

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

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

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in April 2024 update for components with completed repairs. Next Method 21 inspection will occur in July 2024.
3. **List of outstanding well bay fugitive leak repairs.** Repairs are outstanding for all fugitive leaks not listed as repaired in Attachment A in April 2024 update.
4. **Status of ongoing safety repairs to the platform.** Completed planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once portable crane is moved to Houchin. Continue with planning and implementation of remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in April 2024 update. Next Method 21 inspection will occur in July 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Ongoing fabrication for access hatches modification/replacement. Estimated completion July 2024.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs.

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

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

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

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in April 2024 update for components with completed repairs. Next Method 21 inspection will occur in 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 April 2024 update.
4. **Status of ongoing safety repairs to the platform.** Completed planned deck plate replacement. Completed south access stairs mods. North access stairs mods will be completed once portable crane is moved to Houchin. Continue with planning and implementation of remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in April 2024 update. Next Method 21 inspection will occur in August 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Completed fabrication for access hatches modification/replacement. Plan to complete field installation by end of August 2024.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs.
 - b. Install Nautilus 280B Crane at Platform Houchin

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

Platform Houchin
Variance Order 2021-04-M4
August 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for August 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A for components with completed repairs. 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.** Completed planned deck plate replacement. Completed south access stairs mods. Ongoing fabrication of proposed North access stairs mods . Ongoing preparations to kickoff remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Completed fabrication for access hatches modification/replacement. Plan to complete field installation by end of September 2024.

- b.** Completed installation of Nautilus 280B crane at Platform Houchin
- 7. List of actions to be taken in the next month.**
 - a.** Continue work on Level 1 Phase 2 repairs.
- 8. List of Permitted Equipment and current status.** Refer to PTO 9109-R4 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
- 9. Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
- 10. Current status of the crane(s).**
 - a. South crane:** South Crane installed and in service.
 - b. Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. Any additional crane units:** N/A
- 11. Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in August 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using the Correlation Equation. Excess emission calculations for August 2024 are included as Attachment B.
- 12. Status of the Appeal Resolution.** Appeal Resolution is being monitored by ConocoPhillips.

Attachment A
Platform Houchin - Quarterly Method 21 Inspection
August 28, 2024

Client Beacon West Energy Group Gate Reading Log Date 8/28/24
 Facility Platform Houchin Inspector Valeria Cardona Travel — Lunch 1.5
 Rule 331 Permit None Contact Doug Taylor TVA 202073 Repair —
 Work Order 119891 Type Preventative Maintenance Office doug.taylor@beaconwest.com Shift 6:00 AM Reinspection —
 Cell (805) 455-9650 End — Page 1 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
—	—	Well Bay	B-46	AGCE	Nipple	2	TL	7:03	14100	—	—	—	—
Description: <u>reading at above ground center east threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
—	—	Well Bay	B-46	AGCNW	Ram	1	TL	7:06	17200	—	—	—	—
Description: <u>reading at above ground center North West top row ram #4 threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
—	—	Well Bay	B-39	AGCN	Ram	1	TL	7:24	94400	—	—	—	—
Description: <u>reading at above ground center North, top row ram #3 threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
—	—	Well Bay	B-39	AGCNW	Ram	1	TL	7:27	94400	—	—	—	—
Description: <u>reading at above ground center North West, top row, ram #4 threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
—	—	Well Bay	B-30	AGCN	Valve	3	V ^s	7:30	94500	—	—	—	—
Description: <u>reading at above ground center North valve stem</u>													

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Client Beacon West Energy Group Gate _____ Reading Log Date 8/28/24
 Facility Platform Houchin Inspector Valeria Cardona Travel _____ Lunch 15
 Rule 331 Permit None Contact Dan Taylor TVA 202073 Repair _____
 Work Order 119891 Type Preventative Maintenance Office david.taylor@beaconwest.com Start 11:00 AM Reinspection _____
 Cell (805) 455-9650 End _____ Page 2 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGW	Valve	2	VS	7:35	94600				
Description: <u>reading at above ground west valve stem</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	AGE	Ram	1	TL	7:38	1142				
Description: <u>reading at above ground center East top row Ram #4, threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-1	AGE	VMan	1	TL	7:43	21900	TI		121	10:05
Description: <u>reading at above ground east threaded connection on valve manifold</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-15	AGSW	Valve	2	VS	7:52	2087				
Description: <u>reading at above ground south west valve stem</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-3	AGL	Clamp	1/2	TL	8:28	4221				
Description: <u>reading at above ground center threaded connection</u>													

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Client Beacon West Energy Group Gate Reading Log Inspector Valeria Cardona Date 8/28/24
 Facility Platform Houchin Contact Dan Taylor TVA 202073 Travel Lunch 5
 Rule 331 Permit None Office david.taylor@beaconwest.com Station 10:00 AM Repair
 Work Order 119891 Type Preventative Maintenance Cell 18051455-9650 End Reinspection
 Page 3 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-33	AGLNW	Ram	1	TL	8:50	95800				
Description: reading at above ground center North West threaded connection, top row Ram #3													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-33	AGLSE	Ram	1	TL	8:54	96000				
Description: reading at above ground center south east threaded connection, top row Ram #3													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	AGCN	Valve	3	VS	9:14	22300				
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	B-37	AGW	VMan	1	TL	9:18	17100	TI		10.8	10:20
Description: reading at above ground west threaded connection on 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	B-36	AGW	Valve	1	TL	9:24	3574	TI		94	11:00
Description: reading at above ground west threaded connection													

PREPARED BY MONTROSE AIR QUALITY SERVICES

Client Beacon West Energy Group Gate Reading Log Date 8/28/24
 Facility Platform Houchin Inspector Valeria Cardona Travel Lunch 5
 Rule 331 Permit None Contact Dan Taylor TVA 202073 Repair
 Work Order 119891 Type Preventative Maintenance Office david.taylor@brown-ws.com Shift 10:00 AM Reinspection
 Cell (805) 455-9650 End Page 4 of 4

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-34	AGCSW	Nipple	1 TC	9:45	97000					
Description: <u>reading at above ground center south west threaded connection</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay											
Description: <u> </u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay											
Description: <u> </u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay											
Description: <u> </u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay											
Description: <u> </u>													

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Attachment B
Platform Houchin - Fugitive ROC Emissions Information
August 2024

Table 5.1.0
Platform Houchin
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 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	1	3	4	1.85E-03	7.33E+00	0.002	21.990	21.992	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
Others	Accessible	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
	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
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.002	12.330	12.332	0.31	3.82	0.17	0.70	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
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
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
Pump Seals/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		
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/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		

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 Houchin
Variance Order 2021-04-M4
September 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for September 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in 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.** Completed planned deck plate replacement. Completed south access stairs mods. Completed fabrication of proposed North access stairs mods, currently coordinating installation schedule. Ongoing preparations to kickoff remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in the August 2024 update. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Completed fabrication for access hatches modification/replacement. Plan to complete field installation by end of October 2024.

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – installation of North access stairs and access hatches mods.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in September 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection
See August 2024 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
September 2024

Table 5.1.0
Platform Houchin
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	1	3	4	1.85E-03	7.33E+00	0.002	21.990	21.992	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
Others	Accessible	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
	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
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.002	12.330	12.332	0.31	3.82	0.17	0.70	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
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
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
Pump Seals/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		
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/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		

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 Houchin
Variance Order 2021-04-M4
October 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for October 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in 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.** Completed installation of proposed North access stairs mods. Ongoing preparations to kickoff remaining Level 1 Phase 2 repairs . Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in the August 2024 update. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Completed fabrication for access hatches modification/replacement. Plan to complete field installation by end of November 2024.

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Completed installation of North access stairs. Pending site construction for access hatches mods.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in October 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

See August 2024 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
October 2024

Table 5.1.0
Platform Houchin
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 Emissions ^(d)			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<10K	≥ 10K
<u>Gas/Light Liquid Service</u>															
Valves	Accessible	1	3	4	1.85E-03	7.33E+00	0.002	21.990	21.992	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
Others	Accessible	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
	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
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.002	12.330	12.332	0.31	3.82	0.17	0.70	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
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
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
Pump Seals/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		
<u>Oil Service</u>															
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/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		

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 Houchin
Variance Order 2021-04-M4
November 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for November 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress, ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed and date repaired.** See entries in "Repair Type" column of Attachment A in 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.** Ongoing preparations to kickoff remaining Level 1 Phase 2 repairs. Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in the August 2024 update. Next Method 21 inspection will occur in November 2024.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Completed fabrication for access hatches modification/replacement. Plan to complete field installation by January 2025.

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Pending site construction for access hatches mods.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in November 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

See August 2024 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
November 2024

Table 5.1.0
Platform Houchin
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 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	1	3	4	1.85E-03	7.33E+00	0.002	21.990	21.992	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
Others	Accessible	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
	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
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.002	12.330	12.332	0.31	3.82	0.17	0.70	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
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
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
Pump Seals/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		
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/ Compressor 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
	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		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94		

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 Houchin
Variance Order 2021-04-M4
December 2024 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for December 2024:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A for components with completed repairs. 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.** Level 1 Phase 2 repairs on queue for kickoff after completion of rig removal project. Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff after completion of rig removal project.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Complete field installation of access hatches mods.

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in December 2024. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

Reading Log

Client Beacon West
 Facility Houction
 Rule 331 Permit None
 Work Order 12231 Type Q4

Gate _____
 Contact _____
 Office _____
 Cell _____

Inspector Javier Ramirez
 TVA 2020-02
 Start 8:00
 End 4:30

Date 12/23/24
 Travel _____ Lunch _____
 Repair _____
 Reinspection _____
 Page 1 of 2

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			30	A9 East	Rens				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
			30	A9 East	plug				2.5%				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-3	A9 West	bottom bolt				1.57%				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			15	A9 East	Valve				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
			15	A9 East	Plug				1520				

Description :

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Reading Log

Client Brown West Gate _____ Inspector SAUL R. Ramirez Date 12/23/14
 Facility Houlihan Contact _____ TVA DA 2010-02 Travel _____ Lunch _____
 Rule 331 Permit None Office _____ Start 9:00 Repair _____
 Work Order 122231 Type _____ Cell _____ End 9:50 Reinspection _____
 Page 2 of 2

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		B-39	B-39	Ag West	Ram				10.00				
Description : <u>--- 10%---</u>													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-46	Ag West	Ram				10.00				
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 :													

PREPARED BY MONTROSE AIR QUALITY SERVICES

Reading Log

Client Benton West Gate _____ Inspector Toussaint Date 12/25/24
 Facility Houlihan Contact _____ TVA 2020-54 Travel _____ Lunch _____
 Rule 331 Permit None Office _____ Start 8:00 AM Repair _____
 Work Order 122231 Type 24 Cell _____ End 1:50 PM Reinspection _____
 Page 1 of 1

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-34	N6 EAST	Ram				1267				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-34	N6 NORTHEAST	Pump Stem				9.1%				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-33	N6 EAST	Ram				2.35%				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			B-33	N6 WEST	Ram				3.14%				
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 :													

PREPARED BY MONTROSE AIR QUALITY SERVICES

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
December 2024

Table 5.1.0
Platform Houchin
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		
Gas/Light Liquid Service															
Valves	Accessible	1	1	2	1.85E-03	7.33E+00	0.002	7.330	7.332	0.31	2.27	0.10	0.41	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
Others	Accessible	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
	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
Connectors	Accessible	3	6	9	6.35E-04	1.37E+00	0.002	8.220	8.222	0.31	2.55	0.12	0.47	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
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
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
Pump Seals/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		
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/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		

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 Houchin
Variance Order 2021-04-M4
January 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for January 2025:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A in 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 the December 2024 update.
4. **Status of ongoing safety repairs to the platform.** Level 1 Phase 2 repairs on queue for kickoff after completion of rig removal project. Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in the December 2024 update. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff after completion of rig removal project.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Complete remaining demo of rig auxillary equipment to facilitate field installation of access hatches mods.

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in January 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

See December 2024 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
January 2025

Table 5.1.0
Platform Houchin
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 Emissions ^(d)			SVRFs for ROC lb/comp/day	
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy		
Gas/Light Liquid Service															
Valves	Accessible	1	1	2	1.85E-03	7.33E+00	0.002	7.330	7.332	0.31	2.27	0.10	0.41	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
Others	Accessible	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
	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
Connectors	Accessible	3	6	9	6.35E-04	1.37E+00	0.002	8.220	8.222	0.31	2.55	0.12	0.47	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
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
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
Pump Seals/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		
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/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		

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 Houchin
Variance Order 2021-04-M4
February 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for February 2025:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A in 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 the December 2024 update.
4. **Status of ongoing safety repairs to the platform.** Level 1 Phase 2 repairs on queue for kickoff after completion of rig removal project. Firewater system piping and pump replacement in progress. Helideck repairs in progress.
5. **Records for monthly fugitive leak surveys.** See Attachment A in the December 2024 update. Next Method 21 inspection will occur in March 2025.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff after completion of rig removal project.
7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Complete remaining demo of rig auxillary equipment to facilitate field installation of access hatches mods.

8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in February 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

See December 2024 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
February 2025

Table 5.1.0
Platform Houchin
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 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	1	1	2	1.85E-03	7.33E+00	0.002	7.330	7.332	0.31	2.27	0.10	0.41	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
Others	Accessible	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
	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
Connectors	Accessible	3	6	9	6.35E-04	1.37E+00	0.002	8.220	8.222	0.31	2.55	0.12	0.47	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
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
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
Pump Seals/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		
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/ Compressor 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
	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		4	7	11			0.0038	15.55	15.55		4.82	0.22	0.88		

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 Houchin
Variance Order 2021-04-M4
March 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for March 2025:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A for components with completed repairs. 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.** Level 1 Phase 2 repairs on queue for kickoff once resources are freed up from Hogan preparations for accommodation building modules. Firewater system piping and pump replacement in progress. Firewater pump #1 installed, working on replacement of washdown pump. Helideck repairs was completed.
5. **Records for monthly fugitive leak surveys.** See Attachment A. Next Method 21 inspection will occur in June 2025.
6. **List of actions completed during the past month.**
 - a. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff once resources are freed up from Hogan preparations for accommodation building modules.

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs – Hogan preparations for accommodation building modules.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank, and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.) once resources are freed up from Hogan preparations for accommodation building modules.
10. **Current status of the crane(s).**
 - a. **South crane:** South Crane installed and in service.
 - b. **Portable crane.** Portable crane (ATC 16054) was moved from Platform Hogan and installed on Platform Houchin in August 2024.
 - c. **Any additional crane units:** N/A
11. **Monthly excess emissions, if any, calculated in lbs and tons of ROCs:** No excess emissions through flare stack in March 2025. Excess well head fugitive emissions identified by Method 21 screening were calculated using the 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 Houchin - Quarterly Method 21 Inspection

Reading Log

Date 3-11-25

Travel Lunch

Repair

Reinspection

Page 1 of 3

Client BEACON WEST ENERGY GROUP

Facility PLATFORM HOUCHIN

Rule 331 Permit None

Work Order 124250 Type PREVENTATIVE MAINTENANCE

Gate

Contact DOUGLASS TAYLOR

Office DOUGLASS TAYLOR & BROWN .COM

Cell 1805/455-9650

Inspector TORRES LUIS

TVA 2020-54

Start 6:00 AM

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	B346	A6	RAM	1"	TL	7:24	2.13%				

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	B3-39	A6	RAM	1"	TL	7:30	3.46%				

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	B315	A6	PLUG	3/4"	TL	7:40	2400				

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	B33	AGE	RAM	1"	TL	7:47	1.89%				

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	B3-33	AGE	RAM	1"	TL	7:48	3.76%				

Description :

PREPARED BY MONTROSE AIR QUALITY SERVICES

Reading Log

Client BRACON WEST ENERGY GROUP Gate _____ Inspector TERRISO LUCAS
 Facility PLATFORM HOUCHW Contact DOUG H TAYLOR TVA 2020-54
 Rule 331 Permit None Office DOUG H TAYLOR & BRACON.COM Start 6:00 AM
 Work Order 124356 Type PREVENTATIVE MAINTENANCE Cell (805) 455-9450 End 4:00 PM
 Date 3-11-25
 Travel _____ Lunch _____
 Repair _____
 Reinspection _____
 Page 2 of 3

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-19	A6	valve	6"	valve stem	8:00	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
		Well Bay	B-34	A6	plug	3/4"	plug		1.2%				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-34	A6	flange	6"	gasket		ppm 7,600				

Description :

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-34	A6	well head	?	clamp		35.5%				

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 Bay	B-34	A6	East ram	3/4"	cup		ppm 1,600				

Description :

Reading Log

Client BEACON WEST ENERGY GROUP
 Facility PLATFORM HOOKHIN
 Rule 331 Permit None
 Work Order 124356 Type PREVENTATIVE MAINTENANCE

Gate _____
 Contact DOUGL H. TAYLOR
 Office DOUGL H. TAYLOR & BEACON, LOM
 Cell (905) 455-9450

Inspector 506WEN
 TVA 2020-66
 Start 6:00am
 End _____

Date 3-11-25
 Travel _____ Lunch _____
 Repair _____
 Reinspection _____
 Page 3 of 3

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	A6	Gate Valve	6"	stem		ppm 4,800				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	A6	West ram	3/4"	cap		1.12%				
Description :													

Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Bay	B-30	A6	Gate Valve	6"	stem		1.2%				
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 Houchin - Fugitive ROC Emissions Information
March 2025

Table 5.1.0
Platform Houchin
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	1	3	1.85E-03	7.33E+00	0.004	7.330	7.334	0.31	2.27	0.10	0.41	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
Others	Accessible	0	1	1	1.27E-02	9.76E+00	0.000	9.760	9.760	0.31	3.03	0.14	0.55	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
Connectors	Accessible	2	6	8	6.35E-04	1.37E+00	0.001	8.220	8.221	0.31	2.55	0.12	0.47	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
Flanges	Accessible	1	0	1	1.48E-03	3.23E+00	0.001	0.000	0.001	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
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
Pump Seals/ Compressor 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
	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		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		
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/ Compressor 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
	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															
		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		

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 Houchin
Variance Order 2021-04-M4
April 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for April 2025:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A in 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.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings etc.). Firewater system piping and pump replacement in progress. Firewater pump #1 installed, working on replacement of washdown pump. Helideck repairs were completed.
5. **Records for monthly fugitive leak surveys.** 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. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff.

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.).
10. **Current status of the crane(s).**

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 the 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 Houchin - Quarterly Method 21 Inspection

See March 2025 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
April 2025

Table 5.1.0
Platform Houchin
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	1	3	1.85E-03	7.33E+00	0.004	7.330	7.334	0.31	2.27	0.10	0.41	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
Others	Accessible	0	1	1	1.27E-02	9.76E+00	0.000	9.760	9.760	0.31	3.03	0.14	0.55	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
Connectors	Accessible	2	6	8	6.35E-04	1.37E+00	0.001	8.220	8.221	0.31	2.55	0.12	0.47	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
Flanges	Accessible	1	0	1	1.48E-03	3.23E+00	0.001	0.000	0.001	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
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
Pump Seals/ Compressor 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
	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		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		
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/ Compressor 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
	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		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		

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 Houchin
Variance Order 2021-04-M4
May 2025 Monthly Update Report

Pursuant to condition 2 of Variance Order 2021-04-M4, Beacon West Energy Group hereby submits the following information for Platform Houchin for May 2025:

1. **Status of actions taken on Increments of Progress:**
 - a. **Begin District Rule 331 inspections for fugitive leaks on a quarterly basis using a Method 21 approved device starting in the third quarter of 2023:** Method 21 inspections were initiated on Platform Houchin in July 2023.
 - b. **Identify well rig(s) necessary for fugitive leak repair within 6 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - c. **Complete platform deck alterations necessary for the well rig(s) within 38 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - d. **Begin well bay fugitive leak repairs within 41 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
 - e. **Complete 100% of well bay fugitive leak repairs within 59 months of the Appeal Resolution.** Beacon West is aware of this Increment of Progress; ConocoPhillips is tracking the Appeal. No actions taken.
2. **List of well bay fugitive leak repairs completed, and date repaired.** See entries in "Repair Type" column of Attachment A in 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.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings etc.). Firewater system piping and pump replacement in progress. Firewater pump #1 installed, working on replacement of washdown pump. Helideck repairs were completed.
5. **Records for monthly fugitive leak surveys.** 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. Ongoing work on Level 1 Phase 2 repairs. Field installation of access hatches on queue for kickoff after completion of Platform Hogan P&A preparations

7. **List of actions to be taken in the next month.**
 - a. Continue work on Level 1 Phase 2 repairs once Platform Hogan P&A preparations are completed.
8. **List of Permitted Equipment and current status.** Refer to PTO 9109-R5 for list of permitted equipment. The only currently operating equipment are Unit crane, Portable Crane (ATC 16054), crew boat, deck drain sump tank and settling sump tank.
9. **Status of ongoing repairs to platform, including those preventing compliance either by limiting access or acquiring materials for repair for conditions and rules subject to this variance.** Level 1 Phase 2 repair work will continue throughout the entire platform (deck plate, deck coating, stairs, railings, etc.) once Platform Hogan P&A preparations are completed.
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 the 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 Houchin - Quarterly Method 21 Inspection

See March 2025 Monthly Update

Attachment B
Platform Houchin - Fugitive ROC Emissions Information
May 2025

Table 5.1.0
Platform Houchin
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	1	3	1.85E-03	7.33E+00	0.004	7.330	7.334	0.31	2.27	0.10	0.41	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
Others	Accessible	0	1	1	1.27E-02	9.76E+00	0.000	9.760	9.760	0.31	3.03	0.14	0.55	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
Connectors	Accessible	2	6	8	6.35E-04	1.37E+00	0.001	8.220	8.221	0.31	2.55	0.12	0.47	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
Flanges	Accessible	1	0	1	1.48E-03	3.23E+00	0.001	0.000	0.001	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
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
Pump Seals/ Compressor 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
	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		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		
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/ Compressor 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
	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		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		

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.