Platform Hogan
Variance Order 2021-05-M3
June 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 June 2024:

a. **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.
b. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in May 2024 update for components with completed repairs. Next Method 21 inspection will occur in Augusts 2024.
c. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in the May 2024 Update.
d. **Status of ongoing safety repairs to the platform.** All necessary Level 1 repairs are completed, and firewater system repairs are completed.
e. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in May 2024 update. Next Method 21 inspection will occur in August 2024.
f. **List of actions completed during the past month**.
    a. Completed the installation of the South Crane.
    b. Completed installation and repair of helideck.
g. **List of actions to be taken the next month.**
    a. Disassemble and transfer the portable crane (Nautilus 280B) to Platform Houchin.
    b. Kickoff sitework for proposed 2024 Level 1 repairs.
h. **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.
i. **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.)

j. **Current status of the crane(s).**
    a. **South crane:** Crane (ATC 15978) Completed installation completed June 2024
    b. **Portable crane:** Unit 20000 portable crane (ATC 15962) installation completed.
    c. **Any additional cranes:** N/A.
k. **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.
l. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Hogan
Variance Order 2021-05-M3
July 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 July 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 May 2024 update for components with completed repairs. Next Method 21 inspection will occur in August 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 the May 2024 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 in May 2024 update. Next Method 21 inspection will occur in August 2024.
6. **List of actions completed during the past month**.
    a. Completed disassembly of portable crane (Nautilus 280B). Started transfer of components to Platform Houchin.
7. **List of actions to be taken the next month.**
    a. Progressing planning and engineering for platform accommodation buildings.
    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.
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).**
    All platform cranes are in service and operating.
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 for July Excess emissions calculations using Correlation Equation will start in the August report.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Platform Hogan
Variance Order 2021-05-M4
August 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for August 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 for components with completed repairs. Next Method 21 inspection will occur in November 2024.
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.** Ongoing preparations to kickoff site installation of proposed 2024 Level 1 repairs (hand rails, deck plate, stair treads. 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 November 2024.
6. **List of actions completed during the past month**.
    a. Completed disassembly and transfer of portable crane (Nautilus 280B) to Platform Houchin.
7. **List of actions to be taken the next month.**
    a. Progressing planning and engineering for platform accommodation buildings.
    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.
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).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in August 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for August are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection
August 21, 2024

Reading Log

Client: Beacon West | Gate: | Inspector: Valeria Cardona | Date: 8/21/24
Facility: Platform Hogan | Contact: Doug Taylor | TVA: 2020.73 | Travel: 1 | Lunch: 0.5
Rule: 331 | Permit: None | Office: | Start: 6:00 am | Repair:
Work Order: 11916 93 | Type: Quarterly | Cell: (805) 455-9650 | End: | Reinspection: 1
Page: 1 of 10

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	A-49	AGLS	Ram	1	TC	7:12 am	94,400	—	—	—	—
Description: Ram #3 on top row, above ground center South													

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	A-49	AGLSW	Ram	1	TC	7:16 am	20,400	—	—	—	—
Description: Ram #1 on top row, above ground center south West													

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	A-40	AGLNE	Ram	1	TC	7:25	25300	—	—	—	—
Description: Ram #1 on top row, above ground center North East													

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	A-40	AGLN	Ram	1	TC	7:26	31600	—	—	—	—
Description: Ram #2 on top row, above grand 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	A-40	AGLN	Ram	1	TC	7:27	63800	—	—	—	—
Description: Ram #3 on top row, above ground center North													

Client Beacon West
Facility Platform Hogan
Rule 331
Work Order 119693
Permit None
Type Quarterly

Reading Log

Gate
Contact Doug Taylor
Office
Cell (805)455-9650

Inspector Valeria Cardona
TVA 202073
Start 6:00am
End

Date 8/21/24
Travel 1 Lunch 0.5
Repair
Reinspection 1
Page 2 of 10

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	A-40	AGCN	Ram	1	TC	7:29	95000	—			

Description: Ram #4 top row, above grand 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	A-40	AGCN	Ram	1	TC	7:30	95100	—			

Description: only Ram in middle row, above grand 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	A-40	AGCNE	Ram	1	TC	7:31	95100	—			

Description: Ram #1 on bottom row, above ground center North East

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	A-40	AGCN	Ram	1	TC	7:32	6741	—			

Description: Ram #2 on bottom row, above grand 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	A-40	AGCN	Ram	1	TC	7:33	4891	—			

Description: Ram #3 on bottom row, above ground center North

Client: Beacon West | Gate: | Inspector: Valeria Cardona | Date: 8/21/24
Facility: Platform Hogan | Contact: Doug Taylor | TVA: 202073 | Travel: 1. | Lunch: 0.5
Rule: 331 | Permit: None | Office: | Start: 6:00am | Repair:
Work Order: 11aR3 | Type: Quarterly | Cell: (805)455-9650 | End: | Reinspection: 1
Reading Log | Page: 3 of 10

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	A-40	AGCNW	Ram	1	TC	7:34	14600	—			
Description: Ram #4 on Bottom row, Above ground center North West													

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	A-40	AGCN	capling	2	TC	7:37	15100	—			
Description: electrical connector, 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	A-40	AGCSW	Ram	1	TC	7:39	35200	—			
Description: Ram #4 on bottom row, above ground center South West													

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	A-40	AGCSW	Ram	1	TC	7:41	95400	—			
Description: Ram # 4 on top row, above grand center South West													

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	A-40	AGCS	Ram	1	TC	7:41	95400	—			
Description: Ram #3 on top row, above grand center South													

Client Beacon West
Facility Platform Hogan
Rule 331
Work Order 119493

Permit None
Type Quarterly

Reading Log

Gate
Contact Doug Taylor
Office
Cell (805)455-9150

Inspector Valeria Cardona
TVA 202073
Start 10:00am
End

Date 8/21/24
Travel 1 Lunch 0.5
Repair
Reinspection
Page 4 of 10

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	A-40	AGCS	Ram	1	TC	7:42	55700	—			
Description: Ram #3 on Bottom row, above ground center south													

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	A-40	AGCSW	Ram	1	TC	7:45	42700	—			
Description: Ram #1 on top row, above ground center South West													

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	A-40	AGCSW	Ram	1	TC	7:46	40800	—			
Description: Ram #1 on bottom row, above ground center, South West													

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	A-40	AGCSW	Reducer	1	TC	7:47	11900	—			
Description: above ground center south West Reducer													

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	A-51	AGCS	Ram	1	TC	7:53	95900	—			
Description: Ram #3 on top row, above ground center South													

Client Beacon West
Facility Platform Hogan
Rule 331 Permit None
Work Order 11gv93 Type Quarterly

Reading Log

Gate
Contact Doug Taylor
Office
Cell (805)455-9150

Inspector Valeria Cardona
TVA 202073
Start 10:00am
End

Date 8/21/24
Travel 1. Lunch 0.5
Repair —
Reinspection 1
Page 5 of 10

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	A-40	AGCW	Valve	3	VS	8:58	94200	—			

Description: reading at above ground center west valve stem

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	A-51	AGC	Clamp	16	TC	9:05	95400	—			

Description: reading at above ground center clamp

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	A-48	AGC	clamp	16	TC	9:10	95100	—			

Description: reading at above ground center clamp

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	AG-27A	AGCE	Valve	2	TC	9:14	95300	—			

Description: reading at above ground center East ball valve 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	AG-27A	AGC	Clamp	16	TC	9:18	94900	—			

Description: reading at above grand center clamp

Client Beacon West
Facility Platform Hogan
Rule 331
Work Order 119693
Permit None
Type Quarterly

Reading Log

Gate
Contact Doug Taylor
Office
Cell (805)455-9650

Inspector Valeria Cardona
TVA 202073
Start 6:00
End

Date 8/21/24
Travel 1 Lunch 0.5
Repair
Reinspection 1
Page 6 of 10

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	A-9	AGW	Valve manifold	1	TC	9:26	32100	TI	/	104	10:41

Description: reading at threaded connection on Above ground center west valve manifold

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	A-43	AGCN	Valve	3	VS	9:30	2058	—	—	—	—

Description: reading at above ground center North valve stem

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	A-53	AGCW	Reducer	1	TC	9:40	96100	—	—	—	—

Description: reading at above ground center west reducer

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	A-53	AGCN	capling	2	TC	9:42	96100	—	—	—	—

Description: reading at electrical connector, 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	A-23	AGCS	VMan	1	TC	9:49	2002	TI	/	40.1	10:49

Description: reading at above ground center South valve manifold

Client: Beacon West
Facility: Platform Hogan
Rule: 331
Work Order: 119693
Permit: None
Type: Quarterly

Reading Log

Gate:
Contact: Doug Taylor
Office:
Cell: (805)455-9650

Inspector: Valeria Cardona
TVA: 202073
Start: 6:00 am
End:

Date: 8/21/24
Travel: 1 Lunch: 0.5
Repair: —
Reinspection: 1
Page: 7 of 10

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	A-23	AGLNW	VBall	3	VS	9:52	96400	—	—	—	—
Description: reading at valve stem on above grand center North West ball valve													

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	A-1	AGLS	Ram	1	TC	9:58	47100	—	—	—	—
Description: reading at ram #3 on top row, Above grand center South													

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	A-7	AGLSW	VMan	1	TC	10:25	46400	TI	/	379	10:54
Description: reading at threaded connection on above grand center south West valve manifold													

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	A-18	AGLNW	Reducer	1	TC	10:33	4391	—	—	—	—
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	A-14	AGLN	Ram	1	TC	11:40	96700	—	—	—	—
Description: reading at ram #2 top row, above grand center North													

Reading Log

Client: Beacon West | Gate: | Inspector: Valeria Cardona | Date: 8/21/24
Facility: Platform Hogan | Contact: Doug Taylor | TVA: 202073 | Travel: 1 | Lunch: 0.5
Rule: 331 | Permit: None | Office: | Start: 10:00 am | Repair: 0
Work Order: 11916 93 | Type: Quarterly | Cell: (805) 455-9650 | End: | Reinspection: 1
Page: 8 of 10

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	A-14	AGLNW	Ram	1	TC	11:41	96400	—	—	—	—

Description: reading at Ram #4 top row, above ground center ↑ West / 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	A-14	AGLSW	Ram	1	TC	11:49	18400	—	—	—	—

Description: reading at Ram #1 top row, above ground center south west

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	A-14	AGE	VMan	1	TC	11:50	10500	TI	/	21	2:20

Description: reading at above ground east valve manifold

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	A-11	AGLSW	Ram	1	TC	11:54	97500	—	—	—	—

Description: reading at Ram #1 top row, above ground center south west

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	A-11	AGLS	Ram	1	TC	11:56	7291	—	—	—	—

Description: reading at Ram #2 top row, above ground center south

Client: Beacon West
Facility: Platform Hogan
Rule: 331
Work Order: 119693
Permit: None
Type: Quarterly

Reading Log

Gate:
Contact: Doug Taylor
Office:
Cell: (805)455-9650

Inspector: Valeria Cardona
TVA: 202073
Start: 6:00am
End:

Date: 8/21/24
Travel: 1 Lunch: 0.5
Repair: 0
Reinspection: 1
Page: 9 of 10

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	A-11	AGCSE	Ram	1	TC	11:57	97600				

Description: reading at above ground center South east Ram #4 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	A-11	AGCNE	Ram	1	TC	12:03	97700				

Description: reading at Ram #1 top row, above ground center North East

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	A-11	AGCN	Ram	1	TC	12:05	20300				

Description: reading at Ram #3 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	A-11	AGCNW	Ram	1	TC	12:00	97800				

Description: reading at Ram #4 top row, above ground center North West

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	A-2	OCN	Valve	3	VS	12:24	28900				

Description: reading at valve stem on overhead center North valve

Reading Log

Client: Beacon West
Facility: Platform Hogan
Rule: 331
Work Order: 114493
Permit: None
Type: Quarterly
Gate:
Contact: Doug Taylor
Office:
Cell: (805)455-9150
Inspector: Valeria Cardona
TVA: 202073
Start: 6:00am
End:
Date: 8/21/24
Travel: 1 Lunch: 0.5
Repair:
Reinspection: 1
Page: 10 of 10

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	A-4	OCN	Valve	3	VS	12:26	5011	—	—	—	—

Description: reading at valve stem on overhead center North valve

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	A-4	AGE	Plug	2	TC	12:30	4213	—	—	—	—

Description: reading at threaded connection on above ground east plug

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	A-49	AGCS	Ram	1	TC	12:41	1783	—	—	—	—

Description: reading at Ram #3 bottom row, Above ground center South

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	A-50	AGC	clamp	16	TC	12:59	9200	—	—	—	—

Description: reading at clamp Above ground center

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

Description:

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
August 2024

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
August 2024

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissisons[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	1	3	4	1.27E-02	9.76E+00	0.013	29.280	29.293	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	6	33	39	6.35E-04	1.37E+00	0.004	45.210	45.214	0.31	14.02	0.64	2.56	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
September 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for September 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 August 2024 update for components with completed repairs. Next Method 21 inspection will occur in November 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 August 2024 update.
4. **Status of ongoing safety repairs to the platform.** Ongoing preparations to kickoff site installation of proposed 2024 Level 1 repairs (hand rails, deck plate, stair treads. Firewater system repairs are completed.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in August 2024 update. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month**.
    None
7. **List of actions to be taken the next month.**
    a. Progressing planning and engineering for platform accommodation buildings.
    b. Kickoff sitework for proposed 2024 Level 1 repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in September 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for September 2024 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See August 2024 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
September 2024

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
September 2024

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissions[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	1	3	4	1.27E-02	9.76E+00	0.013	29.280	29.293	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	6	33	39	6.35E-04	1.37E+00	0.004	45.210	45.214	0.31	14.02	0.64	2.56	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
October 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for October 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 August 2024 update for components with completed repairs. Next Method 21 inspection will occur in November 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 August 2024 update.
4. **Status of ongoing safety repairs to the platform.** Started site work for 2024 Level 1 repairs. Ongoing demo of wellbay catwalk and piping. Pending repair/mods of misc. hand rails, deck plate, and stair treads. Firewater system repairs are completed.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in August 2024 update. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month**.
7. Started site work for 2024 Level 1 repairs. Ongoing demo of wellbay catwalk and piping
   List of actions to be taken the next month.
    a. Progressing planning and engineering for platform accommodation buildings.
    b. Proposed 2024 Level 1 repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for 2024 Level 1 repairs. Ongoing demo of wellbay catwalk and piping. Pending repair/mods of misc. hand rails, deck plate, and stair treads.
10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in October 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for October 2024 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See August 2024 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
October 2024

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
October 2024

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissisons[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	1	3	4	1.27E-02	9.76E+00	0.013	29.280	29.293	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	6	33	39	6.35E-04	1.37E+00	0.004	45.210	45.214	0.31	14.02	0.64	2.56	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
November 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for November 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 August 2024 update for components with completed repairs. Next Method 21 inspection will occur in December 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 August 2024 update.
4. **Status of ongoing safety repairs to the platform.** Continuing work for 2024 Level 1 repairs. Completed demo of wellbay catwalk and piping. Completed repair/mods of misc. hand rails, and stair treads. Firewater system repairs are completed. Pending deck plate repairs
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in August 2024 update. Next Method 21 inspection will occur in December 2024.
6. **List of actions completed during the past month**.
    a. Continue site work for 2024 Level 1 repairs. Completed demo of wellbay catwalk and piping
    b. Completed repair/mods of misc. Handrails and stair treads
7. **List of actions to be taken the next month.**
    a. Progressing planning and engineering for platform accommodation buildings.

b. Complete remaining 2024 Level 1 repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for 2024 Level 1 repairs. Ongoing demo of wellbay catwalk and piping. Pending repair/mods of misc. hand rails, deck plate, and stair treads.
10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in November 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for November 2024 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See August 2024 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
November 2024

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
November 2024

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissisons[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	1	3	4	1.27E-02	9.76E+00	0.013	29.280	29.293	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	6	33	39	6.35E-04	1.37E+00	0.004	45.210	45.214	0.31	14.02	0.64	2.56	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**10**	**39**	**49**			**0.0221**	**96.48**	**96.50**		**29.92**	**1.36**	**5.46**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
December 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for December 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 for components with completed repairs. Next Method 21 inspection will occur in March 2025.
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.** Continuing work for 2024 Level 1 repairs. Working on schedule of deck plate UT measurements to finalize scope of repair.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month**.
7. Continue site work for 2024 Level 1 repairs. **List of actions to be taken the next month.**
    a. Progressing planning and engineering for platform accommodation buildings.
    b. Complete remaining 2024 Level 1 repairs – deck plate repairs.
8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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. Started site work for 2024 Level 1 repairs. Working on schedule of deck plate UT measurements to finalize scope of deck repairs.

10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in December 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for December 2024 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

Reading Log

Client: Bexar West | Gate: | Inspector: Edgar Araujo | Date: 12-18-24
Facility: Hogan Platform | Contact: | TVA: 2020-616 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 8:00 am | Repair:
Work Order: 121993 | Type: | Cell: | End: 12:00 pm | Reinspection:
Page 1 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 11	GL	West ram	3/4	Threads		2,03%				
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 11	GL	West ram	3/4	Thread		9.78%				
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 11	GL	East ram	3/4	Threads		3,296				
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 11	GL	East ram	3/4	Threads		9.78%				
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 11	GL	South Flange	3"	Gasket Flange	10:05	3,100				
Description:													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: ~~Beacon West~~ Platform Hagar | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12.18.24
Travel: Lunch:
Repair:
Reinspection:
Page: 2 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 19	GL	Clamp head		Clamp	8:04	1,121				
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 19	GL	East ram	3/4	Thread	8:05	1,783				
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 4	GL	Valve	6"	Stem	8:28	6000				
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 4	~~GL~~ AG	South plug	1"	~~Thru~~ Thread	8:25	4210				
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 2	GL	Valve	6"	Stem		2400				
Description:													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: Platform Hogan | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12.18.24
Travel: Lunch:
Repair:
Reinspection:
Page: 3 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 14	GL	West ram	3/4	thread	9:67	9.69%				
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 14	GL	West ram	3/4	thread		9:69%				
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 14	GL	East ram	3/4	thread		1.84%				
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 11	GL	valve	6"	Bottom Flange	9:54	1,200				
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 11	GL	West ram	3/4	thread		9.77%				
Description:													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: Platform Hagen | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12.18.24
Travel: Lunch:
Repair:
Reinspection:
Page: 4 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 50	AG	Well head Clamp		West Clamp	4,600	10:30 am				
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 47	AG	head clamp		East Clamp	[illegible]	2,082				
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 1	AG	West ram	3/4	Thread		4.7%				
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 23	AG	Norm Valve	6"	Stem		9.64%				
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 40	AG	East Plug	1"	Thread		1.48%				
Description :													

Preventative Maintenance Plan

Reading Log

Client	Beacon West	Gate		Date	12.18.24
Facility	Platform Hogan	Contact		Travel	Lunch
Rule	Permit None	Office		Inspector	
Work Order	121993 Type	Cell		TVA	
				Start	
				End	
				Repair	
				Reinspection	
				Page	5 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 46	A6	East ram	3/4	thread		1.48%				

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 46	A6	East ram	3/4	thread		1.48%				

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 46	A6	East ram	3/4	thread		1.48%				

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 46	A6	East ram	3/4	thread		1.48%				

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 46	A6	East ram	3/4	thread		1.48%				

Description :

Preventative Maintenance Plan

Reading Log

Client	Beacon West	Gate		Date	12·18·24
Facility	Platform Hogan	Contact		Travel	
				Lunch	
Rule		Permit	None	Repair	
Work Order	121993	Type		Reinspection	
		Office		Inspector	
		Cell		TVA	
				Start	
				End	
				Page	6 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 40	AC	East ram	3/4	thread		1.48%				

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 40	A6	East ram	3/4	thread		1·48%				

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 40	A6	East ram	3/4	thread		1.48%				

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 40	A6	East ram	3/4	thread		1.48%				

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 40	A6	North [illegible]	6"	stem		1.48%				

Description :

Preventative Maintenance Plan

Reading Log

Client	Beacon West	Gate		Date	12.18.24
Facility	Platform Hogan	Contact		Travel	Lunch
Rule	Permit None	Office		Repair	
Work Order	121993 Type	Cell		Reinspection	
		Inspector		Page	7 of 12
		TVA			
		Start			
		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 40	A6	West ram	3/4	thread		1.48%				
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 40	A6	West ram	3/4	thread		1.48%				
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 40	A6	West ram	3/4	thread		1.48%				
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 40	A6	West ram	3/4	thread		1.48%				
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 40	A6	West ram	3/4	thread		1.48%				
Description :													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: Platform Hagan | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12·18·24
Travel: Lunch:
Repair:
Reinspection:
Page: 8 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-46	[redacted] OH South	plug			4:15	2300				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-44	AG East	Ram				1.5%				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-44	AG East	Ram				1200				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-44	AG East	Ram				1100				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-44	AG East	Ram				1.2%				
Description:													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: Platform Hagan | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12.18.24
Travel: | Lunch:
Repair:
Reinspection:
Page: 9 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-51	AG North	flange				1200				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-51	AG East	Ram				1800				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-51	AG East	Ram				3200				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-51	AG East	Ram				2200				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-48	AG [redacted] South	flange				5000				
Description :													

Reading Log

Client: Beacon West | Gate: | Inspector:
Facility: Platform Hagar | Contact: | TVA:
Rule: | Permit: None | Office: | Start:
Work Order: 121993 | Type: | Cell: | End:

Date: 12.18.24
Travel: | Lunch:
Repair:
Reinspection:
Page: 10 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A48	Ag North	flange				2500				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-48	Ag North	flang				1500				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-53	Ag West	Plug				10.8%				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			A-53	Ag East	fitting				10%				
Description:													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Ag-27A	Ag South	fitting				10%				
Description:													

Preventative Maintenance Plan

Reading Log

Client: Beacon West
Facility: Platform Hogan
Rule:
Permit: None
Work Order: 121993
Type:

Gate:
Contact:
Office:
Cell:

Inspector:
TVA:
Start:
End:

Date: 12·18·24
Travel: Lunch:
Repair:
Reinspection:
Page: 11 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well 40	A6	West ram	3/4	thread		1.48%				
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 40	A6	West ball valve	1"	thread		1.48%				
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 :													

Reading Log

Client Beacon West | Gate | Inspector Sawyer Ramirez | Date 12/18/24
Facility Hogen | Contact | TVA 2020-02 | Travel ____ Lunch ____
Rule 331 | Permit None | Office | Start 8:00 am | Repair
Work Order 121493 | Type | Cell | End 12:00 pm | Reinspection
Page 12 of 12

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Ag-27A	Ag South	flang				6000				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Ag-27A	Ag East	Ram				1300				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Ag-27A	Ag North	flang				1600				
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 :													

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
December 2024

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
December 2024

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissions[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	3	0	3	1.27E-02	9.76E+00	0.038	0.000	0.038	0.31	0.01	0.00	0.00	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	10	29	39	6.35E-04	1.37E+00	0.006	39.730	39.736	0.31	12.32	0.56	2.25	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	7	0	7	1.48E-03	3.23E+00	0.010	0.000	0.010	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
January 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for January 2025:

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 December 2024 update for components with completed repairs. Next Method 21 inspection will occur in March 2025.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in December 2024 update.
4. **Status of ongoing safety repairs to the platform.** Continuing work for 2024 Level 1 repairs. Completed deck plate UT survey of wellbay area, and remaining thicknesses passed the WT criteria. Continue with visual and UT inspection of other areas of the platform to scope out repairs.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in December 2024 update. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month**.
    a. Continue site work for 2024 Level 1 repairs. Completed deck plate UT survey of wellbay area, and remaining thicknesses passed the WT criteria. Continue with visual and UT inspection of other areas of the platform, to scope out repairs.
    b. Started platform preparations for accommodation buildings
7. **List of actions to be taken the next month.**
    a. Continue platform preparations for accommodation buildings.

b. Complete remaining 2024 Level 1 repairs – continue with deck plate UT surveys and scope out repairs.

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for 2024 Level 1 repairs. Working on schedule of deck plate UT measurements to finalize scope of deck repairs.
10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in January 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for January 2025 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See December 2024 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
January 2025

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
January 2025

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissisons[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	3	0	3	1.27E-02	9.76E+00	0.038	0.000	0.038	0.31	0.01	0.00	0.00	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	10	29	39	6.35E-04	1.37E+00	0.006	39.730	39.736	0.31	12.32	0.56	2.25	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	7	0	7	1.48E-03	3.23E+00	0.010	0.000	0.010	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
February 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for February 2025:

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 December 2024 update for components with completed repairs. Next Method 21 inspection will occur in March 2025.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in December 2024 update.
4. **Status of ongoing safety repairs to the platform. Operations working on application of protective coating of deck plate sections that passed UT testing.**
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in December 2024 update. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month**.
    a. Continue site work for 2024 Level 1 repairs. Operations working on application of protective coating on deck plate sections that passed UT testing.
    b. Started platform preparations for accommodation buildings
7. **List of actions to be taken the next month.**
    a. Continue platform preparations for accommodation buildings.
    b. Complete remaining 2024 Level 1 repairs

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for 2024 Level 1 repairs. Working on application of protective coating.
10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in February 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for February 2025 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See December 2024 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
February 2025

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
February 2025

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissisons[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	3	3	6	1.85E-03	7.33E+00	0.006	21.990	21.996	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	3	0	3	1.27E-02	9.76E+00	0.038	0.000	0.038	0.31	0.01	0.00	0.00	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	10	29	39	6.35E-04	1.37E+00	0.006	39.730	39.736	0.31	12.32	0.56	2.25	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	7	0	7	1.48E-03	3.23E+00	0.010	0.000	0.010	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**23**	**32**	**55**			**0.0604**	**61.72**	**61.78**		**19.15**	**0.87**	**3.50**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
March 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for March 2025:

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. Next Method 21 inspection will occur in June 2025.
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.** Operations working on application of protective coating of deck plate sections that passed UT testing.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A. Next Method 21 inspection will occur in June 2025.
6. **List of actions completed during the past month**.
    a. Continue site work for Level 1 repairs. Operations working on application of protective coating on deck plate sections that passed UT testing.
    b. Started structural modifications and electrical installation to prepare for installation of building modules.
7. **List of actions to be taken the next month.**
    a. Complete structural modifications, continue electrical installations and kickoff mechanical and plumbing installations for accommodation buildings.
    b. Complete remaining Level 1 repairs

8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for Level 1 repairs. Working on application of protective coating.
10. **Current status of the crane(s).**
    All platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in March 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for March 2025 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

Reading Log

Client: Beacon West | Gate: | Inspector: Torres Lucas | Date: 3-10-25
Facility: Hogan Platform | Contact: Doug Parker | TVA: 2020-34 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00am | Repair:
Work Order: 124126 | Type: PM | Cell: (805)455-9650 | End: | Reinspection:
Page 1 of 11

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	#19	AGW	RAM	1	TC	9:24	3300	—			

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	A-46	AG	GAUGE	1	TC	9:30	1200	—			

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	A-4	AG	NIPPLE	2"	TC	9:34	1.56%	—			

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	A-41	AG	plug	1/2"	TC	9:36	1100	—			

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	A-14	AGE	RAM	1	TC	9:45	4.61%	—			

Description :

Reading Log

Client	Beacon West	Gate		Inspector	Torresco Lucas	Date	3-10-25
Facility	Hogan Platform	Contact	Doug Taylor	TVA	2020-54	Travel / Lunch	
Rule	331	Permit	None	Start	9:00am	Repair	
Work Order	124126	Type	PM	Office		Reinspection	
				Cell	(805)455-9650	Page	2 of 11
				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	A-14	AGSE	Ram	1	TC	9:46	5.21%				

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	A-14	AGSW	Ram	1	TC	9:48	2.47%				

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	A-11	AGC	Flange	4"	Gasket	9:52	1600				

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	A-11	AGN	Flange	2"	Gasket	9:55	4500				

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	A-11	AG	Reducer	1"	TC	10:00	1.56%				

Description :

Reading Log

Client: Beacon West | Gate: | Inspector: Tonasso Lucas | Date: 3-10-25
Facility: Holman Plat Farm | Contact: Doug Taylor | TVA: 2020-54 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 AM | Repair:
Work Order: 124126 | Type: PM | Cell: (505)455-9650 | End: | Reinspection:
Page 3 of 11

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	A-11	AGS	Flange	2"	Connect	10:02	4.58%				
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	A-1	AG	Ram	1"	TC	10:10	4.01%				
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	A-23	AG	Stem	1"	valve stem	10:12	1400				
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	A53	AG	valve	2"	TC	10:15	1.25%				
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	A-50	AG	Clamp	10"	clamp	10:30	7700				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edwin Araujo | Date: 3-10-25
Facility: Hagan Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventative Maintenance | Cell: (505) 455-9650 | End: | Reinspection:
Page: 4 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-43	GL	valve stem	6"	stem		1,200 ppm				
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 A-49	GL	East ram	3/4"	head		1,600 ppm				
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 A-49	GL	East ram	3/4"	head		7,800 ppm				
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 A-49	GL	East ram	3/4"	head		35% ppm				
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 A-49	GL	East ram	3/4"	head		7,000 ppm				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edgvin Arayo | Date: 3-10-25
Facility: Hagar Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventive maintenance | Cell: (805) 455-9650 | End: | Reinspection:
Page 5 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-49	GL	well head		clamp		30%				
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 A-51	GL	East ram	3/4"	head		3.5%				
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 A-51	GL	East ram	3/4"	head		1,800 PPM				
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 A-51	GL	East ram	3/4"	head		4,800 PPM				
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 A-51	GL	west ram	3/4"	head		8,400 PPM				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edguin Araujo | Date: 3-10-25
Facility: Hogan platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventive Maintenance | Cell: (805) 455-9650 | End: | Reinspection:
Page: 6 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-51	GL	west ram	3/4"	head		3,300 ppm				
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 A-51	GL	flange	3"	gasket		1,400 ppm				
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 A-48	GL	Well head		Clamp		9.4%				
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 A-48	GL	flange	6"	gasket		4,600 ppm				
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 A-27	GL	flange	3"	gasket		6,000 ppm				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edgar Arayo | Date: 3-10-25
Facility: Hogan Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: ____ Lunch: ____
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair: ____
Work Order: ____ | Type: Preventive Maintenance | Cell: (805) 415-9650 | End: ____ | Reinspection: ____
Page 7 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-27	GL	ram	3/4"	head		1,300 ppm				
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 A-27	GL	flange	4"	gasket		9.5%				
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 A-27	GL	Threaded Nipple	2"	threads		1,300 ppm				
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 A-27	GL	valve	6"	stem		1.5%				
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 A-27	GL	well head		clamp		10 %				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edgar Araujo | Date: 3-10-25
Facility: Hogan Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventive Maintence | Cell: (805) 455-9650 | End: | Reinspection:
Page: 8 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-40	AG	East ram	3/4"	head		6,000 ppm				

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 A-40	GL	East ram	3/4"	head		2,000 ppm				

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 A-40	GL	East ram	3/4"	head		2,500 ppm				

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 A-40	GL	East ram	3/4"	head		10.%				

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 A-40	GL	East ram	3/4"	head		8,400 ppm				

Description :

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edgar Arayo | Date: 3-10-25
Facility: Hogan Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventative Maintenance | Cell: (805) 455-9650 | End: | Reinspection:
Page 9 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-40	GL	East ram	3/4"	head		1,800 ppm				
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 A-40	GL	East ram	3/4"	head		10 % ppm				
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 A-40	GL	East ram	3/4"	head		8,200 ppm				
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 A-40	GL	East ram	3/4"	head		4,600 ppm				
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 A-40	GL	Valve	6"	stem		35 %				
Description :													

Reading Log

Client: Beacon West Energy Group | Gate: | Inspector: Edgar Araujo | Date: 3-10-25
Facility: Hogan Platform | Contact: Doug Taylor | TVA: 2020-66 | Travel: | Lunch:
Rule: 331 | Permit: None | Office: | Start: 9:00 am | Repair:
Work Order: | Type: Preventive Maintenance | Cell: (805) 455-9650 | End: | Reinspection:
Page: 10 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-40	GL	West ram	3/4"	head		4,800 ppm				
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 A-40	GL	West ram	3/4"	head		3,400 ppm				
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 A-40	GL	West ram	3/4"	head		8,200 ppm				
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 A-40	GL	West ram	3/4"	head		5,400 ppm				
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 A-40	GL	West ram	3/4"	head		5,800 ppm				
Description :													

Reading Log

Client: Beacon West Energy Group
Facility: Hogan Platform
Rule: 331
Permit: None
Work Order:
Type: Preventive Maintenance
Gate:
Contact: Doug Taylor
Office:
Cell: (805) 455-9650
Inspector: Edgar Araiza
TVA: 2020.66
Start: 9:00 am
End:
Date: 3-10-25
Travel: Lunch:
Repair:
Reinspection:
Page: 11 of 11

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			Well A-40	GL	West ram	3/4"	Head		10%				

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 A-40	GL	Threaded Nipple	1"	Threads		4,000 ppm				

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 A-40	GL	Connection	2"	Thread		4,600 ppm				

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 :

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
March 2025

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
March 2025

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissions[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	2	3	5	1.85E-03	7.33E+00	0.004	21.990	21.994	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	2	3	5	1.27E-02	9.76E+00	0.025	29.280	29.305	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	25	11	36	6.35E-04	1.37E+00	0.016	15.070	15.086	0.31	4.68	0.21	0.85	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	5	2	7	1.48E-03	3.23E+00	0.007	6.460	6.467	0.31	2.00	0.09	0.37	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
April 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for April 2025:

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 the March 2025 update for components with completed repairs. Next Method 21 inspection will occur in June 2025.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in the March 2025 update.
4. **Status of ongoing safety repairs to the platform.** Operations working on application of protective coating of deck plate sections that passed UT testing.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in the March 2025 update. Next Method 21 inspection will occur in June 2025.
6. **List of actions completed during the past month**.
    a. Continue site work for 2024 Level 1 repairs. Operations working on application of protective coating on deck plate sections that passed UT testing.
    b. Completed 2025 Level 1 Inspection of Platform Hogan. Working on final report.
    c. Continued work on structural modifications and electrical installation to prepare for installation of building modules. Started mechanical and plumbing installations.

7. **List of actions to be taken in the next month.**
    a. Complete structural modifications, continue electrical installations and continue with mechanical and plumbing installations for accommodation buildings.
    b. Start buildings installation as they arrive.
    c. Complete remaining 2024 Level 1 repairs
8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Started site work for 2024 Level 1 repairs. Working on application of protective coating. Completed 2025 Level 1 inspection. Plan for implementation of identified minor repairs.
10. **Current status of the crane(s).**
    Both platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs. and tons of ROCs:** No excess emissions through flare stack in April 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for April 2025 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See March 2025 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
April 2025

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
April 2025

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissions[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	2	3	5	1.85E-03	7.33E+00	0.004	21.990	21.994	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	2	3	5	1.27E-02	9.76E+00	0.025	29.280	29.305	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	25	11	36	6.35E-04	1.37E+00	0.016	15.070	15.086	0.31	4.68	0.21	0.85	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	5	2	7	1.48E-03	3.23E+00	0.007	6.460	6.467	0.31	2.00	0.09	0.37	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.

Platform Hogan
Variance Order 2021-05-M4
May 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-05-M4, Beacon West Energy Group hereby submits the following information for Platform Hogan for May 2025:

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 the March 2025 update for components with completed repairs. Next Method 21 inspection will occur in June 2025.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in the March 2025 update.
4. **Status of ongoing safety repairs to the platform.** Operations continue to work on application of protective coating of deck plate sections that passed UT testing.
5. **Fugitive emissions inspection log records specified in District Rule 331.G.4.** See Attachment A in the March 2025 update. Next Method 21 inspection will occur in June 2025.
6. **List of actions completed during the past month**.
    a. Continue site work for 2024 Level 1 repairs. Operations continue to work on application of protective coating on deck plate sections that passed UT testing.
    b. Completed 2025 Level 1 Inspection and Report for Platform Hogan. Started implementation of minor repairs (deck plate, handrails, etc.).
    c. Continued work on structural modifications and electrical installation to prepare for installation of building modules. Continue with mechanical and plumbing installations.

7. **List of actions to be taken in the next month.**
    a. Complete structural modifications, continue electrical installations and continue with mechanical and plumbing installations for accommodation buildings.
    b. Start buildings installation as they arrive.
    c. Complete remaining 2024 Level 1 repairs
8. **List of Permitted Equipment and current status.** Refer to PTO 9108-R5 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.** Ongoing site work for 2024 Level 1 repairs. Working on application of protective coating. Completed 2025 Level 1 inspection. Started implementation of identified minor repairs.
10. **Current status of the crane(s).**
    Both platform cranes are in service and operating.
11. **Monthly excess emissions, if any, calculated in lbs. and tons of ROCs:** No excess emissions through flare stack in May 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using Correlation Equation. Excess emission calculations for May 2025 are included as Attachment B.
12. **Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Hogan - Quarterly Method 21 Inspection

See March 2025 Monthly Update

Attachment B
Platform Hogan - Fugitive ROC Emissions Information
May 2025

Table 5.1.0
Platform Hogan
Fugitive ROC Emissions Information[a]
May 2025

Service Type / Component Type	Accessibility Group	Number of Components Screened[b]			SVRFs[c] for THC lb/comp/day		THC Emissions by SVRF Range, and Total, lb/day			ROC/THC Ratio	Total ROC Emissions[d]			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
Gas/Light Liquid Service															
Valves	Accessible	2	3	5	1.85E-03	7.33E+00	0.004	21.990	21.994	0.31	6.82	0.31	1.24	5.74E-04	2.27E+00
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
							0.000	0.000	0.000						
Others	Accessible	2	3	5	1.27E-02	9.76E+00	0.025	29.280	29.305	0.31	9.08	0.41	1.66	3.94E-03	3.03E+00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-03	3.03E+00
							0.000	0.000	0.000						
Connectors	Accessible	25	11	36	6.35E-04	1.37E+00	0.016	15.070	15.086	0.31	4.68	0.21	0.85	1.97E-04	4.25E-01
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	4.25E-01
							0.000	0.000	0.000						
Flanges	Accessible	5	2	7	1.48E-03	3.23E+00	0.007	6.460	6.467	0.31	2.00	0.09	0.37	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		
Oil Service															
Valves	Accessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.66E-04	2.09E+00
Others	Accessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.76E-03	2.82E-01
Connectors	Accessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	2.96E-04	6.94E-01
Flanges	Accessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	7.11E-04	7.73E+00
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Subtotal: Oil		**0**	**0**	**0**			**0.00**	**0.00**	**0.00**		**0.00**	**0.00**	**0.00**		
Total: Gas/LL + Oil		**34**	**19**	**53**			**0.0524**	**72.80**	**72.85**		**22.58**	**1.03**	**4.12**		

Notes:

[a] See APCD Policy and Procedure 6100.072.1998 for an explanation of the terms and calculation process used in this table.

[b] The distribution of components in the "<10K" and "≥10K" columns may vary; the values shown are not limits.

[c] SVRF = screening value range factor

[d] Permitted ROC emissions limits are detailed by service type in Tables 5.1-3, 5.1-4, 5.2 and 5.3.