ATTACHMENT 6

Variance Order 2021-05-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 Hogan Variance Order 2021-05-M3 July 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for July 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.** All necessary Level 1 repairs are completed, and firewater system repairs are ongoing
- 5. Fugitive emissions inspection log records specified in District Rule 331.G.4. See Attachment A.
- 6. List of actions completed during the past month.
 - a. Ongoing site installation for structural reinforcement for portable crane installation
 - b. Ongoing site installation of structural reinforcement on the Unit 500 crane pedestal
- 7. List of actions to be taken the next month.
 - a. Continue work on potable water, and marine sanitation system repairs.
 - b. Complete site installation of structural reinforcement for portable crane installation.
 - c. Complete site installation of structural reinforcements on the Unit 500 crane pedestal.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.

- 10. Current status of the crane(s).
 - a. **South crane:** crane has been removed for overhaul. Refurbished crane is scheduled to be installed in Q4 2023.
 - b. **Portable crane:** Portable crane is ready for installation and currently staged onshore, waiting for direction from COP to proceed with installation.
 - c. Any additional cranes: 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.

Travel 3 Lunch , S Reading Log Inspector Denise Casares 6837 Client Beacon West Repair — TVA 2020-95 Contact Doug Taylor Facility Platform Hogan Reinspection ___ Start Uilsam Office Page 1 Rule 531 Permit None End 2. 15 pm Cell 805 4559 050 Quarterly Work Order 112674 Type Repair Repair Repair Leak RFR Leak Leak Time Rate Component Size Location Rate Type **Green Tag** Time Subarea Path Area **Metal Tag** Number Above ground Mell 4000 FC Well Boy Clamp Description: Repair Repair Repair Leak Leak RFR Leak Rate Time Component Size Type Location Rate Green Tag Subarea Path Time Area **Metal Tag** 37.2 Number TI FR Above grand East 40900 WellBay Description: Rakin Repair Repair Repair Leak RFR Leak Leak Time Rate Component Size Type Location Rate Green Tag Time Subarea Path Area **Metal Tag** Number 224 11 2512 TC Well Bry ealline Description: Repair Repair Leak Repair Leak RFR Leak Time Rate Component Size Type Rate **Green Tag** Location Time Path Subarea Area **Metal Tag** Number Above goun Buil 6042 TC WellBau Description: Repair Repair Repair Leak **RFR** Leak Leak Time Rate Component Size Type Location Rate Green Tag Time Subarea Path Area **Metal Tag** Number V5 34400

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Platform Hogan Variance Order 2021-05-M3 August 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for August 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.** All necessary Level 1 repairs are completed, and firewater system repairs are ongoing and planned to be competed in October 2023.
- Fugitive emissions inspection log records specified in District Rule 331.G.4. See Attachment A in July 2023 update.
- 6. List of actions completed during the past month.
 - a. Completed site installation for structural reinforcement for portable crane installation
 - b. Completed site installation of structural reinforcement on the Unit 500 crane pedestal
- 7. List of actions to be taken the next month.
 - a. Continue work on potable water, and marine sanitation system repairs.
 - b. Start portable crane installation
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.

- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment is ongoing. Refurbished crane is scheduled to be installed in Q4 2023.
 - b. **Portable crane:** Portable crane is ready for installation and currently staged onshore, currently scheduled for installation in September-October
 - c. Any additional cranes: 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 Hogan Variance Order 2021-05-M3 September 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for September 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 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.** All necessary Level 1 repairs are completed, and firewater system repairs are ongoing and planned to be competed in October 2023.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** 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. Started the portable crane installation
- 7. List of actions to be taken the next month.
 - a. Continue work on potable water, and marine sanitation system repairs.
 - b. Continue with portable cranes installation
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.

- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment is ongoing. Refurbished crane is scheduled to be installed in Q1 2024.
 - b. **Portable crane:** Portable crane is ready for installation and currently staged onshore, currently scheduled for installation in October.
 - c. Any additional cranes: 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 Hogan Variance Order 2021-05-M3 October 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for October 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 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.** All necessary Level 1 repairs are completed, and firewater system repairs are ongoing and planned to be competed in November 2023.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** 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. Started the portable crane installation. Nautilus 280B crane installation completed. Ongoing preparation for Unit 20000 crane installation
- 7. List of actions to be taken the next month.
 - a. Continue work on potable water, and marine sanitation system repairs.
 - b. Continue with portable cranes installation. Install Unit 20000 crane by mid-December
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North Crane, crew boat, deck drain sump tank, and settling sump tank.
- 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. All
 required and high priority Level 1 repairs have been completed as of Sept 2022.

- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment is ongoing. Refurbished crane (ATC 15978) is scheduled to be installed in Q1 2024.
 - b. **Portable crane:** Nautilus 280B portable crane (ATC 16054) was installed on Platform Hogan in October. Unit 20000 portable crane (ATC 15962) is ready for installation and currently staged onshore, currently scheduled for installation in December 2023.
 - c. **Any additional cranes:** 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 Hogan Variance Order 2021-05-M3 November 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for November 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.** All necessary Level 1 repairs are completed, and firewater system repairs are ongoing and planned to be competed in November 2023.
- 5. Fugitive emissions inspection log records specified in District Rule 331.G.4. See Attachment A.
- 6. List of actions completed during the past month.
 - a. Started the portable crane installation. Nautilus 280B crane installation completed. Completed preparation to initiate Unit 20000 crane installation
- 7. List of actions to be taken the next month.
 - a. Commission potable water system RO unit. Continue planning commissioning of marine sanitation system.
 - b. Continue with portable cranes installation. Ongoing Unit 20000 crane installation, estimated completion by 3rd week of December
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.

- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment is ongoing. Refurbished crane (ATC 15978) is scheduled to be installed in Q1 2024.
 - b. **Portable crane:** Nautilus 280B portable crane (ATC 16054) was installed on Platform Hogan in October. Unit 20000 portable crane (ATC 15962) is currently being installed, estimated completion by 3rd week of December 2023.
 - c. Any additional cranes: 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 Hogan Variance Order 2021-05-M3 December 2023 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for December 2023:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 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.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A. Next Method 21 inspection will occur in February 2024.
- 6. List of actions completed during the past month.
 - a. Initial installation of Unit 20000 crane delayed due to several punchlist items to allow operation of the crane.
 - b. Completed commissioning of potable water system RO unit. Noted several punchlist items to allow continuous operation of RO unit.
- 7. List of actions to be taken the next month.
 - a. Complete punchlist items for potable water system RO unit. Continue planning commissioning of marine sanitation system.
 - b. Complete punchlist items for Unit 20000 crane.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.
- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment is ongoing. Refurbished crane (ATC 15978) is scheduled to be installed in Q1 2024.
 - b. **Portable crane:** Nautilus 280B portable crane (ATC 16054) was installed on Platform Hogan in October and in operation. Unit 20000 portable crane (ATC 15962) installation ongoing. Currently working on punchlist items to allow operation of the crane.
 - c. Any additional cranes: 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 Hogan Variance Order 2021-05-M3 January 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for January 2024:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - **c.** Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
- 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.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A. Next Method 21 inspection will occur in February 2024.
- 6. List of actions completed during the past month.
 - a. Ongoing preparation of materials and resources for remediation of Unit 20000 crane.
 - b. Potable water system RO unit. ongoing procurement of materials for punchlist items to allow continuous operation of RO unit.
- 7. List of actions to be taken the next month.
 - a. Complete punchlist items for potable water system RO unit. Continue planning commissioning of marine sanitation system.
 - b. Complete remediation and commission the Unit 20000 crane.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022.
- 10. Current status of the crane(s).
 - a. **South crane:** crane refurbishment completed and enroute to California. Refurbished crane (ATC 15978) is scheduled to be installed in Q1 2024.
 - b. **Portable crane:** Unit 20000 portable crane (ATC 15962) installation ongoing. Currently working on remediation and commissioning of the crane.
 - c. Any additional cranes: 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 Hogan Variance Order 2021-05-M3 February 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for February 2024:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A. Next Method 21 inspection will occur in May 2024.
- 6. List of actions completed during the past month.
 - a. Installation of Unit 20000 crane ongoing.
 - b. Potable water system RO unit. ongoing punchlist items and recommissioning of the RO
- 7. List of actions to be taken the next month.
 - a. Complete remediation and commission the Unit 20000 crane.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022. Progress started on Level 1 Phase 2 repairs.

- 10. Current status of the crane(s).
 - a. **South crane:** Crane refurbishment completed and crane components staged onshore. Refurbished crane (ATC 15978) is scheduled to be installed in Q2 2024.
 - b. **Portable crane:** Unit 20000 portable crane (ATC 15962) installation ongoing. Currently working on remediation and commissioning of the crane.
 - c. Any additional cranes: 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 Hogan

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Metal Tag	Green Tag Number	Area Well Pary	Subarea A - 40	Location AGCNV	Component		Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	
Metal Tag	Green Tag Number	Area Well Pary	Subarea A-40 er north	Location AGCNV Nest 12	Component PAM AM 1	Size	Leak Path	Leak Time	Leak Rate	Repair	/	Repair	Time
	Green Tag Number	Area Area Area	Subarea A - 40	Location AGCNV West 12	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Time
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		POOL	A-40	AGCS	EMM		,						
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escription :)	A-40 center S		Component	Size	+01	Leak Time	-	Repair Type	RFR	Repair Rate	Repair Time
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escription :	hove g	Area	1	outh R		Size	+or	Leak	Leak		RFR		
escription :	Green Tag Number	Area Well YSay	Subarea A-LO	Location AGCS	Component 2AM	Size	+or	Leak	Leak Rate	Туре	RFR		
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Metal Tag	Green Tag Number	Area Well Bay	Subarea A 5 1	Location AGOS	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type		Repair Rate	Repair Time
Metal Tag	Green Tag Number	Area Well Bay	Subarea A 5 1	Location AGOS	Component	size	Leak Path	Leak Time	Leak Rate	Repair Type		Repair	Repair
Metal Tag Metal Tag Metal Tag	Green Tag Number	Area Well Area Well Well	Subarea A 5 1 MATON SI	Location AGOS Location Location	Component FL Componen	size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
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Metal Tag	Green Tag Number	Area Well Bay Yound co	Subarea A 5 1 M + OV Subarea A - S 1	Location AGOS Location Location	Component FL Componen	size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
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Metal Tag escription : Metal Tag	Green Tag Number	Area Well Bay YUVId CO	Subarea A 5 1 A 7 5 1 A 7 5 1 A 7 5 1	Location AGOS Location AGCS	Component FL Componen	t Size	Leak Path TC Leak Path TC TC	Leak Time	Leak Rate Leak Rate Leak Rate	Repair Type	RFR	Repair Rate	Repair Time Repair Time

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Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Time
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		Well	A-1	AGCS	EAM		tc		40700				
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		rund o	-enger s	south t	ZAM		Leak Path	Leak Time	Leak Rate		RFR		
Metal Tag	Green Tag Number	Area Well	Subarea A - L	Location AGCV	Component		Leak	Leak Time	Leak		RFR		
	Green Tag Number	Area Well	Subarea A - L	Location	Component		Leak Path	Leak Time	Leak Rate		RFR		Time
Metal Tag	Green Tag Number	Area Well	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path	Leak Time	Leak Rate	Type	RFR	Rate	Time
Metal Tag	Green Tag Number	Area Well	Subarea A - L	Location AGCV	Component	Size	Leak Path	Leak Time	Leak Rate	Туре		Rate	Time
Metal Tag	Green Tag Number	Area Well Yound a	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path	Leak Time	Leak Rate	Type		Rate	Time
Metal Tag	Green Tag Number	Area Well Yound a	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path	Leak Time	Leak Rate	Type		Rate	Time
Metal Tag	Green Tag Number	Area Well Yound a	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path	Leak Time	Leak Rate	Type		Rate	Time
Metal Tag escription : A	Green Tag Number	Area Well Yound a	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path	Leak Time	Leak Rate	Type		Rate Repair Rate	Repair Time
Metal Tag escription : A	Green Tag Number	Area Well Yound a	Subarea A - 14 M+er No	Location AGCV SOUTH R	Component PAM	Size	Leak Path () Leak Path	Leak Time	Leak Rate	Type		Rate	Repair Time

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Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Path	. Time	Rate	Туре	1	Rate	Time
		WellBay	A-49	ram	RAM		TC	- 1	67100				
escription : (eaking	From three	aded con	nection	ram 1	top	You	u al	oove g	round	center	-	
	3												
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak	Leak Rate	Repair Type	RFR	Repair Rate	Repair
	redinber	Wellkay	A- 49	ram 3	Ram		TC		67400				
escription :	Leaking	from the	eaded co		ram 3	to	PYO	u al	pove of	vound a	center		
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	Number	Well Ray	A 48	AGC	WHC		С		58100				
escription : \	aking Gr		above grou	nd cent	er				1				
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1 /	Number	Wellkay	AG 27A	Aac	WHC	-	С		49700				
	- VC - C		1 .	above q	round	en	ter						
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escription : \				1	Component	Size	Leak Path	Leak	Leak Rate	Repair Type	RFR	Repair Rate	Repa
	Green Tag	Area	Subarea	Location					-	-			
Metal Tag	Green Tag Number	4.7		AG E			VS		58900				
	Number	Mall Bay	AGZTA	-	VBAL	e C		dea					

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Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Number	Well Bay	AG 27A	AGU	value		TC		13200				
Description:	leaving	Com value	stem ox	r value at	oove gro	لما	Wes	+					
	Green Tag		Subarea	Location	Component	Size	Leak	Leak	Leak Rate	Repair	RFR	Repair Rate	Repair Time
Metal Tag	Number	Area	A-9	AGW	Brake		Path	Time	5973	1,7,00		241	Time
Description:	leaking (ron thread				re	door	e gr	and v	UEST			
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		Area	led conne	ection on	ball vali		Leak	Leak Time	Leak	Repair	RFR		
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Metal Tag Description: \(\(\)	Green Tag Number	Area MellBay ron well hea	Subarea A-(A	Location AGC Location Location	Component Wellhead Clamp Component Component G	Size	Leak Path Clamp Leak Path TC	Leak Time	Leak Rate 157.00	Repair Type Repair Type	RFR	Repair Rate	Repair Time
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1/3	-	Well Bay	A-4	AGS	BP		TC		11800				
escription:	Bullalus	beaking fro	in Harrad	ed conne	ction (260	ve an	round	Sout	h East			
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Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak	Leak Rate	Repair Type	RFR	Rate	Time
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1	X 200	WellBay	A2	AGCN	a whole		.45		62300				
escription:	sale val	ve leaking	from Nal	restem o	who we gro	und	Cent	ner 1	Jorth				
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						_	Leak	Leak	Leak	Repair	DED	Repair	Repai
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Metal Tag	Green Tag Number	Area	Subarea	Location	Componen	t Size	Leak Path	Leak	Leak Rate	Repair Type	RFR	Rate	Time
		1 1 0		top rap ram	7 50			1	11-1-0	.	1		
		Well Bay	P-11	AGCS	ram		TC	10	60100		1		him
escription : \	20 (94)	ram 4 abo				lea		F			ed a	mreo	rion

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escription : J	Green Tag	m 4 astone	ground c	ram 4 AGCH center por	rth Leab	ang	Leak	Leak	Leak	Repair	1	Repair	
-	of Lon to	WellBay		ram 4				om .		ded C	onnec	tion	
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		hyllizan	A 11	ram 4	man	-	TC		60300		3		
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Metal Tag	Green Tag	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repa
escription : }	SP TOW T	am 3 above	-ground o	Sent of Do	or que ceac	7416	1	10-1					
	- (0)	Well Bay	A-11	ram 3	ran lea	///	TC	na 4		ed con	rection	`	
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escription : +	ob Lon	ram labou	e ground	center no	orth lea	king	210	m TV	Weare	Con			
		Nell Bay	11-A	ram! AGEN	ram		TC		57000	Can	nection	h	
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Path	Time	Rate	Туре		rate	
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Platform Hogan Variance Order 2021-05-M3 March 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for March 2024:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - b. Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.** All necessary Level 1 repairs are completed, and firewater system repairs are completed. Preparing for well rig removal.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** 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. Completed installation of Unit 20000 crane.
 - b. Potable water system RO unit. completed punchlist items and recommissioning of the RO unit
- 7. List of actions to be taken the next month.
 - a. None.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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. All required and high priority Level 1 repairs have been completed as of Sept 2022. Progress started on Level 1 Phase 2 repairs.

- 10. Current status of the crane(s).
 - a. **South crane:** Crane (ATC 15978) refurbishment completed and crane components staged onshore, scheduled to be installed in Q2 2024.
 - b. Portable crane: Unit 20000 portable crane (ATC 15962) installation completed.
 - c. **Any additional cranes:** 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 Hogan Variance Order 2021-05-M3 April 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for April 2024:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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. Next Method 21 inspection will occur in May 2024.
- 4. **Status of ongoing safety repairs to the platform.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
- 5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** 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 preparations for the installation of the South Crane.
 - b. Removed well rig, sub base and kill water tank.
- 7. List of actions to be taken the next month.
 - a. Complete the installation of the South Crane
 - b. Initiate project on 2024 Level 1 repairs
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North 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.

 Initiating additional Level 1 Phase 2 repairs (decking, deck coating, stairs, railings, etc.)

- 10. Current status of the crane(s).
 - a. **South crane:** Crane (ATC 15978) refurbishment completed and crane components staged on platform for scheduled installation Q2 2024.
 - b. **Portable crane:** Unit 20000 portable crane (ATC 15962) installation completed.
 - c. **Any additional cranes:** 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.

Platform Hogan Variance Order 2021-05-M3 May 2024 Monthly Update Report

Pursuant to condition #1 of Variance Order 2021-05-M3, Beacon West Energy Group hereby submits the following information for Platform Hogan for May 2024:

- 1. Status of actions taken on Increments of Progress:
 - a. Identify well rig(s) necessary for fugitive leak repair within 6 months of Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - Complete platform deck alterations necessary for the well rig(s) within 18 months of the Appeal Resolution. Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. Begin well bay fugitive leak repairs within 20 months of the Appeal Resolution.

 Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. Complete 100% of well bay fugitive leak repairs within 38 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.
- 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.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
- 5. Fugitive emissions inspection log records specified in District Rule 331.G.4. See Attachment A.
- 6. List of actions completed during the past month.
 - a. Completed preparations for the installation of the South Crane.
 - b. Removed well rig, sub base and kill water tank.
- 7. List of actions to be taken the next month.
 - a. Complete the installation of the South Crane.
 - b. Kickoff sitework for proposed 2024 Level 1 repairs.
- 8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R4 for list of permitted equipment. The only currently operating equipment are North Crane, crew boat, deck drain sump tank, and settling sump tank.
- 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.
 Initiating additional Level 1 Phase 2 repairs (decking, deck coating, stairs, railings, etc.)
- 10. Current status of the crane(s).
 - a. **South crane:** Crane (ATC 15978) Ongoing installation, estimated completion by June 2024

- b. **Portable crane:** Unit 20000 portable crane (ATC 15962) installation completed.
- c. Any additional cranes: 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.