



May 19, 2015

Mr. Dan Searcy
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

**Re: Part 70 Annual Compliance Certification Report for Platform Grace -
Reporting Period of April 1, 2014 through March 31, 2015**

Dear Mr. Searcy:

Pursuant to the requirements of the Title V Part 70 Federal Operating Permit No. 1493, Venoco, Inc. is submitting the Platform Grace Part 70 Annual Compliance Certification Report for the reporting period of April 1, 2014 through March 31, 2015.

If you have questions or need additional information, please call me at (805) 745-2264.

Sincerely,

Patrick T. Corcoran
Environmental Coordinator

Encl.

Cc: Gerardo Rios, U.S. EPA Region 9

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Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

<p>Signature and Title of Responsible Official:</p>  <p>Title:</p> <p>OPERATIONS MANAGER</p>	<p>Date:</p> <p>21-MAY-2015</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>04/01/2014</u> (MM/DD/YY) to <u>03/31/2015</u> (MM/DD/YY)</p>
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: <u>71.1N1</u></p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description: Tanks that are equipped with vapor recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the tank hatches and other inlet and outlet gas and liquid piping connections; storage tank vapor recovery system for each applicable tank is monitored on a quarterly basis. Annual compliance certification verifying tanks are equipped with vapor recovery.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>71.4N3</u></p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Sumps, pits, or ponds exempt from being required to have a cover which is impermeable to ROC vapors, and covers at least 90% of the liquid surface area; Low ROC exemption</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual validation/compliance certification that the tanks are exempt via independent laboratory analysis by EPA Method 8015 showing tank ROC content is < 5mg/l. See attached ROC analytical results for T-2 and T-13.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.9N3</u></p>	<p>D. Frequency of monitoring: Biennial Source Tests</p>
<p>B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – NO_x, ROC, and CO emission limits after January 1, 1997.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100, EPA Method 25</p>
<p>C. Method of monitoring: Biennial source test of the generator engines . Engine inspections per the Engine Operator Inspection Plan.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: <u>74.9N7</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records of operating hours. Date, time, duration, and reason for emergency operation. Records of engine data. Compliance is determined by logged hours of annual operation to ensure less than 50 hours per year.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.9N8</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Stationary diesel-fired internal combustion engines with permitted capacity factor of 15% or less.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records containing data for each engine verifying the manufacturer's specified maximum hourly fuel consumption, data specifying the actual annual usage (e.g., fuel consumption or operating hours), and data for each engine including the engine manufacturer, model no., operator identification no., and location of each engine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.9N9</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Stationary diesel-fired internal combustion engines used to power cranes and welding equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records containing data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine. Routine surveillance of the diesel-fired engine to ensure that compliance is being maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: ATCM ENG.N3</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>All stationary compression ignition engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Annual certification that monthly fuel consumption records and fuel type records are maintained. ATCM emission standards are not federally enforceable.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 1</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>Platform Grace Additional Requirements - 12-month rolling records of throughput and consumption as provided in the Permitted Throughput and Consumption Limits Table in Section No. 3 of the Permit.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Monthly records of throughputs and fuel consumption. Annual compliance certification that these records are maintained. See attached 12-Month Rolling data.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 2</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>Platform Grace Additional Requirements - Generators shall only burn natural gas and no other fuel.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Routine surveillance to ensure only natural gas is used. Annual compliance that only natural gas was burned in generators.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 3</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Maximum number of oil wells (16). Platform Grace currently has 11 oil well completions.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Authority to Construct will be obtained prior to drilling any wells, unless the activity is a redrill. Annual compliance certification that there was no increase in number of wells for this reporting period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Maximum sulfur content of diesel fuel consumed in the crane engines, C-5B turbine starter engines, Generators, backup generator engine, and the boats.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records of certifications from the fuel supplier documenting the sulfur content of each diesel fuel delivery are maintained</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 5</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Crew boat and work boat emission limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records of fuel consumption from the crew and work boats are maintained. Monthly emissions are calculated for the crew and work boats and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. See attached 12-month rolling data.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 6</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Crew boat permitted engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only one crew boat can be used at any given time. Records are maintained showing the days and hours that each crew boat was in service. Annual compliance certification that these records are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 7</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Work boat permitted engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only one work boat can be used at any given time. Records are maintained showing the days and hours that each work boat was in service. Annual compliance certification that these records are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 8</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Solvent Recordkeeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records of solvent purchase and usage, along with records of solvent that is recycled or disposed of are maintained for solvents used in solvent cleaning activities, including wipe cleaning. Annual compliance certification that these records are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: PO1493PC2-Conditions Nos. 1 and 4</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Flare fuel consumption</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Each flare has individual fuel meter installed to record the amount of natural gas consumed. Monthly records of volume of gas combusted in flare are maintained in 12-month rolling records. Records also differentiate between emergency (unplanned) usage and non-emergency (planned) usage. Annual compliance certification that these records are maintained. See attached 12-month rolling data.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC2-Conditions Nos. 2 and 3</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flare ignition system operation – each flare is equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Flare's ignition system is tested monthly and monthly records of the flare's ignition system tests and maintenance activities are maintained. Annual compliance certification that these records are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC3</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Caterpillar Diesel Backup Generator operation.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that the backup generator G-02 is only operated during maintenance testing or when production generators mechanically malfunctioning. Records indicating reason for usage are maintained. Annual compliance certification that records are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: PO1493PC4</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Tanks designated as out of service on the permit are shut down and cannot be operated.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that Tanks T-4, T-6, T-10, T-21A, T-21B, T-23, T-25, and T-22 have been shut down and had not been operated during this compliance period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC5</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO_x, ROC, and CO emission limits. CAM Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100, EPA Method 25</p>
<p>C. Method of monitoring: Biennial source test of the G-03 generator using: ARB Method 100 for NO_x, ARB Method 100 for CO, EPA Method 25 or EPA Method 18 for ROC, ARB Method 100 for oxygen content, and ASTM Method 1826-77 for gaseous fuel heating value. Annual compliance certification that daily NO_x measurements utilizing a portable analyzer are being recorded. The G-03 generator was taken out of service and was not source tested during the reporting period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC6</p>	<p>D. Frequency of monitoring: Annual</p>
<p>B. Description: Crane fuel consumption</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records of crane fuel consumption are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. See attached rolling 12-month data.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: 50</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Opacity requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance to ensure that opacity requirements are being maintained. Records including date, time, and identity of emissions unit of any occurrences of visible emissions not meeting Rule 50 opacity requirements are maintained. District notification within subsequent 24 hours if visible emissions problem cannot be corrected within first 24 hours.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 52</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Particulate Matter – Concentration requirements (grain loading)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that particulate matter was not discharged into the atmosphere from any source at the facility in excess of the concentration listed in the table shown in Rule 52. Periodic monitoring is not necessary to certify compliance.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 54.B.1 (OCS)</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Sulfur Compounds – Sulfur emission concentration requirements at point of discharge</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that records of each planned and unplanned flaring event are maintained. A representative fuel analysis is being maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: 54.B.2 (OCS)</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur Compounds – Sulfur emission concentration requirements at ground level</p>	<p>Periodic</p>
<p>C. Method of monitoring: Annual certification that records of each planned and unplanned flaring event are maintained. A representative fuel analysis is being maintained.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 57.1</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Combustion contaminants requirements – Specific – Fuel burning equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that combustion contaminants were not discharged into the atmosphere from any fuel-burning equipment at the facility in excess of the concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12% CO₂ at standard conditions.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 64.B.1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Gaseous fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting gaseous fuel.</p>	<p>Annually</p>
<p>C. Method of monitoring: Annual fuel analysis of the total sulfur content measured as hydrogen sulfide using SCAQMD Method 307-94.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>64.B.2</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Solid or liquid fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting solid or liquid fuel.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Fuel supplier's certifications containing fuel sulfur content by weight for each fuel delivery are maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>71.1.C</u></p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description: Emissions of produced gas must be controlled at all times using a gas collection system that directs all gas to a fuel or sales gas system, or to a flare that combusts ROCs.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the gas collection system's gas and liquid piping connections; Annual compliance certification that the produced gas collection system is a closed system through a visual inspection. Flare is inspected on a quarterly basis. Records of visual and flare inspections are maintained at the facility.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>71.4.B.1</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: First stage sump prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that there are no first stage production sumps at the facility.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: 71.4.B.3</p>	<p>D. Frequency of monitoring:</p> <p>None</p>
<p>B. Description:</p> <p>Well cellar storage prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Annual certification including routine surveillance and visual inspections that no crude oil or petroleum material was stored in a well cellar except during periods of equipment maintenance or well workover, and in no case, no storage for more than 5 days. No well cellars are on Platform Grace.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.6</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>Surface cleaning and degreasing requirements including ROC content limits, application and storage requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Records of current material list of ROC-containing material used in solvent cleaning activities are maintained. Routine surveillance of the applicable solvent cleaning activities is also performed.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.10</p>	<p>D. Frequency of monitoring:</p> <p>Daily, Weekly, Quarterly, Annually</p>
<p>B. Description:</p> <p>Fugitive leak and leak inspection requirements for components at crude oil production and processing facilities.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Weekly visual inspections of pumps, Daily, Weekly, Quarterly monitoring of specified components. All other components not exempt are monitored annually. Detected leaks are visibly tagged. Annual update to Operator Management Plan. Notification of major leaks and repeat leaks.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: <u>74.11.1</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that Platform Grace does not have any applicable units.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.22</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Natural gas-fired, fan-type central furnaces – NO_x limits and certification requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that Platform Grace does not have any applicable units.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.1</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Abrasive blasting requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance including assuring that visual inspections, operation, equipment and recordkeeping requirements are being met.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: <u>74.2</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Architectural coating requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance and records including specifying the usage of compliant coatings and maintaining VOC records of coatings used (MSDSs are maintained).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>74.16</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Oilfield Drilling Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification to ensure the use of electric power or that drilling engines have valid APCD PTO. Annual source tests or manufacturer certification.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>40CFR.61.M</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: National Emissions Standards for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that inspection procedures outlined in 40 CFR Part 61.145 are met.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: PO1493PC7</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO_x, ROC, and CO emission limits. CAM Requirements. G-6A, G-6B, G-6C, G-1A, G-1B.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Biennial source test of the generators using the following methods: ARB Method 100 for NO_x, ARB Method 100 for CO, EPA Method 25 or EPA Method 18 for ROC, ARB Method 100 for oxygen content, and ASTM Method 1826-77 for gaseous fuel heating value. Biennial source test also to obtain air to fuel ratio set point. Annual compliance certification that daily NO_x measurements utilizing a portable analyzer are being recorded.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR63ZZZN3</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>RICE MACT for emergency diesel engines – oil change and inspections. Applies to 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02) and 120 BHP Detroit Diesel Emergency Firewater Pump Engine (P-19)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Maintain maintenance records, use of non-resettable hour meter. Annual compliance certification that maintenance records are maintained and that non-resettable hour meter is in use.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR63ZZZN4</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</p>
<p>B. Description:</p> <p>RICE MACT for non- emergency diesel engines less than or equal to 300 HP – oil change and inspections. Applies to North and South Crane Diesel Engines.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Maintain maintenance records. Annual compliance certification that maintenance records are maintained..</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 14 to 03 / 31 / 15

<p>A. Attachment # or Permit Condition #: 40CFR63ZZZN7</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: RICE MACT for spark ignited remote engines greater than 500 HP – oil change and inspections. Applies to G-1 series and G-6 series generator engines.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Maintain maintenance records. Annual compliance certification that maintenance records are maintained..</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO1493PC8</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: VCAPCD Rules 29 and 71.4 – Drain Pit Operation. Applies to 7.07 sqft Deck Drain Pit.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that the deck drain pit is being used as a containment berm.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 2014 (MM/DD/YY) to 03 / 31 / 2015 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p>74.10</p>	<p>B. Equipment description:</p> <p>Various leaking components. NTC #11347 issued.</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin: _____</p> <p>End: _____</p> <p>When Discovered: Date & Time</p> <p>05/29/24</p>
<p>D. Parameters monitored:</p> <p>ROC</p>	<p>E. Limit:</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation:</p> <p>Leaking components found during VCAPCD inspection</p>		<p>H. Corrective actions taken:</p> <p>Components repaired to non-leaking status. VCAPCD inspector verified repair.</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin: _____</p> <p>End: _____</p> <p>When Discovered: Date & Time</p> <p>_____</p>
<p>D. Parameters monitored:</p>	<p>E. Limit:</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation:</p>		<p>H. Corrective actions taken:</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin: _____</p> <p>End: _____</p> <p>When Discovered: Date & Time</p> <p>_____</p>
<p>D. Parameters monitored:</p>	<p>E. Limit:</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation:</p>		<p>H. Corrective actions taken:</p>



ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 14 (MM/DD/YY) to 03 / 31 / 15 (MM/DD/YY)

A. Emission Unit Description: Generator G-1A			B. Pollutant: NOX
C. Measured Emission Rate: 1.8 ppmv @ 15% O2	D. Limited Emission Rate: 5 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012 Report # 214-009	F. Test Date: 01/29/2014

A. Emission Unit Description: Generator G-1A			B. Pollutant: CO
C. Measured Emission Rate: 26.6 ppmv @ 15% O2	D. Limited Emission Rate: 71 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012 Report # 214-009	F. Test Date: 01/29/2014

A. Emission Unit Description: Generator G-1A			B. Pollutant: ROC
C. Measured Emission Rate: 5.1 ppmv @ 15% O2	D. Limited Emission Rate: 14 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012 Report # Report # 214-009	F. Test Date: 01/29/2014

A. Emission Unit Description: Generator G-1B			B. Pollutant: NOX
C. Measured Emission Rate: 0.8 ppmv @ 15% O2	D. Limited Emission Rate: 5 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012 Report # 214-009	F. Test Date: 01/29/2014

A. Emission Unit Description: Generator G-1B			B. Pollutant: CO
C. Measured Emission Rate: 10.9 ppmv @ 15% O2	D. Limited Emission Rate: 71 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012 Report # 214-009	F. Test Date: 01/29/2014

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Apr-14

Equipment	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	89.0	144.0	90.0	88.8	126.0	43.0	134.0	179.0	129.0	225.1	135.0	167.0	Gal/mo	1,529.7	N/A	Gal/yr
South Crane	20.0	39.0	0.0	0.0	65.0	72.0	50.0	0.0	0.0	84.0	0.0	0.0	Gal/mo	310.0	N/A	Gal/yr
Crane Total	109.0	183.0	90.0	88.8	191.0	115.0	184.0	179.0	129.0	289.1	135.0	167.0	Gal/mo	1,840	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	190.0	173.0	188.0	216.0	249.0	202.0	161.0	172.0	180.0	185.0	170.0	120.0	MSCF/mo	2.21	N/A	MMSCF/yr
Unplanned (HP+LP)	138.0	187.0	72.0	145.0	58.0	69.0	4.0	0.0	0.0	0.0	26.0	23.0	MSCF/mo	0.72	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	328.0	360.0	260.0	361.0	307.0	271.0	165.0	172.0	180.0	185.0	196.0	143.0	MSCF/mo	2.93	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	15.0	17.0	9.0	130.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.0	Gal/mo	824.00	55,900	Gal/yr
G3	0.000	0.408	0.000	0.000	0.012	0.000	0.002	0.002	0.024	0.042	0.000	0.000	MMSCF/mo	0.49	51.10	MMSCF/yr
48 BHP Starter Engine	2.5	1.7	4.5	0.0	3.4	5.0	0.0	4.0	20.4	0.0	7.0	0.0	Gal/mo	48.50	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	5.0	0.0	Gal/mo	19.00	Exempt	Gal/yr
Portable Equipment	90.0	73.0	95.0	39.0	60.0	15.0	116.0	35.0	66.0	157.0	139.0	84.7	Gal/mo	969.70	Exempt	Gal/yr
Production Engines																
G-1A	601.7	1,600.1	863.0	198.5	1,363.1	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,968.7	1,515.6	MSCF/mo	16,573.44	N/A	MMSCF/yr
G-1B	2,752.7	1,522.8	2,537.3	2,543.1	1,671.2	1,097.6	1,957.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	MSCF/mo	22,877.17	N/A	MMSCF/yr
Production ICE Total	3,254.4	3,122.9	3,401.3	2,741.6	3,034.3	3,363.8	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	MSCF/mo	39.45	126.72	MMSCF/yr
Drilling Engines																
G-4A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-4B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-4C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
Tanks Throughputs																
T-3A	1,581.0	1,434.5	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	Bbls/mo	18,036	20	MBbl/yr
T-3B	1,581.0	1,434.5	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	Bbls/mo	18,036	20	MBbl/yr
V-8	3,162.0	2,869.0	2,996.0	3,154.0	3,243.0	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,005.0	3,155.0	Bbls/mo	36,925	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lbs/MGal
Enviro-Del	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/MGal
Total Solvents	0.0	0.0	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	65.0	19.5	20.5	22.0	11.3	0.0	7.0	3.0	8.8	17.8	12.3	28.8	Gal/mo	215.75	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	2,560.0	1,737.0	1,491.6	1,500.2	1,770.0	1,601.6	2,005.4	2,054.4	1,309.0	4,450.6	5,036.2	3,426.4	Gal/mo	29,042	N/A	Gal/yr
Work Boat Fuel:	1,869.0	1,477.0	1,305.2	1,312.7	1,546.8	1,401.4	1,754.7	1,539.3	657.8	1,073.3	728.2	0.0	Gal/mo	14,687	N/A	Gal/yr
Total Boat Fuel:	4,429.0	3,214.0	2,796.8	2,812.9	3,316.8	3,003.0	3,760.1	3,593.7	1,966.8	5,523.9	5,764.4	3,426.4	Gal/mo	43,730	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.07	0.05	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	Tons/mo	0.72	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.25	0.90	0.78	0.79	0.93	0.84	1.05	1.01	0.55	1.58	1.62	0.95	Tons/mo	12.27	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.07	0.05	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	Tons/mo	0.73	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	Tons/mo	0.16	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.23	0.16	0.14	0.14	0.17	0.15	0.19	0.18	0.10	0.29	0.29	0.17	Tons/mo	2.23	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
May-14

Equipment	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	144.0	90.0	66.6	126.0	43.0	134.0	179.0	129.0	225.1	135.0	167.0	121.5	Gal/mo	1,562.2	N/A	Gallyr
South Crane	39.0	0.0	0.0	65.0	72.0	50.0	0.0	0.0	64.0	0.0	0.0	0.0	Gal/mo	290.0	N/A	Gallyr
Crane Total	183.0	90.0	66.6	191.0	115.0	184.0	179.0	129.0	289.1	135.0	167.0	121.5	Gal/mo	1,852	13,344	Gallyr*
Flare Gas Consumption:																
Planned (HP+LP)	173.0	188.0	216.0	249.0	202.0	161.0	172.0	180.0	185.0	170.0	120.0	142.0	MSCF/mo	2.16	N/A	MMSCF/yr
Unplanned (HP+LP)	187.0	72.0	145.0	58.0	69.0	4.0	0.0	0.0	0.0	26.0	23.0	123.0	MSCF/mo	0.71	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	360.0	260.0	361.0	307.0	271.0	165.0	172.0	180.0	185.0	196.0	143.0	265.0	MSCF/mo	2.87	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	11.0	9.0	130.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.0	0.0	Gal/mo	809.00	55,900	Gallyr
G3 (Emergency)	0.408	0.000	0.000	0.012	0.000	0.002	0.024	0.024	0.042	0.000	0.000	0.000	MMSCF/mo	0.49	51.10	MMSCF/yr
48 BHP Starter Engine	1.7	4.5	0.0	3.4	5.0	0.0	4.0	20.4	0.0	7.0	0.0	0.0	Gal/mo	46.00	7,315	Gallyr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	5.0	0.0	0.0	Gal/mo	19.00	Exempt	Gallyr
Portable Equipment	73.0	95.0	39.0	60.0	15.0	116.0	35.0	66.0	157.0	139.0	84.7	82.0	Gal/mo	961.70	Exempt	Gallyr
Production Engines																
G-1A	1,600.1	864.0	188.5	1,363.1	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	MSCF/mo	18,395.24	N/A	MMSCF/yr
G-1B	1,522.8	2,537.3	2,543.1	1,671.2	1,097.6	1,957.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	MSCF/mo	22,450.97	N/A	MMSCF/yr
Production ICE Total	3,122.9	3,401.3	2,741.6	3,034.3	3,363.8	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	MSCF/mo	40.85	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gallyr
Tanks Throughputs																
T-3A	1,434.5	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	Bbl/mo	18,004	20	MBbl/yr
T-3B	1,434.5	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	Bbl/mo	18,004	20	MBbl/yr
V-8	2,869.0	2,996.0	3,154.0	3,243.0	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,106.0	3,005.0	3,145.0	Bbl/mo	36,869	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lbs/gal
Enviro-Del	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/gal
Total Solvents	0.0	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	19.5	20.5	22.0	11.3	0.0	7.0	3.0	8.8	17.8	12.3	28.8	27.0	Gal/mo	177.75	Exempt	Gallyr
Boats:																
Crew Boat Fuel:	1,737.0	1,491.6	1,500.2	1,770.0	1,601.6	2,005.4	2,054.4	1,309.0	4,550.6	5,036.2	3,426.4	3,600.8	Gal/mo	30,063	N/A	Gallyr
Work Boat Fuel:	1,477.0	1,305.2	1,312.7	1,548.6	1,401.4	1,754.7	1,539.3	657.8	1,073.3	728.2	0.0	5,048.1	Gal/mo	17,846	N/A	Gallyr
Total Boat Fuel:	3,214.0	2,796.8	2,812.9	3,318.6	3,003.0	3,760.1	3,593.7	1,966.8	5,623.9	5,764.4	3,426.4	8,648.9	Gal/mo	47,930	96,792	Gallyr
Boat Emissions: tons																
ROC	0.05	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	Tons/mo	0.79	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.90	0.78	0.79	0.93	0.84	1.05	1.01	0.55	1.58	1.62	0.96	2.43	Tons/mo	13.44	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.05	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	Tons/mo	0.80	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.03	Tons/mo	0.18	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.16	0.14	0.14	0.17	0.15	0.19	0.16	0.10	0.29	0.29	0.17	0.44	Tons/mo	2.44	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gallyr; with any producing wells, limit is 7,344 gallyr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Jun-14

Equipment	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	90.0	68.6	126.0	43.0	134.0	179.0	129.0	225.1	135.0	167.0	121.5	210.0	Gal/mo	1,628.2	N/A	Gallyr
South Crane	0.0	0.0	65.0	72.0	50.0	0.0	64.0	64.0	0.0	0.0	0.0	67.0	Gal/mo	318.0	N/A	Gallyr
Crane Total	90.0	68.6	191.0	115.0	184.0	179.0	129.0	289.1	135.0	187.0	121.5	277.0	Gal/mo	1,946	13,344	Gallyr*
Flare Gas Consumption:																
Planned (HP+LP)	188.0	216.0	249.0	202.0	161.0	172.0	180.0	185.0	170.0	120.0	142.0	115.0	MSCF/mo	2.10	N/A	MMSCF/yr
Unplanned (HP+LP)	72.0	145.0	56.0	69.0	4.0	0.0	0.0	0.0	26.0	23.0	123.0	20.0	MSCF/mo	0.54	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-81 - Meter GR-83)																
Flare Gas Total	260.0	361.0	307.0	271.0	165.0	172.0	180.0	185.0	196.0	143.0	265.0	135.0	MSCF/mo	2.64	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	9.0	130.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.0	0.0	0.0	Gal/mo	798.00	55,900	Gallyr
G3	0.000	0.000	0.012	0.000	0.002	0.002	0.024	0.042	0.000	0.000	0.000	0.000	MMSCF/mo	0.08	51.10	MMSCF/yr
48 BHP Starter Engine	4.5	0.0	3.4	5.0	0.0	0.0	20.4	0.0	7.0	0.0	0.0	10.0	Gal/mo	54.30	7,315	Gallyr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	14.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	19.00	Exempt	Gallyr
Portable Equipment	95.0	39.0	60.0	15.0	116.0	35.0	66.0	157.0	139.0	84.7	82.0	88.5	Gal/mo	977.20	Exempt	Gallyr
Production Engines																
G-1A	664.0	196.5	1,363.1	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	2,292.6	MSCF/mo	19,060.76	N/A	MMSCF/yr
G-1B	2,637.3	2,543.1	1,671.2	1,087.6	1,967.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	MSCF/mo	23,220.79	N/A	MMSCF/yr
Production ICE Total	3,401.3	2,741.6	3,034.3	3,363.8	3,494.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	MSCF/mo	42.31	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gallyr
Tanks Throughputs																
T-3A	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	Bbls/mo	18,107	20	MBbl/yr
T-3B	1,498.0	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	Bbls/mo	18,107	20	MBbl/yr
V-8	2,996.0	3,154.0	3,243.0	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,106.0	2,200.0	3,005.0	3,155.0	Bbls/mo	36,200	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lbs/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/gal
Total Solvents	0.5	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coolings	20.5	22.0	11.3	0.0	7.0	3.0	6.8	17.8	12.3	28.8	27.0	23.0	Gal/mo	181.25	Exempt	Gallyr
Boats:																
Crew Boat Fuel:	1,491.6	1,500.2	1,770.0	1,601.6	2,005.4	2,054.4	1,309.0	4,550.6	5,036.2	3,426.4	3,600.5	4,480.4	Gal/mo	32,837	N/A	Gallyr
Work Boat Fuel:	1,305.2	1,312.7	1,548.8	1,401.4	1,754.7	1,539.3	657.6	1,073.3	728.2	0.0	5,048.1	4,077.5	Gal/mo	20,447	N/A	Gallyr
Total Boat Fuel:	2,796.8	2,812.9	3,318.8	3,003.0	3,760.1	3,593.7	1,966.6	5,623.9	5,764.4	3,426.4	8,648.9	8,557.9	Gal/mo	53,273	96,792	Gallyr
Boat Emissions: tons																
ROC	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	Tons/mo	0.88	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.78	0.79	0.93	0.84	1.05	1.01	0.55	1.58	1.62	0.96	2.43	2.40	Tons/mo	14.94	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.05	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	Tons/mo	0.89	1.92	Tons/yr at 33.50 lbs/MGal
Sox	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.03	0.03	Tons/mo	0.20	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.14	0.14	0.17	0.15	0.19	0.18	0.10	0.29	0.29	0.17	0.44	0.44	Tons/mo	2.72	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gallyr, with any producing wells, limit is 7,344 gallyr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Jul-14

Equipment	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	68.6	126.0	43.0	134.0	179.0	129.0	225.1	135.0	167.0	121.5	210.0	140.3	Gal/mo	1,678.5	N/A	Gal/yr
South Crane	0.0	65.0	72.0	50.0	0.0	0.0	64.0	0.0	0.0	0.0	87.0	53.3	Gal/mo	371.3	N/A	Gal/yr
Crane Total	68.6	191.0	115.0	184.0	179.0	129.0	289.1	135.0	167.0	121.5	277.0	193.6	Gal/mo	2,050	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	216.0	249.0	202.0	161.0	172.0	180.0	185.0	170.0	120.0	142.0	115.0	72.0	MSCF/mo	1.98	N/A	MMSCF/yr
Unplanned (HP+LP)	145.0	58.0	69.0	4.0	0.0	0.0	0.0	26.0	23.0	125.0	20.0	41.0	MSCF/mo	0.51	N/A	MMSCF/yr
Pilot Purge (HP+LP)	361.0	307.0	271.0	165.0	172.0	160.0	185.0	196.0	143.0	265.0	135.0	113.0	MSCF/mo	2.49	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	130.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.0	0.0	0.0	0.0	Gal/mo	789.00	55,900	Gal/yr
G3	0.000	0.012	0.000	0.002	0.002	0.024	0.042	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.08	51.10	MMSCF/yr
48 BHP Slanter Engine	0.0	3.4	5.0	0.0	4.0	20.4	0.0	7.0	0.0	0.0	10.0	0.0	Gal/mo	49.80	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	14.0	0.0	0.0	5.0	0.0	0.0	0.0	7.0	Gal/mo	26.00	Exempt	Gal/yr
Portable Equipment	39.0	60.0	15.0	116.0	35.0	66.0	157.0	139.0	84.7	82.0	88.5	11.0	Gal/mo	693.20	Exempt	Gal/yr
Production Engines																
G-1A	198.5	1,363.1	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	2,292.6	1,447.8	MSCF/mo	15,674.56	N/A	MMSCF/yr
G-1B	2,543.1	1,671.2	1,087.6	1,957.9	1,404.6	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	MSCF/mo	23,053.81	N/A	MMSCF/yr
Production ICE Total	2,741.6	3,034.3	3,363.8	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	MSCF/mo	42.73	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
Tanks Throughputs																
T-3A	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	Bbls/mo	18,186	20	Mbbl/yr
T-3B	1,577.0	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	Bbls/mo	18,186	20	Mbbl/yr
V-8	3,154.0	3,243.0	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,106.0	2,200.0	3,099.0	3,005.0	3,155.0	Bbls/mo	36,303	3960	Mbbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
E/Wire-Dr	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	0.0	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	22.0	11.3	0.0	7.0	3.0	8.8	17.8	12.3	28.8	27.0	23.0	3.8	Gal/mo	164.50	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	1,500.2	1,770.0	1,601.6	2,005.4	2,054.4	1,309.0	4,550.6	5,036.2	3,426.4	3,600.8	4,480.4	3,892.0	Gal/mo	35,227	N/A	Gal/yr
Work Boat Fuel:	1,312.7	1,548.8	1,401.4	1,754.7	1,539.3	657.8	1,073.3	728.2	0.0	5,048.1	4,077.5	3,729.3	Gal/mo	22,671	N/A	Gal/yr
Total Boat Fuel:	2,812.9	3,318.8	3,003.0	3,760.1	3,593.7	1,966.8	5,623.9	5,764.4	3,426.4	8,648.9	8,557.9	7,621.3	Gal/mo	58,098	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	Tons/mo	0.96	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.79	0.93	0.84	1.05	1.01	0.55	1.58	1.62	0.96	2.43	2.40	2.14	Tons/mo	16.30	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.05	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	Tons/mo	0.97	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.03	0.03	0.03	Tons/mo	0.22	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.14	0.17	0.15	0.19	0.19	0.10	0.25	0.29	0.17	0.44	0.44	0.39	Tons/mo	2.96	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Aug-14

Equipment	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	126.0	43.0	134.0	179.0	129.0	225.1	135.0	167.0	121.5	210.0	140.3	195.0	Gal/mo	1,804.9	N/A	Gal/yr
South Crane	65.0	72.0	50.0	0.0	0.0	64.0	0.0	0.0	0.0	67.0	53.3	0.0	Gal/mo	371.3	N/A	Gal/yr
Crane Total	191.0	115.0	184.0	179.0	129.0	289.1	135.0	167.0	121.5	277.0	193.6	195.0	Gal/mo	2,176	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	249.0	202.0	161.0	172.0	180.0	185.0	170.0	129.0	142.0	115.0	72.0	85.0	MSCF/mo	1,855	N/A	MMSCF/yr
Unplanned (HP+LP)	58.0	69.0	4.0	0.0	0.0	0.0	26.0	23.0	123.0	20.0	41.0	168.0	MSCF/mo	0.53	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-81 - Meter GR-83)																
Flare Gas Total	307.0	271.0	165.0	172.0	180.0	185.0	196.0	143.0	265.0	135.0	113.0	253.0	MSCF/mo	2.39	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.012	0.000	0.002	0.002	0.024	0.042	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.06	51.10	MMSCF/yr
48 BHP Starn Engine	3.4	5.0	4.0	4.0	20.4	0.0	7.0	0.0	0.0	10.0	0.0	4.0	Gal/mo	53.80	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	14.0	0.0	0.0	5.0	0.0	0.0	0.0	7.0	0.0	Gal/mo	26.00	Exempt	Gal/yr
Portable Equipment	60.0	15.0	116.0	35.0	66.0	157.0	139.0	84.7	82.0	88.5	11.0	0.0	Gal/mo	854.20	Exempt	Gal/yr
Production Engines																
G-1A	1,363.1	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,988.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	MSCF/mo	19,476.06	N/A	MMSCF/yr
G-1B	1,671.2	1,087.6	1,957.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	MSCF/mo	24,110.21	N/A	MMSCF/yr
Production ICE Total	3,034.3	3,363.8	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	MSCF/mo	43.59	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gal/yr
Tanks Throughputs																
T-3A	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	Bbls/mo	18,166	20	MBlbl/yr
T-3B	1,621.5	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	Bbls/mo	18,166	20	MBlbl/yr
V-8	3,243.0	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,106.0	2,200.0	3,099.0	3,074.0	3,005.0	3,155.0	Bbls/mo	36,223	3960	MBlbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	0.0	0.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	0.0	0.0	0.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	11.3	0.0	7.0	3.0	6.6	17.8	12.3	28.8	27.0	23.0	3.8	11.0	Gal/mo	153.50	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	1,770.0	1,601.6	2,005.4	2,054.4	1,309.0	4,550.6	5,036.2	3,428.4	3,600.8	4,450.4	3,692.0	4,500.0	Gal/mo	38,227	N/A	Gal/yr
Work Boat Fuel:	1,548.8	1,401.4	1,754.7	1,539.3	657.8	1,073.3	728.2	0.0	5,048.1	4,077.5	3,729.3	4,835.3	Gal/mo	26,364	N/A	Gal/yr
Total Boat Fuel:	3,318.8	3,003.0	3,760.1	3,593.7	1,966.8	5,623.9	5,764.4	3,428.4	8,648.9	8,527.9	7,421.3	9,335.3	Gal/mo	64,620	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.15	Tons/mo	1.07	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.93	0.84	1.05	1.01	0.55	1.58	1.62	0.96	2.43	2.40	2.14	2.62	Tons/mo	18.13	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.16	Tons/mo	1.08	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.03	0.03	0.03	0.04	Tons/mo	0.24	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.17	0.15	0.19	0.18	0.10	0.29	0.29	0.17	0.44	0.44	0.39	0.48	Tons/mo	3.30	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gallyr; with any producing wells, limit is 7,344 gallyr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Sep-14

Equipment	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	43.0	134.0	179.0	129.0	225.1	135.0	167.0	121.5	210.0	140.3	195.0	165.0	Gal/mo	1,843.9	N/A	Gal/yr
South Crane	72.0	50.0	0.0	0.0	64.0	0.0	0.0	0.0	87.0	53.3	0.0	8.0	Gal/mo	314.3	N/A	Gal/yr
Crane Total	115.0	184.0	179.0	129.0	289.1	135.0	167.0	121.5	277.0	193.6	195.0	173.0	Gal/mo	2,158	13,344	Gal/yr^a
Flare Gas Consumption:																
Planned (HP+LP)	202.0	161.0	172.0	180.0	185.0	170.0	120.0	142.0	115.0	72.0	85.0	169.0	MSCF/mo	1.77	N/A	MMSCF/yr
Unplanned (HP+LP)	69.0	4.0	0.0	0.0	0.0	26.0	23.0	123.0	29.0	41.0	168.0	45.0	MSCF/mo	0.52	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	271.0	165.0	172.0	180.0	185.0	196.0	143.0	265.0	135.0	113.0	253.0	214.0	MSCF/mo	2.29	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	0.0	0.0	0.0	0.0	859.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.000	0.002	0.002	0.024	0.042	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.07	51.10	MMSCF/yr
48 BHP Starter Engine	5.0	0.0	4.0	26.4	0.0	7.0	0.0	0.0	10.0	0.0	4.0	2.0	Gal/mo	52.40	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	14.0	0.0	0.0	5.0	0.0	0.0	0.0	7.0	0.0	0.0	Gal/mo	26.00	Exempt	Gal/yr
Portable Equipment	15.0	116.0	35.0	66.0	157.0	139.0	84.7	82.0	88.5	11.0	0.0	35.0	Gal/mo	829.20	Exempt	Gal/yr
Production Engines																
G-1A	2,276.2	1,526.6	2,107.6	1,119.5	1,501.9	1,996.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	MSCF/mo	18,112.96	N/A	MMSCF/yr
G-1B	1,087.6	1,957.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	MSCF/mo	25,075.41	N/A	MMSCF/yr
Production ICE Total	3,363.8	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	MSCF/mo	43.79	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gal/yr
Tanks Throughputs																
T-3A	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	Bbls/mo	18,050	20	MBbl/yr
T-3B	1,631.0	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	Bbls/mo	18,050	20	MBbl/yr
V-3	3,262.0	3,005.0	3,155.0	3,129.0	2,790.0	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,005.0	3,155.0	Bbls/mo	36,134	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lbs/MGal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/MGal
Total Solvents	0.0	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	0.0	7.0	3.0	8.6	17.8	12.3	28.8	27.0	23.0	3.8	11.0	10.3	Gal/mo	152.50	Exempt	Gal/yr
Boats:																
Work Boat Fuel:	1,601.6	2,005.4	2,054.4	1,309.0	4,550.6	5,036.2	3,426.4	3,600.6	4,480.4	3,892.0	4,500.0	3,600.0	Gal/mo	40,057	N/A	Gal/yr
Crane Boat Fuel:	1,401.4	1,754.7	1,539.3	857.8	1,073.3	728.2	0.0	5,048.1	4,077.5	3,229.3	4,835.3	4,579.1	Gal/mo	29,424	N/A	Gal/yr
Total Boat Fuel:	3,003.0	3,760.1	3,593.7	1,966.8	5,623.9	5,764.4	3,426.4	8,648.9	8,557.9	7,621.3	9,335.3	8,179.1	Gal/mo	69,481	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.15	0.14	Tons/mo	1.15	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.84	1.05	1.01	0.55	1.58	1.62	0.96	2.43	2.40	2.14	2.62	2.29	Tons/mo	19.49	32.11	Tons/yr at 661.00 lbs/MGal
PM	0.05	0.06	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.16	0.14	Tons/mo	1.16	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.03	0.03	0.03	0.04	0.03	Tons/mo	0.26	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.15	0.19	0.18	0.10	0.29	0.29	0.17	0.44	0.44	0.39	0.48	0.42	Tons/mo	3.54	5.84	Tons/yr at 102.00 lbs/MGal

^a Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Oct-14

Equipment	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	134.0	179.0	129.0	225.1	135.0	167.0	121.5	210.0	140.3	195.0	165.0	46.0	Gal/mo	1,846.9	N/A	Gal/yr
South Crane	50.0	0.0	0.0	64.0	0.0	0.0	0.0	67.0	53.3	0.0	8.0	52.4	Gal/mo	294.7	N/A	Gal/yr
Crane Total	184.0	179.0	129.0	289.1	135.0	167.0	121.5	277.0	193.6	195.0	173.0	98.4	Gal/mo	2,142	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	161.0	172.0	180.0	185.0	170.0	120.0	142.0	115.0	72.0	85.0	169.0	203.0	MSCF/mo	1.77	N/A	MMSCF/yr
Unplanned (HP+LP)	4.0	0.0	0.0	0.0	26.0	23.0	123.0	20.0	41.0	168.0	45.0	0.0	MSCF/mo	0.45	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	165.0	172.0	180.0	185.0	196.0	143.0	265.0	135.0	113.0	253.0	214.0	203.0	MSCF/mo	2.22	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	0.0	0.0	0.0	659.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.002	0.002	0.024	0.042	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.07	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	4.0	29.4	0.0	7.0	0.0	0.0	10.0	0.0	4.0	2.0	8.5	Gal/mo	55.90	7,315	Gal/yr
P-19 Firewater Pump	0.0	14.0	0.0	0.0	5.0	0.0	0.0	0.0	7.0	0.0	0.0	8.0	Gal/mo	34.00	Exempt	Gal/yr
Portable Equipment	116.0	35.0	66.0	157.0	139.0	94.7	82.0	88.5	11.0	0.0	35.0	28.0	Gal/mo	642.20	Exempt	Gal/yr
Production Engines																
C-1A	1,526.6	2,107.6	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	MSCF/mo	17,269.46	N/A	MMSCF/yr
C-1B	1,957.9	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,598.5	3,236.4	1,908.6	MSCF/mo	26,496.41	N/A	MMSCF/yr
Production ICE Total	3,484.5	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,485.2	3,818.1	3,598.5	3,236.4	3,341.3	MSCF/mo	43.77	126.72	MMSCF/yr
Drilling Engines																
G-GA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-GB	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-GC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gal/yr
Tanks Throughputs																
T-3A	1,602.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	Bbls/mo	17,977	20	Mbbl/yr
T-3B	1,502.5	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	Bbls/mo	17,977	20	Mbbl/yr
V-8	3,005.0	3,155.0	3,129.0	2,780.0	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,005.0	3,155.0	Bbls/mo	35,987	3960	Mbbl/yr
Solvent Usage																
Z-Sol	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Def	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	7.0	3.0	8.8	17.8	12.3	28.8	27.0	23.0	3.8	11.0	10.3	48.0	Gal/mo	200.50	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	2,005.4	2,054.4	1,309.0	4,450.6	5,036.2	3,426.4	3,600.6	4,480.4	3,882.0	4,500.0	3,600.0	3,560.4	Gal/mo	42,016	N/A	Gal/yr
Work Boat Fuel:	1,754.7	1,539.3	657.8	1,073.3	728.2	0.0	5,048.1	4,077.5	3,729.3	4,835.3	4,579.1	3,353.0	Gal/mo	31,375	N/A	Gal/yr
Total Boat Fuel:	3,760.1	3,593.7	1,966.8	5,523.9	5,764.4	3,426.4	8,648.9	8,557.9	7,611.3	9,335.3	8,179.1	6,913.4	Gal/mo	73,391	96,792	Gal/yr
Boat Emissions: Ions																
ROC	0.06	0.06	0.03	0.09	0.10	0.05	0.14	0.14	0.13	0.15	0.14	0.11	Tons/mo	1.22	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.05	1.01	0.55	1.58	1.62	0.96	2.43	2.40	2.14	2.62	2.29	1.94	Tons/mo	20.59	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.06	0.03	0.09	0.10	0.14	0.14	0.14	0.13	0.16	0.16	0.12	Tons/mo	1.23	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.02	0.02	0.01	0.03	0.03	0.03	0.04	0.03	0.03	Tons/mo	0.28	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.19	0.18	0.10	0.29	0.29	0.17	0.44	0.44	0.39	0.48	0.42	0.35	Tons/mo	3.74	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Nov-14

Equipment	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	179.0	129.0	225.1	135.0	167.0	121.5	210.0	140.3	195.0	165.0	46.0	100.1	Gal/mo	1,813.0	N/A	Gal/yr
South Crane	0.0	0.0	64.0	0.0	0.0	0.0	67.0	53.3	0.0	8.0	52.4	0.0	Gal/mo	244.7	N/A	Gal/yr
Crane Total	179.0	129.0	289.1	135.0	167.0	121.5	277.0	193.6	195.0	173.0	98.4	100.1	Gal/mo	2,058	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	172.0	160.0	185.0	170.0	120.0	142.0	115.0	72.0	85.0	169.0	203.0	203.0	MSCF/mo	1.82	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	26.0	23.0	123.0	20.0	41.0	168.0	45.0	0.0	0.0	MSCF/mo	0.45	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	172.0	160.0	185.0	196.0	143.0	265.0	135.0	113.0	253.0	214.0	203.0	203.0	MSCF/mo	2.26	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	0.0	0.0	659.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.002	0.024	0.042	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.07	51.10	MMSCF/yr
46 BHP Starter Engine	14.0	0.0	0.0	7.0	0.0	0.0	10.0	0.0	4.0	2.0	8.5	0.0	Gal/mo	55.90	7,315	Gal/yr
P-19 Firewater Pump	35.0	66.0	157.0	139.0	64.7	92.0	88.5	11.0	0.0	35.0	28.0	48.0	Gal/mo	774.20	Exempt	Gal/yr
Portable Equipment																
Production Engines																
G-1A	2,107.6	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	1,414.2	MSCF/mo	17,157.06	N/A	MMSCF/yr
G-1B	1,404.8	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	1,908.6	1,738.6	MSCF/mo	26,277.31	N/A	MMSCF/yr
Production ICE Total	3,512.4	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	3,341.3	3,153.0	MSCF/mo	43.43	126.72	MMSCF/yr
Drilling Engines																
G-5A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-5B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
Tanks Throughputs																
T-3A	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	Bbls/mo	17,967	20	MBbl/yr
T-3B	1,577.5	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	Bbls/mo	17,967	20	MBbl/yr
V-8	3,155.0	3,129.0	2,790.0	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,011.0	3,005.0	3,155.0	Bbls/mo	35,993	3960	MBbl/yr
Solvent Usage																
Z-Sol	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lbs/MGal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lbs/MGal
Total Solvents	1.0	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	3.0	8.8	17.8	12.3	28.8	27.0	23.0	3.8	11.0	10.3	48.0	44.3	Gal/mo	237.75	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	2,054.4	1,309.0	4,650.6	5,036.2	3,426.4	3,600.8	4,480.4	3,892.0	4,500.0	3,600.0	3,560.4	2,313.2	Gal/mo	42,323	N/A	Gal/yr
Work Boat Fuel:	1,539.3	657.8	1,073.3	728.2	0.0	5,048.1	4,077.5	3,729.3	4,835.3	4,579.1	3,353.0	4,211.2	Gal/mo	33,832	N/A	Gal/yr
Total Boat Fuel:	3,593.7	1,966.8	5,723.9	5,764.4	3,426.4	8,648.9	8,557.9	7,621.3	9,335.3	8,179.1	6,913.4	6,524.4	Gal/mo	76,155	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.15	0.14	0.11	0.11	Tons/mo	1.26	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.01	0.55	1.58	1.62	0.96	2.43	2.40	2.14	2.62	2.29	1.94	1.83	Tons/mo	21.36	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.16	0.14	0.12	0.11	Tons/mo	1.28	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.02	0.02	0.01	0.03	0.03	0.03	0.04	0.03	0.03	0.02	Tons/mo	0.29	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.18	0.10	0.29	0.29	0.17	0.44	0.44	0.39	0.48	0.42	0.35	0.33	Tons/mo	3.88	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gallyr. with any producing wells, limit is 7,344 gallyr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Dec-14

Equipment	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	129.0	225.1	135.0	167.0	121.5	210.0	140.3	195.0	165.0	46.0	100.1	195.0	Gal/mo	1,829.0	N/A	Gallyr
South Crane	0.0	64.0	0.0	0.0	0.0	67.0	53.3	0.0	8.0	52.4	0.0	0.0	Gal/mo	244.7	N/A	Gallyr
Crane Total	129.0	289.1	135.0	167.0	121.5	277.0	193.6	195.0	173.0	98.4	100.1	195.0	Gal/mo	2,074	13,344	Gallyr*
Flare Gas Consumption:																
Planned (HP+LP)	180.0	185.0	170.0	120.0	142.0	115.0	72.0	85.0	169.0	203.0	203.0	314.0	MSCF/mo	1.96	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	26.0	23.0	123.0	20.0	41.0	168.0	45.0	0.0	0.0	0.0	MSCF/mo	0.45	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-31 - Meter GR-83)																
Flare Gas Total	180.0	185.0	196.0	143.0	265.0	135.0	113.0	253.0	214.0	203.0	203.0	314.0	MSCF/mo	2.40	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	0.0	659.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gallyr
G3	0.024	0.042	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.07	51.10	MMSCF/yr
48 BHP Starter Engine	20.4	0.0	7.0	0.0	0.0	10.0	0.0	4.0	2.0	8.5	0.0	0.0	Gal/mo	51.90	7,315	Gallyr
P-19 Firewater Pump	0.0	0.0	5.0	0.0	0.0	0.0	7.0	0.0	0.0	8.0	8.0	0.0	Gal/mo	25.00	Exempt	Gallyr
Portable Equipment	66.0	157.0	139.0	84.7	82.0	88.5	11.0	0.0	35.0	26.0	48.0	78.0	Gal/mo	817.20	Exempt	Gallyr
Production Engines																
G-1A	1,119.5	1,501.9	1,998.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	1,414.2	2,165.4	MSCF/mo	17,214.65	N/A	MMSCF/yr
G-1B	2,519.0	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	1,908.6	1,738.8	1,236.3	MSCF/mo	26,108.81	N/A	MMSCF/yr
Production ICE Total	3,638.5	3,139.8	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	3,341.3	3,153.0	3,401.7	MSCF/mo	43.32	126.72	MMSCF/yr
Drilling Engines																
G-6A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gallyr
Tanks Throughputs																
T-3A	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	Bbl/mo	17,967	20	MBbl/yr
T-3B	1,564.5	1,395.0	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	Bbl/mo	17,967	20	MBbl/yr
V-9	3,129.0	2,790.0	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,011.0	3,115.0	3,005.0	3,155.0	Bbl/mo	35,953	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.5	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	8.8	17.8	12.3	29.6	27.0	23.0	3.8	11.0	10.3	48.0	44.3	37.8	Gal/mo	272.50	Exempt	Gallyr
Boats:																
Crew Boat Fuel:	1,309.0	4,550.6	5,035.2	3,426.4	3,600.9	4,480.4	3,892.0	4,500.0	3,600.0	3,560.4	2,313.2	4,354.4	Gal/mo	44,623	N/A	Gallyr
Work Boat Fuel:	657.8	1,073.3	728.2	0.0	5,045.1	4,077.5	3,729.3	4,835.3	4,579.1	3,553.0	4,211.2	0.0	Gal/mo	32,253	N/A	Gallyr
Total Boat Fuel:	1,966.8	5,623.9	5,763.4	3,426.4	8,645.9	8,557.9	7,621.3	9,335.3	8,179.1	6,913.4	6,524.4	4,354.4	Gal/mo	76,916	96,792	Gallyr
Boat Emissions: tons																
ROC	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.15	0.14	0.11	0.11	0.07	Tons/mo	1.27	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.55	1.58	1.62	0.96	2.43	2.40	2.14	2.62	2.29	1.94	1.83	1.22	Tons/mo	21.57	32.11	Tons/yr at 661.00 lbs/MGal
PM	0.03	0.09	0.10	0.06	0.14	0.14	0.13	0.16	0.14	0.12	0.11	0.07	Tons/mo	1.29	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.02	0.02	0.01	0.03	0.03	0.03	0.04	0.03	0.03	0.02	0.02	Tons/mo	0.29	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.10	0.29	0.29	0.17	0.44	0.44	0.39	0.48	0.42	0.35	0.33	0.22	Tons/mo	3.92	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gallyr, with any producing wells, limit is 7,344 gallyr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Jan-15

Equipment	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	225.1	135.0	167.0	121.5	210.0	140.3	195.0	165.0	46.0	100.1	195.0	45.0	Gal/mo	1,745.0	N/A	Gal/yr
South Crane	64.0	0.0	0.0	0.0	67.0	53.3	0.0	8.0	52.4	0.0	0.0	0.0	Gal/mo	244.7	N/A	Gal/yr
Crane Total	289.1	135.0	167.0	121.5	277.0	193.6	195.0	173.0	98.4	100.1	195.0	45.0	Gal/mo	1,990	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	185.0	170.0	120.0	142.0	115.0	72.0	85.0	169.0	203.0	203.0	314.0	346.0	MSCF/mo	2,12	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	26.0	23.0	123.0	20.0	41.0	168.0	45.0	0.0	0.0	0.0	0.0	MSCF/mo	0.45	N/A	MMSCF/yr
Pilot Purge (HP+LP)	185.0	196.0	143.0	265.0	135.0	113.0	253.0	214.0	203.0	203.0	314.0	346.0	MSCF/mo	2.57	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	0.0	659.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.042	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.04	51.10	MMSCF/yr
48 BHP Stainer Engine	0.0	7.0	0.0	0.0	10.0	0.0	4.0	0.0	8.5	0.0	0.0	26.0	Gal/mo	57.50	7,315	Gal/yr
P-19 Firewater Pump	0.0	5.0	0.0	0.0	0.0	0.0	7.0	0.0	8.0	8.0	0.0	0.0	Gal/mo	35.00	Exempt	Gal/yr
Portable Equipment	157.0	139.0	84.7	82.0	88.5	11.0	0.0	35.0	26.0	48.0	78.0	67.0	Gal/mo	618.20	Exempt	Gal/yr
Production Engines																
G-1A	1,501.9	1,596.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	1,414.2	2,165.4	947.9	MSCF/mo	17,043.29	N/A	MMSCF/yr
G-1B	1,638.0	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	1,905.6	1,738.8	1,236.3	2,248.5	MSCF/mo	25,838.29	N/A	MMSCF/yr
Production ICE Total	3,139.8	3,312.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	3,341.3	3,153.0	3,401.7	3,196.4	MSCF/mo	42.88	126.72	MMSCF/yr
Drilling Engines																
G-5A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-5B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-5C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gal/yr
Tanks Throughputs																
T-3A	1,395.0	1,503.0	1,100.0	1,549.5	1,537.0	1,577.0	1,567.5	1,506.5	1,557.5	1,493.0	1,577.0	1,620.5	Bbls/mo	18,023	20	MBbl/yr
T-3B	1,395.0	1,503.0	1,100.0	1,549.5	1,537.0	1,577.0	1,567.5	1,506.5	1,557.5	1,493.0	1,577.0	1,620.5	Bbls/mo	18,023	20	MBbl/yr
V-8	2,790.0	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,011.0	3,115.0	2,988.0	3,005.0	3,155.0	Bbls/mo	35,810	3960	MBbl/yr
Solvent Usage																
Z-Sol	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	Gal/mo	0.03	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Del	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	0.0	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	Gal/mo	0.03	4.45	Tons/yr ROC
Total Coatings	17.8	12.3	26.8	27.0	23.0	3.8	11.0	10.3	48.0	44.3	37.8	32.3	Gal/mo	296.00	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	4,550.6	5,036.2	3,426.4	3,609.8	4,480.4	3,892.0	4,500.0	3,600.0	3,560.4	2,313.2	4,354.4	1,965.0	Gal/mo	45,279	N/A	Gal/yr
Work Boat Fuel:	1,073.3	728.2	0.0	5,046.1	4,077.5	3,729.3	4,835.3	4,579.1	3,353.0	4,211.2	0.0	1,719.4	Gal/mo	33,354	N/A	Gal/yr
Total Boat Fuel:	5,623.9	5,764.4	3,426.4	8,655.9	8,557.9	7,621.3	9,335.3	8,179.1	6,913.4	6,524.4	4,354.4	3,684.4	Gal/mo	78,634	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.09	0.10	0.06	0.14	0.14	0.13	0.15	0.14	0.11	0.11	0.07	0.06	Tons/mo	1.30	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.58	1.62	0.96	2.43	2.40	2.14	2.62	2.29	1.94	1.83	1.22	1.03	Tons/mo	22.06	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.09	0.10	0.06	0.14	0.14	0.13	0.16	0.16	0.12	0.11	0.07	0.06	Tons/mo	1.32	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.02	0.02	0.01	0.03	0.03	0.03	0.04	0.03	0.03	0.02	0.02	0.01	Tons/mo	0.29	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.29	0.29	0.17	0.44	0.44	0.39	0.46	0.42	0.35	0.33	0.22	0.19	Tons/mo	4.01	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Feb-15

Equipment	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	135.0	187.0	121.5	210.0	140.3	195.0	165.0	45.0	100.1	195.0	45.0	90.0	Gal/mo	1,609.9	N/A	Gal/yr
South Crane	0.0	0.0	0.0	67.0	53.3	0.0	6.0	52.4	0.0	0.0	0.0	0.0	Gal/mo	180.7	N/A	Gal/yr
Crane Total	135.0	187.0	121.5	277.0	193.6	195.0	173.0	98.4	100.1	195.0	45.0	90.0	Gal/mo	1,791	13,344	Gal/yr^a
Flare Gas Consumption:																
Planned (HP+LP)	170.0	120.0	142.0	115.0	72.0	85.0	169.0	203.0	203.0	314.0	346.0	263.0	MSCF/mo	2.20	N/A	MMSCF/yr
Unplanned (HP+LP)	26.0	23.0	123.0	20.0	41.0	168.0	45.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.45	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Flare Gas Total	196.0	143.0	265.0	135.0	113.0	253.0	214.0	203.0	203.0	314.0	346.0	263.0	MSCF/mo	2.65	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	0.0	659.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.00	51.10	MMSCF/yr
48 BHP Starter Engine	7.0	0.0	0.0	10.0	0.0	4.0	2.0	8.5	0.0	0.0	26.0	5.0	Gal/mo	62.50	7,315	Gal/yr
P-19 Firewater Pump	5.0	0.0	0.0	0.0	0.0	0.0	0.0	8.0	8.0	0.0	7.0	0.0	Gal/mo	35.00	Exempt	Gal/yr
Portable Equipment	139.0	84.7	82.0	88.5	11.0	0.0	35.0	28.0	48.0	78.0	67.0	134.0	Gal/mo	795.20	Exempt	Gal/yr
Production Engines																
G-1A	1,956.7	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	1,414.2	2,165.4	947.9	1,286.3	MSCF/mo	16,827.74	N/A	MMSCF/yr
G-1B	1,715.4	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	1,908.6	1,738.8	1,236.3	2,248.5	1,866.5	MSCF/mo	26,066.84	N/A	MMSCF/yr
Production ICE Total	3,714.1	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	3,341.3	3,153.0	3,401.7	3,196.4	3,152.8	MSCF/mo	42.89	126.72	MMSCF/yr
Drilling Engines																
G-8A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-8B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-6C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
Tanks Throughputs																
T-3A	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	1,620.5	1,383.5	Bbls/mo	18,021	20	MBbl/yr
T-3B	1,553.0	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	1,620.5	1,383.5	Bbls/mo	18,021	20	MBbl/yr
V-9	3,106.0	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,011.0	3,115.0	2,986.0	3,154.0	3,005.0	3,155.0	Bbls/mo	36,174	3960	MBbl/yr
Solvent Usage																
Z-Sol	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	0.0	Gal/mo	0.03	N/A	Tons/yr ROC at 1.64 lb/gal
Enviro-Del	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	1.0	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	0.0	Gal/mo	0.03	4.45	Tons/yr ROC
Total Coatings	12.3	28.8	27.0	23.0	3.8	11.0	10.3	48.0	44.3	37.8	32.3	29.0	Gal/mo	307.25	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	5,036.2	3,426.4	3,600.8	4,480.4	3,892.0	4,500.0	3,600.0	3,560.4	2,313.2	4,354.4	1,965.0	2,263.2	Gal/mo	42,982	N/A	Gal/yr
Work Boat Fuel:	728.2	0.0	5,048.1	4,077.5	3,729.3	4,835.3	4,579.1	3,353.0	4,211.2	0.0	1,719.4	1,971.6	Gal/mo	34,252	N/A	Gal/yr
Total Boat Fuel:	5,764.4	3,426.4	8,648.9	8,557.9	7,621.3	9,335.3	8,179.1	6,913.4	6,524.4	4,354.4	3,684.4	4,224.8	Gal/mo	77,234	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.10	0.06	0.14	0.14	0.13	0.15	0.14	0.11	0.11	0.07	0.06	0.07	Tons/mo	1.28	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.62	0.96	2.43	2.40	2.14	2.62	2.29	1.94	1.83	1.22	1.03	1.19	Tons/mo	21.66	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.10	0.06	0.14	0.14	0.13	0.16	0.14	0.12	0.11	0.07	0.06	0.07	Tons/mo	1.29	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.02	0.01	0.03	0.03	0.03	0.04	0.03	0.03	0.02	0.02	0.01	0.02	Tons/mo	0.29	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.29	0.17	0.44	0.44	0.39	0.48	0.42	0.35	0.33	0.22	0.19	0.22	Tons/mo	3.94	5.84	Tons/yr at 102.00 lbs/MGal

^a Without producing wells, crane limit is 13,344 gal/yr, with any producing wells, limit is 7,344 gal/yr.

Platform Grace
PTO No. 1493 Equipment Usage
Rolling 12-Months Ending:
Mar-15

Equipment	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
Cranes:																
North Crane	167.0	121.5	219.0	140.3	195.0	165.0	46.0	100.1	195.0	45.0	90.0	89.0	Gal/mo	1,563.9	N/A	Gal/yr
South Crane	0.0	0.0	67.0	53.3	0.0	8.0	52.4	0.0	0.0	0.0	0.0	0.0	Gal/mo	160.7	N/A	Gal/yr
Crane Total	167.0	121.5	277.0	193.6	195.0	173.0	98.4	100.1	195.0	45.0	90.0	89.0	Gal/mo	1,745	13,344	Gal/yr*
Flare Gas Consumption:																
Planned (HP+LP)	120.0	142.0	115.0	72.0	85.0	169.0	203.0	203.0	314.0	345.0	263.0	263.0	MSCF/mo	2.30	N/A	MMSCF/yr
Unplanned (HP+LP)	23.0	123.0	20.0	41.0	166.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.42	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-81 - Meter GR-83)																
Flare Gas Total	143.0	265.0	135.0	113.0	263.0	214.0	203.0	203.0	314.0	346.0	263.0	263.0	MSCF/mo	2.72	12.50	MMSCF/yr
Generators:																
G2 (Emergency)	659.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	659.00	55,900	Gal/yr
G3	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	MMSCF/mo	0.00	51.10	MMSCF/yr
48 BHP Starter Engine	0.0	0.0	10.0	0.0	4.0	2.0	8.5	0.0	0.0	26.0	5.0	0.0	Gal/mo	55.50	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	7.0	0.0	0.0	8.0	8.0	0.0	7.0	0.0	0.0	Gal/mo	50.00	Exempt	Gal/yr
Portable Equipment	64.7	82.0	68.5	11.0	0.0	35.0	28.0	48.0	78.0	87.0	134.0	41.0	Gal/mo	697.20	Exempt	Gal/yr
Production Engines																
G-1A	1,515.6	2,326.5	2,292.6	1,447.8	0.0	0.0	1,432.7	1,414.2	2,165.4	947.9	1,286.3	1,841.4	MSCF/mo	16,670.44	N/A	MMSCF/yr
G-1B	1,527.4	2,326.5	2,292.6	2,370.3	3,599.5	3,236.4	1,908.6	1,736.8	1,236.3	2,248.5	1,866.5	1,568.8	MSCF/mo	25,920.24	N/A	MMSCF/yr
Production ICE Total	3,043.0	4,653.0	4,585.2	3,818.1	3,599.5	3,236.4	3,341.3	3,153.0	3,401.7	3,196.4	3,152.8	3,410.2	MSCF/mo	42.59	126.72	MMSCF/yr
Drilling Engines																
G-8A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-8B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
G-8C	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	N/A	MMSCF/yr
Drilling ICE Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MMSCF/mo	0.00	60.00	MMSCF/yr
Diesel Backup Generator																
													Gal/mo	0.00	4,300	Gal/yr
Tanks Throughputs																
T-3A	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	1,620.5	1,393.5	1,525.0	Bbl/mo	17,993	20	MBl/yr
T-3B	1,100.0	1,549.5	1,537.0	1,577.0	1,557.5	1,505.5	1,557.5	1,493.0	1,577.0	1,620.5	1,393.5	1,525.0	Bbl/mo	17,993	20	MBl/yr
V-8	2,200.0	3,099.0	3,074.0	3,154.0	3,115.0	3,011.0	3,115.0	2,986.0	3,154.0	3,241.0	3,005.0	3,155.0	Bbl/mo	36,309	3960	MBl/yr
Solvent Usage																
Z-Sol	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	0.0	0.0	Gal/mo	0.02	N/A	Tons/yr ROC at 1.64 lb/gal
Emmo-Det	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
Total Solvents	20.0	1.0	0.0	0.0	0.0	0.5	2.0	0.0	0.0	6.0	0.0	0.0	Gal/mo	0.02	4.45	Tons/yr ROC
Total Coatings	28.8	27.0	23.0	3.8	11.0	10.3	48.0	44.3	37.8	32.3	29.0	26.3	Gal/mo	321.25	Exempt	Gal/yr
Boats:																
Crew Boat Fuel:	3,426.4	3,600.8	4,480.4	3,892.0	4,500.0	3,600.0	3,560.4	2,313.2	4,354.4	1,965.0	2,253.2	1,790.0	Gal/mo	39,736	N/A	Gal/yr
Work Boat Fuel:	0.0	5,048.1	4,077.5	3,729.3	4,835.3	4,579.1	3,353.0	4,211.2	0.0	1,719.4	1,971.6	1,566.3	Gal/mo	35,090	N/A	Gal/yr
Total Boat Fuel:	3,426.4	8,648.9	8,557.9	7,621.3	9,335.3	8,179.1	6,913.4	6,524.4	4,354.4	3,684.4	4,224.8	3,356.3	Gal/mo	74,826	96,792	Gal/yr
Boat Emissions: tons																
ROC	0.06	0.14	0.14	0.13	0.15	0.14	0.11	0.11	0.07	0.06	0.07	0.06	Tons/mo	1.24	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.96	2.43	2.40	2.14	2.62	2.29	1.94	1.83	1.22	1.03	1.03	0.84	Tons/mo	20.99	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.16	0.14	0.13	0.16	0.14	0.11	0.11	0.07	0.06	0.07	0.06	Tons/mo	1.25	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.03	0.03	0.03	0.04	0.03	0.03	0.02	0.02	0.01	0.02	0.01	Tons/mo	0.28	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.17	0.44	0.44	0.39	0.48	0.42	0.35	0.33	0.22	0.19	0.22	0.17	Tons/mo	3.82	5.84	Tons/yr at 102.00 lbs/MGal

* Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr

ENGINE DATA FOR THE CATERPILLAR ENGINE (G-1A)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Serial No.: 5VA0058

Engine Location: Turbine room, southwest corner of platform, production deck

Summary of Maintenance and Testing Reports are Included for the Following:

- Service records are attached.

Source Test Report: Please refer to the last source test report previously submitted to the District. Enclosed are summary of results.

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: MAY

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1	1	28	1:30					VB
2	2	57	0:00					VB
3	1	61	0:00					VB
4	1	59	3:00					VB
5	3	63	1:10					VB
6	1	30	1:15					WL
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17				OOS				
18	2	0	6:59					VB
19	1	1	1:50					VB
20	3	16	1:36					VB
21	1	56	5:55					WC
22	2	40	2:37					WC
23	1	47	1:43					WC
24	1	47	3:12					WC
25	1	69	0:20					WC
26	1	37	4:55					WC
27	3	3	1:25					WC
28	2	49	1:35					VB
29	4	25	2:53					VB
30	3	2	2:16					VB
31	3	5	2:24					VB

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

MONTH: July

YEAR: 2014

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 6 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Time	Tester's Initials
Day	Nox				CO	CO		
1			OOS					
2	4	9	1:04					WL
3	3	11	0:31					WL
4	2	18	0:28					WL
5	4	7	0:24					WL
6	1	62	0:26					WL
7	2	45	0:38					WL
8	2	11	0:43					WL
9	5	4	1:07					VB
10			OOS					
11			OOS					
12			OOS					
13			OOS					
14			OOS					
15			OOS					
16			OOS					
17			OOS					
18			OOS					
19			OOS					
20			OOS					
21	2	8	15:50					WL
22	2	67	3:40					WC
23	2	39	1:28					DG
24	3	17	2:13					DG
25	3	55	1:15					DG
26	2	36	2:25					DG
27			OOS					
28			OOS					
29			OOS					
30			OOS					
31			OOS					

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: AUGUST

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO		
1				OOS				
2				OOS				
3				OOS				
4				OOS				
5				OOS				
6				OOS				
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17				OOS				
18				OOS				
19				OOS				
20				OOS				
21				OOS				
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26				OOS				
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

Condition PQ11493PC5

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: SEPTEMBER

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS			SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 16% O2)	Secondary Reading (ppmv @ 15% O2) (If needed)		Time	Tester's Initials	
Day	Nox			CO	Nox			CO
1			OOS					
2			OOS					
3			OOS					
4			OOS					
5			OOS					
6			OOS					
7			OOS					
8			OOS					
9			OOS					
10			OOS					
11			OOS					
12			OOS					
13			OOS					
14			OOS					
15			OOS					
16			OOS					
17			OOS					
18			OOS					
19			OOS					
20			OOS					
21			OOS					
22			OOS					
23			OOS					
24			OOS					
25			OOS					
26			OOS					
27			OOS					
28			OOS					
29			OOS					
30			OOS					
31								

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A			Month:OCT	Year: 2014	G1-A			
INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				OOS				
2				OOS				
3				OOS				
4				OOS				
5				OOS				
6				OOS				
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17	4	30	7:37					VB
18	3	10	0:00					VB
19	3	12	2:21					VB
20	3	9	1:23					VB
21	5	11	1:07					VB
22	3	3	0:44					WL
23	4	4	0:46					WL
24	3	4	0:40					WL
25	3	3	0:36					WL
26	5	3	0:36					WL
27	5	7	0:46					WL
28	2	3	0:49					WL
29	4	53	1:44					DG
30	3	55	2:31					DG
31	2	5	1:25					DG

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A Month: December Year: 2014

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST				
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Time	Tester's Initials
	Nox	CO				CO			
1				OOS					
2				OOS					
3				OOS					
4				OOS					
5				OOS					
6	5	10	1:09						JTR
7	2	15	1:02						JTR
8	3	13	1:01						JTR
9	5	0	1:13						JTR
10	4	21	1:58						JTR
11	3	18	1:47						JTR
12	5	9	5:23						WC
13	3	0	6:10						WC
14	3	7	2:56						WC
15	3	17	5:37						WC
16	2	30	4:27						WC
17	5	41	1:31						WC
18	5	33	5:47						WC
19	4	31	1:06						JTR
20	2	63	1:57						JTR
21	3	16	1:13						JTR
22	5	2	1:25						JTR
23	3	30	1:09						JTR
24	3	1	1:50						JTR
25	4	9	1:14						JTR
26	4	0	0:29						WL
27	4	1	0:35						WL
28	2	1	0:27						WL
29	4	2	0:37						WL
30	5	0	0:24						WL
31	0	3	0:27						WL

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A Month: Jan Year: 2015

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1	4	2	3:35					WC
2	4	4	5:52					WC
3	3	10	3:21					WC
4	3	14	4:23					WC
5	3	3	2:48					WC
6	3	3	4:57					WC
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17				OOS				
18				OOS				
19				OOS				
20				OOS				
21				OOS				
22	4	6	10:11					VB
23	4	4	2:20					MK
24	4	5	2:00					MK
25	5	5	3:00					MK
26	3	3	2:30					MK
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: MARCH

Year: 2015

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (If needed)		Tester's Initials
	Nox	CO				CO	Time	
1	4	5	5:38					WC
2	4	5	5:40					WC
3	4	45	2:08					WC
4	5	6	1:00					MK
5	3	4	2:00					MK
6	5	4	4:00					MK
7	5	5	1:45					MK
8	5	5	3:00					MK
9	5	5	2:30					MK
10	4	3	2:00					MK
11	5	8	0:16					WL
12	5	5	0:42					WL
13	4	7	0:49					WL
14	4	5	0:33					WL
15	5	6	0:32					WL
16	4	6	0:48					WL
17	4	5	0:44					WL
18				OOS				
19				OOS				
20				OOS				
21				OOS				
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26				OOS				
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

PLATFORM GRACE GENERATOR SERVICE

DATE: 2/22/2015

UNIT: G-1A

HOURS: 26096

MECHANIC: LARRY, DAVE, MIKE

1500 HOUR SERVICE

3000 HOUR SERVICE

SERVICE / REPAIR

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO

COMMENTS:

CHANGE OIL FILTERS: YES NO

COMMENTS:

CHANGE CRANK CASE OIL: YES NO

COMMENTS:

REPLACE AIR FILTERS: YES NO PRE FILTERS: YES NO GEN INTAKE FILTERS: YES NO

COMMENTS:

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO

SPINNER II PAPER INSERT: YES NO

COMMENTS:

REPLACE O2 SENSORS: YES NO

COMMENTS:

SERVICE / REPAIR

G-1 & G-6 SERIES PART NUMBERS & QTY

SPARK PLUG: (16) CHAMPION 1224 RL85G O2 SENSOR: (3) BOSCH 75-1521 (4-WIRE) OIL FILTERS: (6) BALDWIN PT670

AIR FILTER: (2) DONALDSON P111098 AIR PRE-FILTER: (2) DONALDSON P607314 GEN INTAKE FILTER: (4) 16 X 25 X 2

SPINNER II 3600: (1) 73358 600 HD/360 PAPER INSERT CAT ELEMENT GASKET: (2) 102" LID: (1) 77"

BELTS: (4) GOODYEAR 5VX1000

SIGNATURE

Larry Hayes

PLATFORM GRACE GENERATOR SERVICE

DATE: 10/17/2014
 UNIT: G-1A
 HOURS: 24573
 MECHANIC: LARRY, SETH AND DAVE

1500 HOUR SERVICE
 3000 HOUR SERVICE
 SERVICE / REPAIR

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO

COMMENTS: _____

CHANGE OIL FILTERS: YES NO

COMMENTS: _____

CHANGE CRANK CASE OIL: YES NO

COMMENTS: _____

REPLACE AIR FILTERS: YES NO PRE FILTERS: YES NO GEN INTAKE FILTERS: YES NO

COMMENTS: _____

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO SPINNER II PAPER INSERT: YES NO

COMMENTS: _____

REPLACE O2 SENSORS: YES NO

COMMENTS: _____

SERVICE / REPAIR

G-1 & G-6 SERIES PART NUMBERS & QTY

SPARK PLUG:(16) CHAMPION 1224 RL56 O2 SENSOR: (3) BOSCH 75-1521 (4-WIRE) OIL FILTERS: (6) BALDWIN PT670
 AIR FILTER: (2) DONALDSON P111098 AIR PRE-FILTER: (2) DONALDSON P607314 GEN INTAKE FILTER: (4) 16 X 25 X 2
 SPINNER II 3600: (1) 73358 600 HD/360 PAPER INSERT CAT ELEMENT GASKET: (2) 102" LID: (1) 77"
 BELTS: (4) GOODYEAR 5VX1000

SIGNATURE *Larry Hayes*

Per APCD rules regulation, 74.9, Stationary Internal Combustion Engine

ENGINE DATA FOR THE CATERPILLAR (G-1B)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Serial No.: 5VA00572

Engine Location: Turbine room, southwest corner of platform, production deck

Summary of Maintenance and Testing Reports are Included for the Following:

- Service records are attached.

Source Test Report: Please refer to the last source test previously submitted to the District. Enclosed are summary of results.

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: April

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	Nox				Nox	CO	
1	1	85	4:00				WC
2	3	80	1:30				VB
3	1	59	1:40				VB
4	2	54	1:58				VB
5	1	55	2:44				VB
6	1	47	2:13				VB
7	1	7	2:58				VB
8	2	53	1:21				VB
9	2	28	0:35				WL
10	1	85	0:37				WL
11	2	22	0:27				WL
12	2	45	0:33				WL
13	1	44	0:44				WL
14	3	24	0:43				WL
15				OOS			
16				OOS			
17				OOS			
18				OOS			
19				OOS			
20				OOS			
21				OOS			
22				OOS			
23				OOS			
24				OOS			
25				OOS			
26				OOS			
27				OOS			
28				OOS			
29				OOS			
30				OOS			
31							

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

MONTH: MAY

YEAR: 2014

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1								
2								
3								
4								
5								
6								
7	0	2	11:06					WC
8	1	62	1:05					WL
9	1	61	1:04					WL
10	1	15	0:45					WL
11	2	58	0:26					WL
12	1	26	0:26					WL
13	1	1	0:35					WL
14	2	1	1:00					vb
15	5	1	1:45					vb
16	5	1	1:13					vb
17	2	0	1:58					vb
18	2	0	6:59					vb
19				OOS				
20				OOS				
21				OOS				
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26				OOS				
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B				Month: JULY	Year: 2014	G1-B		
INITIAL NOX/CO TEST				CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15%O2)		Time		Corrective Actions Taken (in the event that initial test result is greater than 5 ppmv @ 15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	Nox	CO	Time	Nox	CO	Time	Initials	
1				OOS				
2				OOS				
3				OOS				
4				OOS				
5				OOS				
6				OOS				
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13	1	1	6:00				VB	
14	3	1	2:30				VB	
15	1	11	1:51				VB	
16	1	42	2:20				WC	
17	3	27	1:21				WC	
18	2	60	2:20				WC	
19	1	56	2:04				WC	
20	1	67	2:57				WC	
21	2	58	1:30				WC	
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26	3	1	16:04				VB	
27	2	5	1:21				DG	
28	1	11	1:16				DG	
29	2	9	3:06				DG	
30	2	4	0:35				WL	
31	2	12	14:35				WC	

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: AUG

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			Tester's Initials
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Time	
Day	Nox				CO	Nox		CO
1	3	3	0:32					WL
2	5	7	0:33					WL
3	2	3	0:40					WL
4	4	6	0:43					WL
5	2	6	1:14					WL
6	5	11	1:28					DG
7	4	3	1:27					DG
8	4	2	1:28					DG
9	5	6	1:41					DG
10	2	2	2:55					DG
11	2	13	1:25					DG
12	4	8	1:19					DG
13	5	3	1:10					WL
14	1	40	1:00					WL
15	3	6	9:36					WC
16	3	3	0:34					WL
17	5	8	0:36					WL
18	1	10	0:31					WL
19	4	4	0:36					WL
20	2	3	2:02					VB
21	2	2	2:27					VB
22	4	5	2:59					VB
23	1	9	2:27					VB
24	4	11	2:10					VB
25	4	8	1:15					VB
26	2	2	1:56					VB
27	2	5	0:42					WL
28	3	8	0:43					WL
29	4	0	0:41					WL
30	4	9	0:48					WL
31	4	6	0:44					WL

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B Month October 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1	4	21	1:39					DG
2	1	42	1:45					DG
3	2	50	2:17					DG
4	1	58	1:58					DG
5	1	23	2:26					DG
6	1	41	2:17					DG
7	1	51	1:29					DG
8	2	26	6:37					WL
9	1	38	3:16					WC
10	2	50	4:18					WC
11	1	13	3:02					WC
12	2	47	0:42					WC
13	1	68	0:30					WC
14	1	39	0:22					WC
15	1	4	1:57					VB
16	1	8	1:40					VB
17	1	4	1:49					VB
18				OOS				
19				OOS				
20				OOS				
21				OOS				
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26				OOS				
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: December

Year: 2014

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS			SECONDARY NOX/CO TEST		
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (If needed)		Tester's Initials
	Nox	CO				CO	Time	
				G-1B				
1	3	2	0:17					WL
2	2	4	0:21					WL
3	3	8	0:22					WL
4	4	8	0:23					WL
5	2	5	1:27					JTR
6	5	27	23:49					JTR
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17				OOS				
18				OOS				
19				OOS				
20				OOS				
21				OOS				
22				OOS				
23				OOS				
24				OOS				
25				OOS				
26				OOS				
27				OOS				
28				OOS				
29				OOS				
30				OOS				
31				OOS				

Condition PQ11493PC5

PLATFORM GRACE
 399CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B Month: JANUARY Year: 2015

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				OOS				
2				OOS				
3				OOS				
4				OOS				
5				OOS				
6				OOS				
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14	1	50	1:51					WL
15	2	48	2:19					WL
16	1	2	0:49					WL
17	1	6	0:52					WL
18	1	20	0:41					WL
19	1	1	0:34					WL
20	1	1	0:41					WL
21	2	27	4:00					MK
22	3	60	2:45					MK
23				OOS				
24				OOS				
25	2	5	7:37					VB
26	2	1	16:09					VB
27	0	1	12:22					MK
28	1	1	5:57					WC
29	0	1	0:50					WC
30	1	1	0:32					WC
31	1	0	1:54					WC

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: March

Year: 2015

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				OOS				
2				OOS				
3				OOS				
4				OOS				
5				OOS				
6				OOS				
7				OOS				
8				OOS				
9				OOS				
10				OOS				
11				OOS				
12				OOS				
13				OOS				
14				OOS				
15				OOS				
16				OOS				
17	0	3	16:48					VB
18	4	0	4:30					MK
19	3	0	4:00					MK
20	3	0	3:40					MK
21	4	0	3:55					MK
22	3	0	4:15					MK
23	3	0	4:30					MK
24	5	0	4:00					MK
25	2	0	9:11					WL
26	2	0	2:28					WC
27	2	0	4:47					WC
28	2	0	4:47					WC
29	2	0	1:18					WC
30	3	7	1:21					WC
31	1	0	5:02					WC

PLATFORM GRACE GENERATOR SERVICE

DATE: 7/26/2014
UNIT: G-1B
HOURS: 24530
MECHANIC: LARRY & SETH

- 1500 HOUR SERVICE
- 3000 HOUR SERVICE
- SERVICE / REPAIR

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO

COMMENTS:

CHANGE OIL FILTERS: YES NO

COMMENTS:

CHANGE CRANK CASE OIL: YES NO

COMMENTS:

REPLACE AIR FILTERS: YES NO PRE FILTERS: YES NO GEN INTAKE FILTERS: YES NO

COMMENTS:

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO

SPINNER II PAPER INSERT: YES NO

COMMENTS: INSPECTED SPINNER FILTER - OK

REPLACE O2 SENSORS: YES NO

COMMENTS:

SERVICE / REPAIR

ON START-UP WE FOUND A LEAK ON THE OIL RETURN LINE. REPLACED SEAL - OK
CLEANED RADIATOR

G-1 & G-6 SERIES PART NUMBERS & QTY

SPARK PLUG: (16) CHAMPION 1224 RL85G O2 SENSOR: (3) BOSCH 75-1521 (4-WIRE) OIL FILTERS: (6) BALDWIN PT670

AIR FILTER: (2) DONALDSON P111098 AIR PRE-FILTER: (2) DONALDSON P607314 GEN INTAKE FILTER: (4) 16 X 25 X 2

SPINNER II 3600: (1) 73358 600 HD/360 PAPER INSERT CAT ELEMENT GASKET: (2) 102" LID: (1) 77"

BELTS: (4) GOODYEAR 5VX1000

SIGNATURE

Larry Hayes

PLATFORM GRACE GENERATOR SERVICE

DATE: 9/6/2014
UNIT: G-1B
HOURS: 25535
MECHANIC: LARRY & SETH

- 1500 HOUR SERVICE
- 3000 HOUR SERVICE
- SERVICE / REPAIR

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO

COMMENTS: _____

CHANGE OIL FILTERS: YES NO

COMMENTS: _____

CHANGE CRANK CASE OIL: YES NO

COMMENTS: _____

REPLACE AIR FILTERS: YES NO

PRE FILTERS: YES NO

GEN INTAKE FILTERS: YES NO

COMMENTS: _____

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO

SPINNER II PAPER INSERT: YES NO

COMMENTS: _____

REPLACE O2 SENSORS: YES NO

COMMENTS: _____

SERVICE / REPAIR

G-1 & G-6 SERIES PART NUMBERS & QTY

SPARK PLUG:(16) CHAMPION 1224 RLB5G O2 SENSOR: (3) BOSCH 75-1521 (4-WIRE) OIL FILTERS: (6) BALDWIN PT670

AIR FILTER: (2) DONALDSON P111098 AIR PRE-FILTER: (2) DONALDSON P607314 GEN INTAKE FILTER: (4) 16 X 25 X 2

SPINNER II 3600: (1) 73358 600 HD/360 PAPER INSERT CAT ELEMENT GASKET: (2) 102" LID: (1) 77"

BELTS: (4) GOODYEAR 5VX1000

SIGNATURE

Larry Hayes

PLATFORM GRACE GENERATOR SERVICE

DATE: 1/24/2015
UNIT: G-1B
HOURS: 27577
MECHANIC: LARRY, DAVE, VICTOR

- 1500 HOUR SERVICE
- 3000 HOUR SERVICE
- SERVICE / REPAIR

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO
COMMENTS: _____
CHANGE OIL FILTERS: YES NO
COMMENTS: _____
CHANGE CRANK CASE OIL: YES NO
COMMENTS: _____
REPLACE AIR FILTERS: YES NO PRE FILTERS: YES NO GEN INTAKE FILTERS: YES NO
COMMENTS: _____

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO SPINNER II PAPER INSERT: YES NO
COMMENTS: _____
REPLACE O2 SENSORS: YES NO
COMMENTS: _____

SERVICE / REPAIR

REPAIRED 3 - COLD WATER LEAKS ON COOLANT PIPING.

G-1 & G-6 SERIES PART NUMBERS & QTY

SPARK PLUG: (16) CHAMPION 1224 RL85G O2 SENSOR: (3) BOSCH 75-1521 (4-WIRE) OIL FILTERS: (6) BALDWIN PT670
AIR FILTER: (2) DONALDSON P111098 AIR PRE-FILTER: (2) DONALDSON P607314 GEN INTAKE FILTER: (4) 16 X 25 X 2
SPINNER II 3600: (1) 73358 600 HD/360 PAPER INSERT CAT ELEMENT GASKET: (2) 102" LID: (1) 77"
BELTS: (4) GOODYEAR 5VX1000

SIGNATURE *Larry Hayes*

ENGINE DATA FOR THE WAUKESHA ENGINE (G-03)

Engine Manufacturer: Waukesha

Model No.: F3521G (SI)

Serial No.: 289729

Engine Location: Turbine room, southwest corner of platform, production deck

Summary of Maintenance and Testing Reports are Included for the Following:

- No service performed. Engine was out of service during reporting period.

Source Test Report: None

ENGINE DATA FOR THE CATERPILLAR ENGINE (G-6A)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Engine Location: Drilling Deck

Summary of Maintenance and Testing Reports are Included for the Following:

- No service performed. Unit was out of service during reporting period.

Source Test Report: None

ENGINE DATA FOR THE CATERPILLAR ENGINE (G-6B)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Engine Location: Drilling Deck

Summary of Maintenance and Testing Reports are Included for the Following:

- No service performed. Unit was out of service during reporting period.

Source Test Report: None

ENGINE DATA FOR THE CATERPILLAR ENGINE (G-6C)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Engine Location: Drilling Deck

Summary of Maintenance and Testing Reports are Included for the Following:

- No service performed. Unit was out of service during reporting period.

Source Test Report: None



Letter of Conformance

January 28, 2015

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to
VENOCO/ PLATFORM GAIL AND PLATFORM GRACE FROM 1/1/2014-12/31/2014

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by Maxum Petroleum. The sulfur Content is guaranteed to be less than .0015%. (15PPM) The high heat content is typically in the 19,950 - 20,200 BTU per pound range.

Hope Bowles

General Manager
SC Fuels
Oxnard Division
Office (805) 299-1219
bowlesh@scfuels.com



Oilfield Environmental and Compliance, INC.

Venoco, Inc. - Carpinteria 5675 Carpinteria Ave. Carpinteria CA, 93013	Project: Annual SCAQMD Samples Project Number: Platform Gail & Grace Project Manager: Pat Corcoran	Reported: 19-Feb-15 09:43
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**Plt. Grace Inlet to T-13
1500648-05 (Produced Water)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Oilfield Environmental and Compliance

ROC by ASTM E-260-85 /8260M/5030

ROC (C3-C10)	ND	50	ug/L	1	B5B0419	14-Feb-15	14-Feb-15	ASTM E260 Mod	TPH-Samp
<i>Surrogate: Dibromofluoromethane</i>		104 %	70-130		"	"	"	"	
<i>Surrogate: Toluene-d8</i>		101 %	70-130		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		96.4 %	70-130		"	"	"	"	

**Plt. Grace Inlet to T-2
1500648-06 (Produced Water)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Oilfield Environmental and Compliance

ROC by ASTM E-260-85 /8260M/5030

ROC (C3-C10)	ND	50	ug/L	1	B5B0419	14-Feb-15	14-Feb-15	ASTM E260 Mod	TPH-Samp
<i>Surrogate: Dibromofluoromethane</i>		105 %	70-130		"	"	"	"	
<i>Surrogate: Toluene-d8</i>		102 %	70-130		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		96.4 %	70-130		"	"	"	"	

Oilfield Environmental and Compliance

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

307 Roemer Way, Suite 300, Santa Maria, CA 93454

www.oecusa.com

TEL: (805) 922-4772
FAX: (805) 925-3376

CLIENT OEC
PROJECT NAME: Oilfied Gas- SCAQMD
LABORATORY NO: 15-101
SAMPLING DATE: February 12, 2015
RECEIVING DATE: February 13, 2015
ANALYSIS DATE: February 13, 2015
REPORT DATE: February 16, 2015

Laboratory Analysis Report

GRACE

Analysis Method		SCAQMD 307-91			
Detection Limits		0.1 PPMV			
Analyte	Client ID	Plt. Gail Fuel Gas	Plt. Gail Fuel Gas Duplicate	Plt. Grace Fuel Gas	Plt. Grace Fuel Gas Duplicate
	OEC ID	1500648-01	1500648-02	1500648-03	1500648-04
	Sampling Date	2/12/15	2/12/15	2/12/15	2/12/15
	Lab ID	04415-1	04415-2	04415-3	04415-4
	Units	PPMV	PPMV	PPMV	PPMV
Hydrogen Sulfide		1.89	2.72	17.1	8.56
Carbonyl Sulfide		3.56	3.80	0.32	0.25
Methyl Mercaptan		1.33	1.46	0.16	0.16
Ethyl Mercaptan		0.61	0.60	0.07	0.09
Un-Identified S Compounds		3.92	4.54	1.28	1.41
TRS as H2S		11.3	13.1	19.0	10.5

TRS: Total Reduced Sulfur as Hydrogen Sulfide



Dr. Andrew Kitto
President

