Leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-3	AGCN	FL		FL	8:11	17646				
Description: Well flange above ground center North (New Leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-3	AGCN	RAM		TC	8:19	1302				
Description: RAM 2 Top row above ground center North (New Leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description:													

Client Beacon West Energy Group Gate N/A Inspector Carlos Mendez Date 02/23/2024
 Facility Platform Hoachine Contact Doug Taylor TVA 2020-30 Travel Lunch
 Rule 331 Permit None Office Doug.Taylor@beacon-west.com Start Repair
 Work Order 116298 Type Preventative Maintenance Cell (805) 455-9650 End Reinspection Page 2 of 3

Reading Log

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	AGCW	Valve 2"		Packing	7:05 AM	1594				
Description: <u>Valve packing above ground center West (new leak)</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	AGCN	RAM		TC	7:08	17500				
Description: <u>RAM 1 top row above ground center north</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	AGCN	RAM		TC	7:09	100000				
Description: <u>RAM 2 top row above ground center north (new leak)</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	OGCN	Valve 4"		Packing	7:11	8561				
Description: <u>Valve packing above ground center north</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGCW	Valve 2"		Packing	7:15	9871				
Description: <u>Valve packing above ground center west</u>													

Client Beacon West Energy Group Gate N/A Reading Log Inspector Carlos Mendez Date 02/23/2024
 Facility Platform Hoisting Contact Doug Taylor TVA 2020-30 Travel Lunch
 Rule 331 Permit None PM Office Doug.Taylor@beaconwest.com Start Repair
 Work Order 116298 Type Preventative Maint Cell (805) 455-9650 End Reinspection
 Page 1 of 3

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGCE	Niptex	TC	5:51	14000					
Description: Leaking from 2" TC on the East side of the well casing (New Leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGCN Top Row	RAM		TC	5:55	14000				
Description: Leaking from Ram 1, top row, above ground center North													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGCN	RAM		TC	5:57	1405				
Description: Ram 2 bottom row above ground center north (new leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGCN	RAM		TC	5:59	5079				
Description: RAM 3 bottom row above ground center north (new leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGCN	RAM		TC	6:00	1099				
Description: Ram 4 bottom row above ground center north (new leak)													

Reading Log

Client Beacon West
 Facility Platform Houchin
 Rule 331 Permit None
 Work Order 116298 Type Quarterly

Gate _____
 Contact Doug Taylor
 Office _____
 Cell 805 455 9650

Inspector Denise Casares
 TVA 2020-73
 Start 4:00 am
 End _____

Date 2/23/24
 Travel _____ Lunch .5
 Repair _____
 Reinspection _____
 Page 1 of 1

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	Well B-34	Above ground center South	ram		Threaded Connection		10200				
Description: ram top row south leaking at threaded connection (new leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Platform Houchin
Variance Order 2021-04-M3
March 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for March 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in February 2024 update for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in February 2024 update.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once portable crane is moved to Houchin. Continue with planning and implementation of remaining Level 1 Phase 2 repairs (access hatches replacement, etc.). Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in February 2024 update. Next Method 21 inspection will occur in May 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Phase 2 Level 1 repairs.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Phase 2 Level 1 repairs. Kickoff construction for Houchin access hatches mods

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **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.
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installation was completed on January 28, 2023.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed on Platform Hogan in October 2023 and will be moved to Platform Houchin in Q2 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in March 2024.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Houchin
Variance Order 2021-04-M3
April 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for April 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A for components with completed repairs.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A.
4. **Status of ongoing safety repairs to the platform.** Completed all planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once portable crane is moved to Houchin. Continue with planning and implementation of remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Initiated fabrication for access hatches modification/replacement.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.

9. **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.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed on Platform Hogan in October 2023 and will be moved to Platform Houchin in Q2 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in April 2024.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Reading Log

Client Beacon West Energy Group
 Facility Platform Harkin
 Rule 331 Permit None
 Work Order 117924 Type Preventative Maintenance

Gate N/A Inspector Carlos Mendez
 Contact Doug Taylor TVA 2020-36
 Office Doug Taylor @ Beacon West.com Start 6:15 AM
 Cell (805)-455-9650 End 2:30 PM

Date 04/29/2024
 Travel _____ Lunch 0.5
 Repair _____
 Reinspection _____
 Page 1 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-34	AGCS	CLMP	16	FI	08:21	87000				
Description: <u>Leaking crown clamp on B-34 Above Grand Center South / 87000ppm (NEW)</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-37	AGW	G	1/2"	TC	08:39	19000	TI	N/A	421	08:57
Description: <u>1/2" Gauge Above Ground West off B-37 19000ppm (new Leak)</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-12	AGW	ROM	2	TC	08:54	1269	TC	N/A	68	08:59
Description: <u>2" Reducer Above ground west off B-12 1269ppm (new Leak)</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-3	AGCN	CLMP	16	TC	09:13	14000				
Description: <u>Crown clamp on B-3 Above ground center north 14000ppm</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-3	AGCN	RAM	1"	FI	9:15	9781				
Description: <u>1" RAM above ground north 2nd RAM west to east top row 9781ppm</u>													

Reading Log

Date 04/29/2024
 Travel _____ Lunch 0.5
 Repair _____
 Reinspection _____
 Page 2 of 4

Client Beacon West Energy Group
 Facility Platform Harkin
 Rule 331 Permit None
 Work Order 117924 Type Preventative Maintenance

Gate N/A Inspector Carlos Mendez
 Contact Doug Taylor TVA 242036
 Office Doug Taylor@BeaconWest.com Start 6:15 AM
 Cell (802) 455-9650 End 2:30 PM

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-3	AGN	RAM	1"	FI	09:17	2305				
Description: 1" RAM above ground north 1st RAM west to east top row 2305ppm (new leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGNES	RAM	1"	FI	09:41	9468				
Description: 1" Ram above ground north south 1st ram east to west top row 9468ppm													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGW	VPLG	2"	STM	09:46	10600				
Description: 2" Plug valve above ground West leaking from the stem 10600ppm													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGE	F	4"	FI	09:51	1746				
Description: 4" Flange above ground East 1746ppm (new leak)													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-39	AGN	RAM	1"	FI	10:21	100000				
Description: 1/2" RAM above ground north 1st ram west to east 100,000ppm													

Reading Log

Client Beacon West Energy Group
 Facility Platform Hachin
 Rule 331 Permit None
 Work Order 117924 Type Preventative Maintenance

Gate N/A
 Contact Doug Taylor
 Office Doug Taylor @ Beacon
 Cell (805) 455-9650
 Inspector Carlos Mendoza
 TVA 2020-36
 Start 6:15 AM
 End 2:30 PM

Date 04/29/2024
 Travel _____ Lunch 0.5
 Repair _____
 Reinspection _____
 Page 3 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-39	AGN	RAM	1"	FI	10:23	100000				
Description: 1" RAM above ground north 2 ND ram west to east 100,000ppm TOP ROW													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL RAM	B-39	AGN	RAM	1"	FI	10:28	1287				
Description: 1" RAM above ground north 4 TH ram west to east 1287ppm (NEW LEAK) TOP ROW													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-46	AGN	RAM	1"	FI	11:32	26000				
Description: 1" RAM above ground north 1 ST ram west to east 26000ppm TOP ROW													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-46	AGN	RAM	1"	FI	11:37	5470				
Description: 1" RAM above ground north 2 ND ram west to east BOTTOM ROW 5470ppm													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		WELL BAY	B-46	AGN	RAM	1"	FI	11:41	2195				
Description: 1" RAM above ground north 3 RD ram west to east bottom row 2195ppm													

Reading Log

Client Beacon West Energy Group
 Facility Platform Hachin
 Rule 331 Permit None
 Work Order 117929 Type Preventative Maintenance

Gate _____
 Contact Doug Taylor
 Office Doug Taylor @ Beacon West.com
 Cell (805) 455-9650

Inspector Carlos Mendez
 TVA 2020-36
 Start 6:15 AM
 End 2:30 PM

Date 04/29/2024
 Travel _____ Lunch 0.5
 Repair _____
 Reinspection _____
 Page 4 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGN	RAM	1"	FI	11:45	3720				
Description: 1" RAM above ground north 4th ram west to east bottom row 3720ppm													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-46	AGE	COC	2"	FI	11:49	39000				
Description: 2" Coupling Above ground East 39000ppm													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Description :													

Platform Houchin
Variance Order 2021-04-M3
May 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-04-M3, Beacon West Energy Group hereby submits the following information for Platform Houchin for May 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **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.
 - c. **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.
 - d. **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.
 - e. **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 entries in "Repair Type" column of Attachment A in April 2024 update for components with completed repairs. Next Method 21 inspection will occur in July 2024.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in April 2024 update.
4. **Status of ongoing safety repairs to the platform.** Completed planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once portable crane is moved to Houchin. Continue with planning and implementation of remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in April 2024 update. Next Method 21 inspection will occur in July 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Ongoing fabrication for access hatches modification/replacement. Est. completion July 2024.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **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.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was installed on Platform Hogan in October 2023 and will be moved to Platform Houchin in Q3 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in May 2024. Excess well head fugitive emissions identified by Method 21 screening are not calculated.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.