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.

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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.

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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.

- **b.** 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 January 2024.
- 12. Status of the Appeal Resolution. Appeal Resolution is being monitored by ConocoPhillips.

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

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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.

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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.