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

Rule _ /ork Order _	119891	Permit None Type Prev	untative	Cell (805)	tay1010	SO	con ws	Start " End	0:00	Am	Reinspection Page		of Y
		ma	aintenance									,	1
Metal Tag	Green Tag Number	Area	Subarea	Location	Componen	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
		Well Buy	B-46	AGCE	Nipple	2	TL	7:03	14100	_		-	_
escription:	reading	at also	ve grow	rd courses	v last		thre	ndo	1 00	nneed	06		
	0		7,00				+ * * * *	- Luce		Add September 1			
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	_	Well Bay	B-46	AGCNW	Ram	II	TL	7:06	17200	-	A STATE OF THE STA		
									1				
escription : V	andina	at ala	7160 0141	101 000	101-1	101	all	110	at LAI	2 VAIA	1 mm	411	Mros
escription :	reading	at ah	ove grou	ind cen	ter 1	101	44	ue:	st top	rou		#4 nnec	three
	0	at ah	ove grow	ind cen	ter 1	VOI			,		CO	nnec	HON
Metal Tag	Green Tag Number	Area	OVE Grov Subarea	Location	Component		Leak Path	Leak Time	St top	Repair Type			
	Green Tag		/'	1			Leak	Leak	Leak	Repair	CO	Repair	Repair
Metal Tag	Green Tag Number	Area	Subarea B-39	Location AGCN	Component		Leak Path	Leak Time 7:74	Leak Rate	Repair Type	CO	Repair Rate	Repair
Metal Tag	Green Tag Number	Area	Subarea	Location	Component		Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Green Tag Number	Area	Subarea B-39	Location AGCN	Component	Size	Leak Path	Leak Time 7:74	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Metal Tag	Green Tag Number	Area Woll Bay at alave	Subarea B-39 Around Subarea	Location AGCN CENHEN N Location	Component Kan WMM Component	Size	Leak Path	Leak Time 7:Z4	Leak Rate 9440	Repair Type	RFR Nead od	Repair Rate Col	Repair Time
Metal Tag	Green Tag Number	Area Well Bay Area Well Bay	Subarea B-39 Subarea B-39	Location AGCN CENTER N Location AGCNW	Component Ran WHM Component Ram	Size Size	Leak Path TL D VO Leak Path TC	Leak Time 7:24 UU Leak Time 7:27	Leak Rate 94400 Leak Rate 94400	Repair Type	RFR Nead oa	Repair Rate CON Repair Rate	Repair Time
Metal Tag	Green Tag Number	Area Woll Bay at about	Subarea B-39 Around Subarea	Location AGCN CENHEN N Location	Component Ran WHM Component Ram	Size Size	Leak Path	Leak Time 7: Z4	Leak Rate 94400 Leak Rate 94400	Repair Type	RFR Nead od	Repair Rate CON Repair Rate	Repair Time
Metal Tag	Green Tag Number	Area Well Bay Area Well Bay	Subarea B-39 Subarea B-39	Location AGCN CENTER N Location AGCNW	Component Ran WHM Component Ram	Size Size	Leak Path TL Leak Path TL Leak Path TC Vest	Leak Time 7: Z\(\psi\) UU Leak Time 7:27 +0\(\psi\)	Leak Rate 99 400 Am +	Repair Type	RFR NEAD OCH RFR #44 +11	Repair Rate CON Repair Rate	Repair Time Repair Time Repair Time
Metal Tag escription : V	Green Tag Number	Area Well Bay Area Well Bay	Subarea B-39 Subarea B-39	Location AGCN CENTER N Location AGCNW	Component Ran WHM Component Ram	Size Size	Leak Path TL D VO Leak Path TC	Leak Time 7:24 UU Leak Time 7:27	Leak Rate 94400 Leak Rate 94400	Repair Type	RFR Nead oa	Repair Rate CON Repair Rate	Repair Time

Rule	Platforn 331 (1989)	Permit None Type Prev			Taylor +aglor		<u>G</u>) W		07073 [1:00]	I M	Repair Reinspection Page		1 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 Buy	B-30	AGW	Valve	2	VS	7.35	94600				
escription;	reading	est abou	Ve gran	nd we	st Va	In	S	ten	7				
	T					_						Tai-	Donale
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	AGCE	Ram	1	TC	7:38	1142	_		_	
escription :	reading	at abou	e grou	nd cent	er Ex	25+	to	ap no	W R	run H	4, Th	reade	d co
Metal Tag	Green Tag Number	Area Woll Bay	Subarea B-1 Je grove	Location AGE NO EAST	Component VMan HNVC	1	Leak Path	Leak Time 7:43	Leak Rate 21900	Repair Type	RFR	Repair Rate 121	Repair Time 10:05
Metal Tag	Number			Location AGE	Component	l ude	Path TC	Time 7:43	Leak Rate 21900	Repair Type	RFR	Repair Rate	Repair Time 10:05 Ful d
Metal Tag	lading	Woll Bay	B-1 le grovi	Location AGE M EAST	Component VMan +Mrea	l ude	Path TC	Time 7:43	Leak Rate 21900	Repair Type	rer Valve	Repair Rate	Repair Time
Metal Tag	Rumber Rading Green Tag Number	Woll Bay	B-(Subarea	Location AGE AGE Location	Component VMun HNVen Component	l ude	Path TC Leak Path	Time 7:43	Leak Rate 21900 OCH M	Repair Type	rer Valve	Repair Rate	Repair Time 10:05 Ful d
Metal Tag	Rumber Rading Green Tag Number	Well Bay Well Bay	B-(Subarea	Location AGE Location AGSW	Component VMun HNVen Component	l ude	Path TC Leak Path	Time 7:43	Leak Rate 21900 OCH IM Leak Rate 2087 SHUM	Repair Type ON Repair Type	rer Valve	Repair Rate 12{ MMI; Repair Rate	Repair Time 10:05 ful d
Metal Tag Description:	Rumber Rading Green Tag Number	Well Bay Well Bay	B-(Subarea	Location AGE Location AGSW	Component VMun HNVen Component	Size	Path TC Leak Path	Time 7:43	Leak Rate 21900 OCH IM	Repair Type	rer Valve	Repair Rate	Repair Time 10:05 Ful d
Metal Tag	Green Tag Number	Area Well Bay At about	B-1 Subarea B-15 Ve grov	Location AGE Location AGSW AGSW	Component VMAN HIVE Component VALVE M. WE	Size	Leak Path	Leak Time	Leak Rate 21900 0CH M Leak Rate 2087 S+UM	Repair Type CON Repair Type Repair Type	RFR Valve	Repair Rate 124 MM/2 Repair Rate	Repair Time 10:05 FUL A Repair Time

Facility Rule Work Order	Platforn 331 119891	Permit None Type Pres	ventative	Cell (805) 4	taylore	ben		TVA 2	lena Car 1000 73 10:00 A		Repair Reinspection Page	8/28 Lui 	14
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	-	Well Buy	B-33	AGINW	Ram	1	TU	8:50	95800				
escription:		at above o	tround ce	nter Noval	West	-the	radiz		nection		ow fair	Repair	Repair
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Rate	Time
				MACCE	0	1		0-1	14.000				
escription : V	eading	Mell Bay	ground a	AGUSE CONTUR SI	Rum uth eas	34.	thre	854 adso	1 conn	ation	HOP VO		
escription : y	Green Tag Number	Area Woll Bay	ground (Subarea B-19	Location AGCV	Component Valve	Size	Leak Path	Leak Time		Repair Type	refr	N Rayalr Repair Rate	Repair Time
Metal Tag	Green Tag	Area Area	qwwd (Location AGCV	Component Valve	Size	Hnre Leak Path	Leak Time	Conn Leak Rate	Repair	,	Repair	Repair
Metal Tag	Green Tag Number	Area Woll Bay	ground (Subarea B-19	Location AGCV	Component Valve	Size 3	Leak Path	Leak Time	Conn Leak Rate	Repair	,	Repair	Repair Time
Metal Tag	Green Tag Number	Area Woll Bay at alan	Subarea B-19 2 grand	Location AGCN CONTURN	Component Valve	Size 3	Leak Path VS	Leak Time 9:14	Leak Rate	Repair Type Repair Type	RFR	Repair Rate	Repair Time
Metal Tag scription: Y	Green Tag Number	Area Woll Bay at alan	Subarea B-19 2 grand Subarea	Location AGCN CONTUN Location	Component Valve Component	Size 3	Leak Path VS Str	Leak Time 9:14	Leak Rate	Repair Type Repair Type	RFR	Repair Rate	Repair Time
Metal Tag	Green Tag Number	Area Woll Bay at alan	Subarea B-19 2 grand Subarea	Location AGCN CONTUN Location AGW Wast	Component Valve Component	Size 3 3 Size	Leak Path VS Str	Leak Time 9:14	Leak Rate Leak Rate Leak Rate	Repair Type Repair Type	RFR	Repair Rate	Repair Time

Kule _	Beacon Platform 331 119891	West En Houch! Permit None Type Press	ergy Gra n ientative aintenance	Contact Day Office devd Cell (805)	Reading I	- og - sb	Ins	TVA	Iluia Ce 10007	andena AM	Travel Repair Reinspection Page	77	of 4
Metal Tag	Green Tag Number	Area Well Bay	Subarea	Location AGCSW	Componen	1	Lask	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repai
Description:	reading	g at alc	ove grow	1		04	n u	NIST		radeo	conn	ecti	on
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:													
Metal Tag	Green Tag Number	Area Woll Bay	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Metal Tag		Area Woll Bay	Subarea	Location	Component	Size					RFR		
Metal Tag			Subarea	Location	Component	Size					RFR		
	Number Green Tag Number	Woll Bay	Subarea	Location	Component						RFR		
Metal Tag Description :	Number Green Tag Number	Woll Bay					Path	Time	Rate	Type		Rate	Time
Metal Tag Description : Metal Tag	Number Green Tag Number	Woll Bay					Path	Time	Rate	Type		Rate	Time
Metal Tag Description : Metal Tag	Number Green Tag Number	Woll Bay				Size	Path	Time	Rate	Type		Rate	Time

Attachment B Platform Houchin - Fugitive ROC Emissions Information August 2024

Table 5.1.0 Platform Houchin Fugitive ROC Emissions Information^(a)

August 2	024
----------	-----

Service Type	Accessibility	Num	nber of Co	mponents	SVRFs ^{(c}	of THC	THC Er	nissions b	y SVRF	ROC/THC	Tota	I ROC Em	nissisons ^(d)	S	/RFs fo	or ROC
Component Type	Group		Screene	ed ^(b)	lb/coi	mp/day	Range	, and Total	, lb/day	Ratio					b/com	p/day
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	<1)K	≥ 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		4E-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	5.7	4E-04	2.27E+00
							0.000	0.000	0.000						.=	
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		4E-03	3.03E+00
	Inaccessible	U		0	1.27E-02	9.76E+00	0.000	0.000	0.000 0.000	0.31	0.00	0.00	0.00	3.9	4E-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 9	7E-04	4.25E-01
Commodere	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		7E-04	4.25E-01
							0.000	0.000	0.000							
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.5	9E-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	4.5	9E-04	1.00E+00
							0.000	0.000	0.000							
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		4E-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	3.9	4E-04	8.99E-01
December On alla!	A : !- ! -	_	0		0.075.00	0.005.00	0.000	0.000	0.000	0.04	0.00	0.00	0.00	0.5	n= 00	4.405.00
Pump Seals/	Accessible Inaccessible	0	0	0	3.07E-02 3.07E-02	3.80E+00 3.80E+00	0.000	0.000	0.000 0.000	0.31 0.31	0.00 0.00	0.00	0.00		2E-03 2E-03	1.18E+00 1.18E+00
Compressor Seals	maccessible	U	U	U	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.5	2E-U3	1.18⊑+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		6E-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	5.6	6E-04	2.09E+00
C.I.					0.505.00	5 005 04	0.000	0.000	0.000	0.50	0.00	0.00	2.22		o= 00	0.005.04
Others	Accessible Inaccessible	0	0	0	8.50E-03 8.50E-03	5.03E-01 5.03E-01	0.000	0.000	0.000 0.000	0.56 0.56	0.00 0.00	0.00	0.00 0.00		6E-03 6E-03	2.82E-01 2.82E-01
	maccessible	U	U	U	0.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.7	0⊏-03	2.02⊑-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	29	6E-04	6.94E-01
Commodere	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		6E-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	7.1	1E-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	7.1	1E-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		3E-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	5.3	3E-04	6.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.4	4E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03 7.40E-03	3.80E+00 3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		+E-03 4E-03	2.13E+00 2.13E+00
Compressor Cears	maccessible				7. 4 0L-03	3.00∟ 100	0.000	0.000	0.000	0.50	0.00	0.00	0.00	4.1	-L-03	∠.13∟100
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	Accessibility	Num		mponents	SVRFs ^{(c}	or THC	THC Emissions by SVRF			ROC/THC	Total ROC Emissison		iissisons ^(d)
Component Type	Group		Screene	ed ^(b)	lb/cor	mp/day	Range,	, and Total	, lb/day	Ratio			
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy
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
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
0.11		_			4.075.00	0.705.00	0.000	0.000	0.000	0.04	0.00	0.00	0.00
Others	Accessible Inaccessible	0	0	0	1.27E-02	9.76E+00 9.76E+00	0.000 0.000	0.000	0.000	0.31 0.31	0.00 0.00	0.00	0.00 0.00
	inaccessible	0		0	1.27E-02	9.76⊑+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.000	12.330	12.332	0.31	3.82	0.17	0.70
Connectors	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.002	0.000	0.000	0.31	0.00	0.00	0.00
		_		-			0.000	0.000	0.000				5.55
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
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
							0.000	0.000	0.000				
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
		_	_	_			0.000	0.000	0.000				
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
04	A !!-! -	_		0	0.505.00	5 00E 04	0.000	0.000	0.000	0.50	0.00	0.00	0.00
Others	Accessible Inaccessible	0 0	0	0 0	8.50E-03 8.50E-03	5.03E-01 5.03E-01	0.000 0.000	0.000	0.000 0.000	0.56 0.56	0.00 0.00	0.00	0.00 0.00
	maccessible	U	0	U	0.50⊑-05	3.03E-01	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Dump Social	Apacasible	_			7 405 00	2 005 .00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0 0	7.40E-03 7.40E-03	3.80E+00 3.80E+00	0.000 0.000	0.000	0.000	0.56	0.00	0.00	0.00 0.00
Compressor Seals	Inaccessible	U	"	U	7.40⊑-03	ა.ი∪⊑+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Subtotal: Oil		0	0	0			0.00	0.00	0.00		0.00	0.00	0.00
T. () () () () ()			40	4.0				24.05	24.05		40.01		4.04
Total: Gas/LL + Oil		4	12	16			0.0038	34.32	34.32		10.64	0.49	1.94

	SVRFs f	or ROC
	lb/com	p/day
	<10K	≥ 10K
	5.74E-04 5.74E-04	2.27E+00 2.27E+00
	3.94E-03 3.94E-03	3.03E+00 3.03E+00
	1.97E-04 1.97E-04	4.25E-01 4.25E-01
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
	9.52E-03 9.52E-03	1.18E+00 1.18E+00
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
	4.76E-03 4.76E-03	
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
	5.33E-04 5.33E-04	
	4.14E-03 4.14E-03	2.13E+00 2.13E+00
		<u> </u>

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	Accessibility	Num	ber of Co	mponents	SVRFs ⁽	c) for THC	THC Er	nissions b	y SVRF	ROC/THC	Tota	al ROC En	nissisons ^(d)	l [SVRFs fo	or ROC
Component Type	Group		Screen	ed ^(b)	lb/co	mp/day	Range	, and Total	l, lb/day	Ratio					lb/com	p/day
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy	1 F	<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	0.31	0.00	0.00	0.00		5.74E-04	2.27E+00
							0.000	0.000	0.000							
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	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	0.000 0.002	12.330	12.332	0.31	3.82	0.17	0.70		1.97E-04	4.25E-01
Connectors	Inaccessible	0	0	0	6.35E-04	1.37E+00 1.37E+00	0.002	0.000	0.000	0.31	0.00	0.17	0.70		1.97E-04 1.97E-04	4.25E-01
	maccessible	· ·	0		0.33L-04	1.57 £ 100	0.000	0.000	0.000	0.51	0.00	0.00	0.00		1.37 L-04	4.20L-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
							0.000	0.000	0.000							
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		3.94E-04	8.99E-01
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		3.94E-04	8.99E-01
							0.000	0.000	0.000							
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		9.52E-03	1.18E+00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		9.52E-03	1.18E+00
Subtotal: Gas/LL		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 0.56	0.00	0.00	0.00		4.76E-03	2.82E-01 2.82E-01
	Inaccessible	U	U	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
Commodors	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
	maddddalaid			Ŭ	0.202 01	1.212.00	0.000	0.000	0.000	0.00	0.00	0.00	0.00		2.002 01	0.012 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
Duman Carlat	A ibi				7.405.00	0.005.00	0.000	0.000	0.000	0.50	0.00	0.00	0.00		4.445.60	0.405 / 00
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		4.14E-03	2.13E+00
Compressor Seals	Inaccessible	U	U	"	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] <u>[</u>		

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	Accessibility	Num	ber of Co	mponents	SVRFs ^{(c}	of the	THC Er	missions b	y SVRF	ROC/THC	Tota	I ROC Em	nissisons ^(d)	SVRFs	for ROC
Component Type	Group		Screene	ed ^(b)	lb/cor	np/day	Range	, and Total	, Ib/day	Ratio				lb/cor	np/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	
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	5.74E-04	2.27E+00
0.11					4.075.00	0.705.00	0.000	0.000	0.000	0.04	0.00	0.00	0.00	0.045.00	0.005.00
Others	Accessible	0	0	0 0	1.27E-02	9.76E+00 9.76E+00	0.000	0.000	0.000	0.31 0.31	0.00	0.00	0.00 0.00	3.94E-03 3.94E-03	
	Inaccessible	U		U	1.27E-02	9.76⊑+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94⊑-03	3.03E+00
Connectors	Accessible	3	9	12	6.35E-04	1.37E+00	0.000	12.330	12.332	0.31	3.82	0.17	0.70	1.97E-04	4.25E-01
Commediate	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.002	0.000	0.000	0.31	0.00	0.00	0.00	1.97E-04	
							0.000	0.000	0.000					1	
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	4.59E-04	1.00E+00
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	3.94E-04	8.99E-01
		_					0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00	9.52E-03	1.18E+00
Subtotal: Gas/LL		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	
	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
Others	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	
		ŭ		Ū	0.002 00	0.002 0.	0.000	0.000	0.000	0.00	0.00	0.00	0.00	02 00	2.022 0.
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	
	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
Onen anded Lines	Annanible	0		0	0.505.04	4 475 .00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	E 22E 04	0 EEE 04
Open-ended Lines	Accessible	0	0	0 0	9.52E-04 9.52E-04	1.17E+00	0.000	0.000 0.000	0.000	0.56 0.56	0.00	0.00	0.00	5.33E-04	6.55E-01 6.55E-01
	Inaccessible	U	U	U	9.52⊑-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	5.33E-04	0.55E-01
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	2.13E+00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00	4.14E-03	
·															
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		
rotai. Gas/LL · Oil			14	10	<u> </u>		0.0030	37.32	37.32	<u> </u>	10.04	0.43	1.34		

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

Rea	ding	Log
	9	9

Facility HOULDY Rule 331 Permit None Work Order 122231 Type Cell Stat 600 Facility HOULDY Work Order 122231 Type Cell Stat 600 Facility HOULDY Reinspection Page 1 of Page 1 of Page 1 of Reinspection Page 1 of P	Client)	Beacon	West		Gate			Inspec	ctor 3	auter Pan	ree	Date Travel	12/23 Lui	
Work Order 122.31 Type Cell End 4:30 Page 1 of	Facility 1	toucion						-	TVA ZO	20-02	-			1021
Work Order 122.31 Type Cell End 4:30 Page 1 of		331	Permit None				140	s	tart	800	7.			STORES.
Metal Tag Green Tag Number Area Subarea Location Component Size Leak Leak Repair Type RFR Rate Type Type Type Type Type Type Type Type Type	Work Order	22231			Cell				End 0	:50		Page	1 0	of 2
Number N			Ø,	1										
Metal Tag Green Tag Area Subarea Location Component Size Leak Time Rate Type RFR Repair Frequency Repair Rep	Metal Tag		Area	Subarea	1.0 2.1.2 (2.1.2.2)	Component	Size	Leak Path		Rate	Repair Type	RFR	Repair Rate	Repair Time
Metal Tag Green Tag Area Subarea Location Component Size Leak Time Rate Type RFR Repair Frequency Repair Repair Rate Repair				30	Fast :	Roms				5%	4		1	
Metal Tag Green Tag Area Subarea Location Component Size Path Time Rate Type RFR Repair Type RFR Repair Type RFR Rate Type RFR Type RFR Type	Description:				•				1		365			
Metal Tag Green Tag Area Subarea Location Component Size Path Time Rate Type RFR Repair Type RFR Repair Type RFR Rate Type RFR Type RFR Type								/ :	S.			,	1	
Metal Tag Green Tag Area Subarea Location Component Size Leak Leak Repair Time Rate Type RFR Rate Type RTER Type Type Type Type Type Type Type Type Type T	Metal Tag	Green Tag Number	Area	Subarea		Component	Size					RFR		Repair Time
Metal Tag Green Tag Area Subarea Location Component Size Leak Path Time Rate Type RFR Repair Type RFR Repair Rate Type RFR Repair Rate Repair Repa				30	East	19149	No.	権		2.5%	*	13.		
Metal Tag Green Tag Area Subarea Location Component Size Leak Leak Repair Type RFR Rate Type RFR Rate Type RFR Repair Rate Repair Rate Repair Repa	Description:									and in				
Metal Tag Green Tag Area Subarea Location Component Size Path Time Rate Type RFR Rate Metal Tag Green Tag Number Area Subarea Location Component Size Leak Path Time Rate Type RFR Rate Type RFR Repair			*				į		4 106					
Description: Metal Tag Green Tag Area Subarea Location Component Size Leak Leak Repair Type RFR Rate Type RFR Type RFR Type RFR Type RFR Type RFR Type Type RFR Type	Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size					RFR		Repair
Metal Tag Green Tag Number Area Subarea Location Component Size Leak Path Time Rate Type RFR Rate Subarea Location Component Size Path Time Rate Type RFR Rate Subarea Location Component Size Repair Type RFR Rate Subarea Location Component Size Repair Type RFR Repair Rate Subarea Location Component Size Repair Type RFR Rate Subarea Repair Type RFR Repair Rate Subarea Repair Type RFR Rate Subarea				B-3	HG3 West					1.574.				
Metal Tag Number Area Subarea Location Component Size Path Time Rate Type RFR Rate Metal Tag Green Tag Number Area Subarea Location Component Size Leak Rate Type RFR Rate Time Rate Type RFR Repair RFR Rate Type RFR Rate Time Rate Type RFR Repair RFR Rate Type RFR Rate Repair REPAIR Rate Repair REPAIR RATE	Description:	-						2. ^A					-	
Metal Tag Number Area Subarea Location Component Size Path Time Rate Type RFR Rate Metal Tag Green Tag Area Subarea Location Component Size Leak Rate Type RFR Rate Metal Tag Green Tag Number Area Subarea Location Component Size Path Time Rate Type RFR Rate Type RFR Repair RFR Rate Type RFR Rate Repair RFR Rate Repair REPAIR RATE RAT	1 = 1	1,500)											
Metal Tag Green Tag Number Area Subarea Location Component Size Leak Path Time Rate Type RFR Rate State Play State State State Play State Sta	Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size				Repair Type	RFR		Repair Time
Metal Tag Green Tag Number Area Subarea Location Component Size Leak Path Time Rate Type RFR Rate		Alers.		15	FAST	vaive		2		1200				
Number Number Alea Subarea Education Componentsize Path Time Rate Type RTR Rate 15 42 P(49 1520	Description :					11-11-14					19.0		THE STATE	
Number Number Subarea Education Componentsize Path Time Rate Type RTR Rate 15 42 P(49 1520							Yali					1 6.0		
15 A2 Pluy 1520	Metal Tag		Area	Subarea	Location	Componen	Size					RFR		Repair Time
				12	A9 Est	Plug				1580				Carl.
Description;	Description ;								1.146.1		1	100		

PREPARED BY MONTROSE AIR QUALITY SERVICES



Facility	toucion	24		Gate	eading Lo		Inspec	tor S	WHY RO	mireë	Date Travel Repair	12/25 Lun	/LH ch
Rule	331	Permit No	ine	Office	S. Maria		9	tart 5	00	R	einspection		175
Work Order 1	22231	Type _	١٩	Cell				End 9	50		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 D	B-39	Ay	Ram				MARC IT				
Description:								1250	201	194	- 26		
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	49	Ram				10,000				
Description :													
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Number			The second second			raui	1 (ime	Kate	Туре		Nate	tune
Description :	1-				-1								
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak	Leak Rate	Repair Type	RFR	Repair	Repair Time
Description :			<u> </u>		1000							A STAN	
		X											
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair
					X.								
escription:	57 Sept. 14 Discussion												

PREPARED BY MONTROSE AIR QUALITY SERVICES

~	ne	ina	Log
10	au	шч	LUY
		_	•

											1 100	151521	
Client	BEAREN	WEST		Gate					125/350 W	us	Travel	A A STATE	ch
Facility	However			Contact					20-54				
Rule	331	Permit Nor	18				SI		:00 MM		Reinspection_		
Work Order	122231	Туре	QY	Cell			_ =	ind •	1:50 AM		Page_	of	' <u> </u>
	Green Tag		Subarea	Location	Component	Size	Leak	Leak	Leak	Repair	RFR	Repair	Repair
Metal Tag	Number	Area	Subarea	1	остронен	-	Path	Time	Rate	Туре		Rate	Time
17.7-		÷.	B-34	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	MORTHEAST	Pump				9.1%				
Description:							1						
		income very			March 1								14 74 7 9
							4						
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
			13-33	GAST	12000				2.35%			4-17	
Description :						par Cal	and the						
										1			
Metal Tag	Green Tag Number	Area	Subarea	Location	Componen	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair	Repair
			B-33	WEST	1240	4		13.7	3.19%		147		
Description :					-				THE STATE OF	pro-			
										into a faz.	5 (50)	746	
Metal Tag	Green Tag Number	Area	Subarea	Location	Componer	tSize	Leak Path	Leak Time	Leak Rate	Repair	RFR	Repair	Repair
	Humbel					1	Faun	Time	Nate	3	18,000	Kata	-
Description :	1	I				1					1		1.
1		New York Control	SCHOOL STATE		and the same of th		2.754	4 -				The Control of the Control	

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)

_ n	-		ah	~	. 21	024
···	·υ	eп	III	чı	- 21	J 24

Service Type	Accessibility	Number of Components		SVRFs ^(c) for THC		THC Emissions by SVRF			ROC/THC	Total ROC Emissisons ^(d)			
Component Type	Group	Screened ^(b)		lb/cor	mp/day	Range, and Total, lb/day		Ratio					
		<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		7.330	7.332	0.31	2.27	0.10	0.41
	Inaccessible	0	0	0	1.85E-03	7.33E+00		0.000	0.000	0.31	0.00	0.00	0.00
					4 075 00	0.705.00	0.000	0.000	0.000	0.04	0.00		0.00
Others	Accessible	0	0	0	1.27E-02	9.76E+00		0.000	0.000	0.31	0.00	0.00	0.00
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000 0.000	0.000 0.000	0.000 0.000	0.31	0.00	0.00	0.00
Connectors	Accessible	3	6	9	6.35E-04	1.37E+00		8.220	8.222	0.31	2.55	0.12	0.47
Connectors	Inaccessible	0	0	0	6.35E-04	1.37E+00		0.000	0.000	0.31	0.00	0.12	0.00
	maccessible	U	0	O	0.552-04	1.37 £ 100	0.000	0.000	0.000	0.51	0.00	0.00	0.00
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00		0.000	0.000	0.31	0.00	0.00	0.00
3	Inaccessible	0	0	0	1.48E-03	3.23E+00		0.000	0.000	0.31	0.00	0.00	0.00
							0.000	0.000	0.000				
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
							0.000	0.000	0.000				
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00		0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
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	0.56	0.00	0.00	0.00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
					0.505.00	5.005.04		0.000		0.50	0.00		0.00
Others	Accessible	0	0	0 0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	Inaccessible	0	0	U	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
Connectors	Inaccessible	0	0	0	5.29E-04	1.24E+00		0.000	0.000	0.56	0.00	0.00	0.00
	massasis.s	Ĭ		ŭ	0.202 0.		0.000	0.000	0.000	0.00	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
										I			
Open-ended Lines	Accessible	0	0	0	9.52E-04	1.17E+00		0.000	0.000	0.56	0.00	0.00	0.00
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
		_	_	_									
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00		0.000	0.000	0.56	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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

1	SVRFs for ROC								
╛	lb/comp/day								
4	<10K	≥ 10K							
		2.27E+00							
	3.94E-03 3.94E-03	3.03E+00 3.03E+00							
	1.97E-04 1.97E-04								
	4.59E-04 4.59E-04	1.00E+00 1.00E+00							
	3.94E-04 3.94E-04	8.99E-01 8.99E-01							
	9.52E-03 9.52E-03	1.18E+00 1.18E+00							
	5.66E-04	2.09E+00							
		2.09E+00							
	4.76E-03 4.76E-03	2.82E-01 2.82E-01							
	2.96E-04 2.96E-04	6.94E-01 6.94E-01							
	7.11E-04 7.11E-04	7.73E+00 7.73E+00							
	5.33E-04 5.33E-04	6.55E-01 6.55E-01							
	4.14E-03 4.14E-03	2.13E+00 2.13E+00							

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.

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	Accessibility Number of Components SVRFs ^(c) f		of THC	THC Er	nissions b	y SVRF	ROC/THC	Total ROC Emissisons ^(d)					
Component Type	Group		Screene			lb/comp/day		Range, and Total, lb/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
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
			_	_	l		0.000	0.000	0.000				
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
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compostoro	Accesible	,		0	6.35E-04	1.37E+00	0.000	0.000 8.220	0.000 8.222	0.31	2.55	0.40	0.47
Connectors	Accessible	3 0	6 0	9 0	6.35E-04 6.35E-04	1.37E+00 1.37E+00	0.002 0.000	0.000	0.000	0.31	0.00	0.12 0.00	0.47
	Inaccessible	U	0	U	0.33E-04	1.37 ⊑ ₹00	0.000	0.000	0.000	0.51	0.00	0.00	0.00
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
l laliges	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
	Indoocssible			O	1.402-00	0.202.00	0.000	0.000	0.000	0.01	0.00	0.00	0.00
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
open ended Emes	Inaccessible	ő	ő	Ö	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
		•					0.000	0.000	0.000				
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
045	A !In I -			0	0.505.00	E 00E 04	0.000	0.000	0.000	0.50	0.00	0.00	0.00
Others	Accessible Inaccessible	0	0	0 0	8.50E-03 8.50E-03	5.03E-01 5.03E-01	0.000 0.000	0.000 0.000	0.000 0.000	0.56 0.56	0.00 0.00	0.00	0.00 0.00
	inaccessible	U	0	U	0.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
Connectors	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	Indoocssible			O	0.232-04	1.242.00	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
ľ	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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

7	SVRFs	for ROC
┙		np/day
4	<10K	≥ 10K
	5.74E-04 5.74E-04	2.27E+00 2.27E+00
	3.94E-03 3.94E-03	3.03E+00 3.03E+00
	1.97E-04 1.97E-04	
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
	9.52E-03 9.52E-03	
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
	4.76E-03 4.76E-03	
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
	5.33E-04 5.33E-04	6.55E-01 6.55E-01
	4.14E-03 4.14E-03	2.13E+00 2.13E+00

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.

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	Accessibility Number of Components SVRFs ^(c) for THC		or THC	THC E	nissions b	y SVRF	ROC/THC	Total ROC Emissisons ^(d)					
Component Type	Group		Screene	∍d ^(b)	lb/comp/day		Range, and Total, lb/day			Ratio			
		<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
	Inaccessible	0	0	0	1.85E-03	7.33E+00		0.000	0.000	0.31	0.00	0.00	0.00
							0.000	0.000	0.000				
Others	Accessible	0	0	0	1.27E-02	9.76E+00		0.000	0.000	0.31	0.00	0.00	0.00
	Inaccessible	0	0	0	1.27E-02	9.76E+00		0.000	0.000	0.31	0.00	0.00	0.00
		_	_	_			0.000	0.000	0.000	l			
Connectors	Accessible	3	6	9	6.35E-04	1.37E+00		8.220	8.222	0.31	2.55	0.12	0.47
	Inaccessible	0	0	0	6.35E-04	1.37E+00		0.000	0.000	0.31	0.00	0.00	0.00
				•	4 405 00	0.005.00	0.000	0.000	0.000	0.04	0.00		0.00
Flanges	Accessible	0	0	0	1.48E-03	3.23E+00		0.000	0.000	0.31	0.00	0.00	0.00
	Inaccessible	0	U	0	1.48E-03	3.23E+00		0.000	0.000	0.31	0.00	0.00	0.00
Onen anded Lines	Aaaaaibla	0	_	0	4 275 02	2.005.00	0.000	0.000	0.000	0.24	0.00	0.00	0.00
Open-ended Lines	Accessible Inaccessible	0	0	0 0	1.27E-03 1.27E-03	2.90E+00 2.90E+00		0.000 0.000	0.000	0.31 0.31	0.00 0.00	0.00 0.00	0.00 0.00
	maccessible	U	U	U	1.27 E-03	2.90⊑+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00		0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00		0.000	0.000	0.31	0.00	0.00	0.00
Compressor Cears	indoccoolbic			O	0.07 L-02	0.002.00	0.000	0.000	0.000	0.01	0.00	0.00	0.00
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	0.56	0.00	0.00	0.00
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
		_	_	_	l .		l						
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
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Commontore	Accessible	_	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Connectors	Inaccessible	0 0	0	0 0	5.29E-04 5.29E-04	1.24E+00 1.24E+00		0.000	0.000	0.56	0.00	0.00	0.00
	maccessible	U	U	U	3.29E-04	1.246+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
i langes	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	illaccessible	U	0	O	1.27 L-03	1.502.01	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
5.1.454 E.1.155	Inaccessible	0	0	0	9.52E-04	1.17E+00		0.000	0.000	0.56	0.00	0.00	0.00
		Ĭ		ŭ	5.522 6 1		""	0.000	0.000	0.00	"""	0.00	0.00
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00		0.000	0.000	0.56	0.00	0.00	0.00
·													
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

	SVRFs fo	or ROC
	lb/com	<u> </u>
	<10K	≥ 10K
	5.74E-04 5.74E-04	2.27E+00 2.27E+00
		3.03E+00 3.03E+00
	1.97E-04 1.97E-04	4.25E-01 4.25E-01
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
		1.18E+00 1.18E+00
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
	4.76E-03 4.76E-03	
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
	5.33E-04 5.33E-04	6.55E-01 6.55E-01
		2.13E+00 2.13E+00

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.

Reading Log

				I C	ading L	Jy					Date	3-11-2	5
							Inspe	ctor -	الادعده لا		Travel	Lun	ch
Client B	EACON WE	ST ENERLY	GROUR	Contact Dough				TVA —	10-54	rs .			
Facility 7	PUATFORM	HOUCHW '		Contact Douch	H TAYLOR		- ,				Reinspection_		
Rule	331	Permit None		Ouice Donnin:	TAYUREBE	AKON.	.Com	End	1:00 AM		Page	1_ of	3
Vork Order	124250	Type 725	JENTATIVE INTENANCE	Contact Doublet Office Doublet Cell 1805)	155-9450)	_						
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
_	(tumber	BAY	1346	AG	RAM	1"	TC	7:24	2.13%				
escription:													
													D la
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
_	- Wallinger	Well Bush Bay	13-39	46	Ram	1"	FL	7:30	3.46%				
escription :													
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Number	WELL	B15	AG	Plus	3/4"	TL	7:40	2400	_			
escription :									Α				
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Number	BAY	833	AGE	Ram	"	FL	7:47	1.89%	-			-
Description :		1547											
Coonparis													
Metal Tag	Green Tag	Area	Subarea	Location	Componen	Size	Leak Path	Leak Time	Leak Rate	Repair	RFR	Repair Rate	Repair Time
ivictal ray	Number	well	13-33	now	Ram	, "	TC	7:41	3.76%				_
		BAY				-							
Description :								D) //OFC					

Reading Log

				110	ading Lo	9					Date	3-11-25	-
							Inches	tor -	- 1			Lunc	
Client	bacon We	ST ENERGY HOULTW	(ANDUR	Gate				TVA	misso he	•5			
Facility 2	CATFORM	Houchw '		Contact Dough	TAYLOR		- 。	tart 1	070-54	-	Reinspection_		
Rule	331	Permit None	e	Office Double.	TAYLOR CB	DALON.	. com	End 6	00 Am	-	Page	2 of	3
Work Order	24356	Type The	VENTATIVE WITCHANCE	Contact Dough.	55-9450		-	ilu 🔩	geodis.	-	rage_		
Metal Tag	Green Tag	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
Wetai rug	Number	Merr				1	Mhe						—
	 	BAY	B-19	AG	MIVE	*	sre~	8:06	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
	Number	Well Bay	B-34	Δ6	Plus	3/4	pivy		1.2%				
Description :))		1						
- Coocinpinon (
				_	1		Look	Leak	Leak	Repair		Repair	Repair
Metal Tag	Green Tag Number	Area	Subarea	Location	Component		Path	Time	Rate	Туре	RFR	Rate	Time
		Well Bay	B-34	n 6	frange	6"	gasher		7,600				
Description :	7				9	,							
							Leak	Leak	Leak	Repair	DED	Repair	Repair
Metal Tag	Green Tag Number	Area	Subarea	Location	Component		Path	Time	Rate	Туре	RFR	Rate	Time
		Bay	B-34	A6	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
	Number	Bay	B-34	AG	East	3/4"	cup		1,600				
D. and attended													
Description :				DED DV MONTI	DOOF AID O		TV CE	DVICES					

Reading Log

					3	9					Date_	3-11-25	
. 0				0-1-			Inspec	tor 🖜	GOWEN A	2440	Travel_	Lune	ch
Client	DEALON WE	HOWHIN Permit None	THOUT	Gate			7	VA 70	20-66		Repair_		
Facility L	LATTORM_	HOWHIN		Contact Dovat	TAN UNG A B	14/11	, ,,,,, S	tart C	:00AM		Reinspection_		
		Permit None		Office Doxatt.	C- 01.50	.mu	E	nd			Page_	3 of	_3_
Vork Order _	24356	Type WAN	NTENANCE	(403) 4	05- 44 00								
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	A.G	6ate Valve	6"	stem		9pm 4,800				
escription:		134)											
Metal Tag	Green Tag	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair Time
	Number	Lalan Gan	0-30	A ₆	west	3/4"	cal		1.12%				
escription :		Wen Bay	0 50										
escription .													
				_		0:	Leak	Leak	Leak	Repair	RFR	Repair	Repair Time
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	19.0	Path	Time	Rate	Туре		Rate	Time
		Well Bay	B-30	46	Valve	6"	stem		1.2%				
escription :													
Metal Tag	Green Tag Number	Area	Subarea	Location	Component	Size	Leak Path	Leak Time	Leak Rate	Repair Type	RFR	Repair Rate	Repair
	Train 201												
Description :													
							1	Line	Leak	Repai	r	Repair	Repai
Metal Tag	Green Tag Number	Area	Subarea	Location	Componen	Size	Leak Path	Leak Time	Rate	Туре		Rate	Time
D													
Description :				DED BY MONT	DOSE AIR C	1141	ITY SE	RVICES	3				

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	Accessibility Number of Components SVRFs ^(c) for THC		^{c)} for THC	THC Er	nissions b	y SVRF	ROC/THC	Total ROC Emissisons ^(d)					
Component Type	Group		Screene		lb/cor	mp/day	Range	Range, and Total, lb/day					
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy
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
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
							0.000	0.000	0.000				
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
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
		_		_			0.000	0.000	0.000				
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
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Flance	A : I- I -	,	0		4 405 00	3.23E+00	0.000	0.000	0.000	0.04	0.00	0.00	0.00
Flanges	Accessible	1 0	0	1	1.48E-03		0.001 0.000	0.000	0.001	0.31	0.00	0.00	0.00
	Inaccessible	U	U	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
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
Open-ended Lines	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
	maccessible	U	U	U	1.27L-03	2.901+00	0.000	0.000	0.000	0.51	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor occis	maccessible	· ·	0	O	3.07 L 02	3.00E100	0.000	0.000	0.000	0.51	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
		_			5 005 04	4 0 4 5 0 0	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
rianges	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	illaccessible	U	U	O	1.27 L-03	1.302+01	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	111000001010	Ŭ		Ŭ	3.02L 04	11.17.2.700	0.000	0.000	0.000	0.00	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
•				-									
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

	SVRFs	for ROC
		np/day
	<10K	≥ 10K
	5.74E-04 5.74E-04	2.27E+00 2.27E+00
	3.94E-03 3.94E-03	3.03E+00 3.03E+00
	1.97E-04 1.97E-04	4.25E-01 4.25E-01
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
	9.52E-03 9.52E-03	1.18E+00 1.18E+00
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
	4.76E-03 4.76E-03	2.82E-01 2.82E-01
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
	5.33E-04 5.33E-04	6.55E-01 6.55E-01
		2.13E+00 2.13E+00
_		

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.

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	Accessibility	Num		mponents	SVRFs ^(c) for THC lb/comp/day			missions b	•	ROC/THC Total ROC Emis			nissisons ^(d)		
Component Type	Group		Screen				Ū	· · ·		je, and Total, lb/day		Ratio			
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy		
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		
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
							0.000	0.000	0.000						
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		
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
							0.000	0.000	0.000						
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		
	Inaccessible	0	0	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
							0.000	0.000	0.000						
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		
	Inaccessible	0	0	0	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
							0.000	0.000	0.000						
Open-ended Lines	Accessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
							0.000	0.000	0.000						
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00		
Subtotal: Gas/LL		5	8	13			0.0065	25.31	25.32		7.85	0.36	1.43		
0.00.00.00.00.00.00.00.00.00.00.00.00.0			-				0.0000					0.00			
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		
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
			_												
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		
	Inaccessible	0	0	0	8.50E-03		0.000	0.000	0.000	0.56	0.00	0.00	0.00		
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		
	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
			_												
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		
. 3	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
			_												
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		
•	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00		
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		

	SVRFs f	
	lb/com	
	<10K	≥ 10K
		2.27E+00 2.27E+00
	3.94E-03 3.94E-03	3.03E+00 3.03E+00
	1.97E-04 1.97E-04	4.25E-01 4.25E-01
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
	9.52E-03 9.52E-03	
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
	4.76E-03 4.76E-03	2.82E-01 2.82E-01
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
	5.33E-04 5.33E-04	
	4.14E-03 4.14E-03	2.13E+00 2.13E+00

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.

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	Accessibility Number of Components SVRFs ^(c) for		c) for THC	THC Er	nissions b	y SVRF	ROC/THC Total ROC Emissiso			nissisons ^(d)			
Component Type	Group		Screene	∍d ^(b)	lb/co	mp/day	Range	, and Total	, lb/day	Ratio			
		<10K	≥ 10K	Total	<10K	≥ 10K	<10K	≥ 10K	Total		lb/day	tpq	tpy
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
	Inaccessible	0	0	0	1.85E-03	7.33E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
<u>_</u>		_					0.000	0.000	0.000				
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
	Inaccessible	0	0	0	1.27E-02	9.76E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
0	A !I-1 -	_	0	0	0.055.04	4.075.00	0.000	0.000	0.000	0.04	0.55	0.40	0.47
Connectors	Accessible	2	6 0	8	6.35E-04	1.37E+00	0.001	8.220	8.221	0.31	2.55	0.12	0.47
	Inaccessible	0	U	0	6.35E-04	1.37E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Flanges	Accessible	1	0	1	1.48E-03	3.23E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
rianges	Inaccessible	0	0	0	1.48E-03	3.23E+00 3.23E+00	0.001	0.000	0.001	0.31	0.00	0.00	0.00
	maccessible	U	U	U	1.400-03	3.23E+00	0.000	0.000	0.000	0.51	0.00	0.00	0.00
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
Open-ended Lines	Inaccessible	0	0	0	1.27E-03	2.90E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
	maccessible	· ·		O	1.27 £ 00	2.502100	0.000	0.000	0.000	0.51	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	3.07E-02	3.80E+00	0.000	0.000	0.000	0.31	0.00	0.00	0.00
Compressor Could	maccoccibio			Ŭ	0.072 02	0.002100	0.000	0.000	0.000	0.01	0.00	0.00	0.00
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
	Inaccessible	0	0	0	1.01E-03	3.74E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	8.50E-03	5.03E-01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
Connectors	Inaccessible	0	0	0	5.29E-04	1.24E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
	maccessible			O	3.23L 04	1.242100	0.000	0.000	0.000	0.50	0.00	0.00	0.00
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
955	Inaccessible	0	0	0	1.27E-03	1.38E+01	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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
	Inaccessible	0	0	0	9.52E-04	1.17E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Pump Seals/	Accessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
Compressor Seals	Inaccessible	0	0	0	7.40E-03	3.80E+00	0.000	0.000	0.000	0.56	0.00	0.00	0.00
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

	SVRFs for ROC	
	lb/comp/day	
	<10K	≥ 10K
	5.74E-04 5.74E-04	2.27E+00 2.27E+00
	3.94E-03 3.94E-03	3.03E+00 3.03E+00
	1.97E-04 1.97E-04	4.25E-01 4.25E-01
	4.59E-04 4.59E-04	1.00E+00 1.00E+00
	3.94E-04 3.94E-04	8.99E-01 8.99E-01
		1.18E+00 1.18E+00
	5.66E-04 5.66E-04	2.09E+00 2.09E+00
		2.82E-01 2.82E-01
	2.96E-04 2.96E-04	6.94E-01 6.94E-01
	7.11E-04 7.11E-04	7.73E+00 7.73E+00
		6.55E-01 6.55E-01
	4.14E-03 4.14E-03	2.13E+00 2.13E+00

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.