



May 6, 2020

Mr. Keith Macias  
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, 2019 through March 31, 2020**

Dear Mr. Macias:

Pursuant to the requirements of the Title V Part 70 Federal Operating Permit No. 1493, Beacon West Energy Group, LLC is submitting the Platform Grace Part 70 Annual Compliance Certification Report for the reporting period of April 1, 2019 through March 31, 2020.

If you have questions or need additional information, please call me at (805) 395-9676.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Garnett", is written over the word "Sincerely,".

John Garnett  
EHSR Advisor

Encl.

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



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.

Signature and Title of Responsible Official:   Title: <u>EVP-EASR</u>	Date: <u>5/4/2020</u>
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Time Period Covered by Compliance Certification  <u>04 / 01 / 2019</u> (MM/DD/YY) to <u>03 / 31 / 2020</u> (MM/DD/YY)
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# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 to 03 / 31 / 20

<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&amp;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 &lt; 5mg/l. See <i>attached ROC analytical results for T-2 and T-13.</i></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<sub>x</sub>, 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 / 19 to 03 / 31 / 20

<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 / 19 to 03 / 31 / 20

<p>A. Attachment # or Permit Condition #: <u>ATCM ENG.N3</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: All stationary compression ignition engines</p>	<p>Periodic</p>
<p>C. Method of monitoring: Annual certification that monthly fuel consumption records and fuel type records are maintained. <b>ATCM emission standards are not federally enforceable.</b></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> *If yes, attach Deviation Summary Form</p>	

<p>A. Attachment # or Permit Condition #: <u>PO1493PC1-Condition No. 1</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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>Periodic</p>
<p>C. Method of monitoring: Monthly records of throughputs and fuel consumption. Annual compliance certification that these records are maintained. <b>See attached 12-Month Rolling data.</b></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> *If yes, attach Deviation Summary Form</p>	

<p>A. Attachment # or Permit Condition #: <u>PO1493PC1-Condition No. 2</u></p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Platform Grace Additional Requirements - Generators shall only burn natural gas and no other fuel.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Routine surveillance to ensure only natural gas is used. Annual compliance that only natural gas was burned in generators.</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> *If yes, attach Deviation Summary Form</p>	



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 to 03 / 31 / 20

<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. <b>See attached 12-month rolling data.</b></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 / 19 to 03 / 31 / 20

<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 / 19 to 03 / 31 / 20

<p>A. Attachment # or Permit Condition #: PO1493PC2-Conditions Nos. 1, 2 and 5</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. <b>See attached 12-month rolling data.</b></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. 3 and 4</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 / 19 to 03 / 31 / 20

<p>A. Attachment # or Permit Condition #: PO1493PC4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Tanks designated as out of service on the permit are shut down and cannot be operated.</p>	<p>Periodic</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>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> *If yes, attach Deviation Summary Form</p>	

<p>A. Attachment # or Permit Condition #: PO1493PC5</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO<sub>x</sub>, ROC, and CO emission limits. CAM Requirements</p>	<p>Biennial</p>
<p>C. Method of monitoring: Biennial source test of the G-03 generator using: ARB Method 100 for NO<sub>x</sub>, 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<sub>x</sub> 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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100, EPA Method 25</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> *If yes, attach Deviation Summary Form</p>	

<p>A. Attachment # or Permit Condition #: PO1493PC6</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Crane fuel consumption</p>	<p>Annual</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. <b>See attached rolling 12-month data.</b></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> *If yes, attach Deviation Summary Form</p>	



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 to 03 / 31 / 20

<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 / 19 to 03 / 31 / 20

<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> *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% CO<sub>2</sub> 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> *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: Records are maintained substantiating that only PUC natural gas is combusted at the facility.</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> *If yes, attach Deviation Summary Form</p>	



# ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 to 03 / 31 / 20

<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&amp;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 / 19 to 03 / 31 / 20

<p>A. Attachment # or Permit Condition #: <u>71.4.B.3</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: 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: 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>  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>74.6</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: 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: 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>  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>74.10</u></p>	<p>D. Frequency of monitoring: Daily, Weekly, Quarterly, Annually</p>
<p>B. Description: 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: 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>  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 / 19 to 03 / 31 / 20

<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<sub>x</sub> 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 / 19 to 03 / 31 / 20

<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 / 19 to 03 / 31 / 20

<p>A. Attachment # or Permit Condition #: PO1493PC7</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO<sub>x</sub>, ROC, and CO emission limits. CAM Requirements. G-6A, G-6B, G-6C, G-1A, G-1B, G-1C</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Biennial source test of the generators using the following methods: ARB Method 100 for NO<sub>x</sub>, 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<sub>x</sub> measurements utilizing a portable analyzer are being recorded,</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>I</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40CFR63ZZZN3</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: 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: 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> 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 #: 40CFR63ZZZN4</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: 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: 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>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 to 03 / 31 / 20

<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>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N): _____  G. Compliance Status? (C or I): _____  H. *Excursions, exceedances, or other non-compliance? (Y or N): _____  *If yes, attach Deviation Summary Form</p>



# ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 2019 (MM/DD/YY) to 03 / 31 / 2020 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p>PO1493PC7 cond. 5</p>	<p>B. Equipment description:</p> <p>Stationary Natural Gas Fired IC Engine G-1B</p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin: 7/28/2019 23:11 _____</p> <p>End: __7/29/2019 00:51 _____</p> <p>When Discovered: Date &amp; Time</p> <p>7/28/2019 23:11__</p>
<p>D. Parameters monitored:</p> <p>CO</p>	<p>E. Limit:</p> <p>71</p>	<p>F. Actual:</p> <p>73</p>
<p>G. Probable Cause of Deviation:</p> <p>Not determined</p>		<p>H. Corrective actions taken:</p> <p>Retested in compliance the following hour</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date &amp; Time</p> <p>When Discovered: Date &amp; Time</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 &amp; Time</p> <p>Begin:</p> <p>End: When Discovered: Date &amp; Time</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>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

A. Emission Unit Description: Generator G-1A			B. Pollutant: NOx
C. Measured Emission Rate: 2.1 ppmv @ 15% O2	D. Limited Emission Rate: 5 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 2/11/2020

A. Emission Unit Description: Generator G-1A			B. Pollutant: CO
C. Measured Emission Rate: 45.0 ppmv @ 15% O2	D. Limited Emission Rate: 71 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 2/11/2020

A. Emission Unit Description: Generator G-1A			B. Pollutant: ROC
C. Measured Emission Rate: <0.5 ppmv @ 15% O2	D. Limited Emission Rate: 14 ppmv @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 2/11/2020

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:



# ANNUAL COMPLIANCE CERTIFICATION

## SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

A. Emission Unit Description: Generator G-1B			B. Pollutant: NO <sub>x</sub>
C. Measured Emission Rate: 2.9 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 5 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description: Generator G-1B			B. Pollutant: CO
C. Measured Emission Rate: 21.0 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 71 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description: Generator G-1B			B. Pollutant: ROC
C. Measured Emission Rate: <0.5 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 2.9 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:



## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

A. Emission Unit Description: Generator G-1B			B. Pollutant: NO <sub>x</sub>
C. Measured Emission Rate: 2.9 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 5 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description: Generator G-1B			B. Pollutant: CO
C. Measured Emission Rate: 21.0 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 71 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description: Generator G-1B			B. Pollutant: ROC
C. Measured Emission Rate: <0.52 ppmv @ 15% O <sub>2</sub>	D. Limited Emission Rate: 14 ppmv @ 15% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 2079 Report # 220-011	F. Test Date: 02/11/2020

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

Platform Grace  
PTO No. 1493 Equipment Usage

Rolling 12-Months Ending:  
Apr-19

Equipment	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	43.0	53.0	86.0	55.0	365.0	314.0	310.0	276.0	404.0	287.0	259.0	178.0	Gall/mo	2,610.0	N/A	Gallyr
South Crane	69.0	0.0	85.0	0.0	171.0	117.0	145.0	170.0	107.0	235.0	76.0	49.0	Gall/mo	1,224.0	N/A	Gallyr
<b>Crane Total</b>	<b>112.0</b>	<b>53.0</b>	<b>151.0</b>	<b>55.0</b>	<b>536.0</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>Gall/mo</b>	<b>3,834</b>	<b>13,344</b>	<b>Gallyr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	314.0	309.0	279.0	279.0	270.0	279.0	270.0	279.0	279.0	252.0	279.0	270.0	MSCF/mo	3.36	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	4.0	0.0	0.0	0.0	0.0	0.0	45.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>314.0</b>	<b>309.0</b>	<b>283.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>MSCF/mo</b>	<b>3.41</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	58.0	0.0	0.0	0.0	195.0	0.0	0.0	30.0	208.0	0.0	451.0	0.0	Gall/mo	942.00	55,900	Gallyr
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	15.0	0.0	2.5	11.0	31.5	11.0	2.5	14.0	22.0	5.0	18.3	0.0	Gall/mo	132.80	7,315	Gallyr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.0	13.0	0.0	0.0	Gall/mo	31.00	Exempt	Gallyr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gall/mo	0.00	Exempt	Gallyr
<b>Production Engines</b>																
G-1A	2,824.0	2,620.0	2,561.0	802.0	1,296.0	667.0	2,050.0	0.0	1,843.1	259.3	153.1	106.9	MSCF/mo	15,204.40	N/A	MMSCF/yr
G-1B	0.0	0.0	0.0	1,823.0	1,214.0	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	MSCF/mo	6,564.30	N/A	MMSCF/yr
G-1C	0.0	0.0	0.0	0.0	0.0	0.0	1,489.0	1,972.0	931.7	1,860.3	492.6	320.9	MSCF/mo	7,066.48	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,824.0</b>	<b>2,620.0</b>	<b>2,561.0</b>	<b>2,625.0</b>	<b>2,512.0</b>	<b>667.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>MSCF/mo</b>	<b>21.77</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gall/mo	0.00	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	Gall/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gall/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Total Coatings	0.0	0.0	0.0	0.0	75.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gall/mo	75.38	Exempt	Gallyr
<b>Boats:</b>																
Crew Boat Fuel:	1,326.8	1,237.6	1,852.8	1,726.6	2,552.6	2,200.0	1,840.0	2,268.8	1,910.0	1,836.6	1,600.0	1,988.8	Gall/mo	22,343	N/A	Gallyr
Work Boat Fuel:	2,321.9	1,082.9	1,015.7	1,512.5	2,233.5	1,925.0	1,610.0	1,145.2	1,671.3	1,807.0	910.0	1,295.7	Gall/mo	18,331	N/A	Gallyr
<b>Total Boat Fuel:</b>	<b>3,648.7</b>	<b>2,320.5</b>	<b>2,868.5</b>	<b>3,241.1</b>	<b>4,786.1</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>Gall/mo</b>	<b>40,673</b>	<b>96,792</b>	<b>Gallyr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.06	0.04	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.05	Tons/mo	0.67	1.90	Tons/yr at 33.15 lbs/MGal
NOx	1.02	0.65	0.80	0.91	1.34	1.16	0.97	0.96	1.00	0.97	0.70	0.92	Tons/mo	11.41	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.04	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.06	Tons/mo	0.68	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	Tons/mo	0.15	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.19	0.12	0.15	0.17	0.24	0.21	0.18	0.17	0.18	0.18	0.13	0.17	Tons/mo	2.07	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gallyr, with any producing wells, limit is 7,344 gallyr

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)

Platform Grace  
PTO No. 1493 Equipment Usage

Rolling 12-Months Ending:  
May-19

Equipment	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	53.0	66.0	55.0	385.0	314.0	310.0	276.0	404.0	287.0	259.0	178.0	198.0	Gal/mo	2,763.0	N/A	Gal/yr
South Crane	0.0	85.0	0.0	171.0	117.0	145.0	170.0	107.0	235.0	76.0	49.0	345.0	Gal/mo	1,500.0	N/A	Gal/yr
<b>Crane Total</b>	<b>53.0</b>	<b>151.0</b>	<b>55.0</b>	<b>556.0</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>Gal/mo</b>	<b>4,263</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	308.0	279.0	279.0	270.0	279.0	270.0	279.0	279.0	252.0	279.0	270.0	279.0	MSCF/mo	3.32	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	4.0	0.0	0.0	0.0	0.0	0.0	45.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>308.0</b>	<b>283.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.37</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	0.0	0.0	185.0	0.0	0.0	30.0	208.0	0.0	451.0	0.0	0.0	Gal/mo	684.00	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	2.5	11.0	31.5	11.0	2.5	14.0	22.0	5.0	18.3	0.0	3.0	Gal/mo	120.80	7,315	Gal/yr
P-18 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.0	13.0	0.0	0.0	14.0	Gal/mo	45.00	Exempt	Gal/yr
Portable Equipment	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	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	2,620.0	2,561.0	802.0	1,298.0	687.0	2,050.0	0.0	1,843.1	259.3	153.1	106.9	45.4	MSCF/mo	12,425.80	N/A	MMSCF/yr
G-1B	0.0	0.0	1,823.0	1,214.0	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	MSCF/mo	6,650.60	N/A	MMSCF/yr
G-1C	0.0	0.0	0.0	0.0	0.0	1,489.0	1,972.0	931.7	1,860.3	492.6	320.9	2,385.2	MSCF/mo	9,431.64	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,620.0</b>	<b>2,561.0</b>	<b>2,625.0</b>	<b>2,512.0</b>	<b>687.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>MSCF/mo</b>	<b>19,09</b>	<b>60,000</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Total Coatings	0.0	0.0	0.0	75.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	75.38	Exempt	Gal/yr
<b>Boats:</b>																
Crew Boat Fuel:	1,237.6	1,852.8	1,728.6	2,552.6	2,200.0	1,840.0	2,268.8	1,910.0	1,836.6	1,600.0	1,968.8	1,540.0	Gal/mo	22,556	N/A	Gal/yr
Work Boat Fuel:	1,082.9	1,015.7	1,512.5	2,239.5	1,925.0	1,610.0	1,145.2	1,671.3	1,607.0	910.0	1,295.7	2,895.0	Gal/mo	18,704	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>2,320.5</b>	<b>2,868.5</b>	<b>3,241.1</b>	<b>4,792.1</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,264.5</b>	<b>4,235.0</b>	<b>Gal/mo</b>	<b>41,260</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.04	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.05	0.07	Tons/mo	0.68	1.90	Tons/yr at 33.15 lbs/MGal
NOX	0.65	0.60	0.91	1.34	1.16	0.97	0.96	1.00	0.97	0.70	0.92	1.19	Tons/mo	11.57	32.11	Tons/yr at 561.00 lbs/MGal
PW	0.04	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.06	0.07	Tons/mo	0.69	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.01	0.01	0.01	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.02	Tons/mo	0.15	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.12	0.15	0.17	0.24	0.21	0.18	0.17	0.18	0.18	0.13	0.17	0.22	Tons/mo	2.10	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gal (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Jun-19**

Equipment	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	66.0	55.0	365.0	314.0	310.0	276.0	404.0	287.0	259.0	173.0	196.0	143.0	Gall/mo	2,853.0	N/A	Gall/yr
South Crane	85.0	0.0	171.0	117.0	145.0	170.0	107.0	235.0	76.0	49.0	345.0	403.5	Gall/mo	1,903.5	N/A	Gall/yr
<b>Crane Total</b>	<b>151.0</b>	<b>55.0</b>	<b>536.0</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>Gall/mo</b>	<b>4,757</b>	<b>13,344</b>	<b>Gall/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	279.0	270.0	279.0	270.0	279.0	279.0	252.0	279.0	270.0	279.0	270.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	4.0	0.0	0.0	0.0	0.0	0.0	45.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>283.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	0.0	195.0	0.0	0.0	30.0	208.0	0.0	451.0	0.0	0.0	0.0	Gall/mo	884.0	55,900	Gall/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	2.5	11.0	31.5	11.0	2.5	14.0	22.0	5.0	18.3	0.0	3.0	34.6	Gall/mo	155.40	7,315	Gall/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	0.0	18.0	13.0	0.0	0.0	14.0	11.0	Gall/mo	56.00	Exempt	Gall/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	Gall/mo	2,479.20	Exempt	Gall/yr
<b>Production Engines</b>																
G-1A	2,561.0	802.0	1,288.0	687.0	2,050.0	0.0	1,843.1	259.3	153.1	106.9	45.4	198.9	MSCF/mo	10,004.70	N/A	MMSCF/yr
G-1B	0.0	1,823.0	1,214.0	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	MSCF/mo	7,687.90	N/A	MMSCF/yr
G-1C	0.0	0.0	0.0	0.0	1,489.0	1,972.0	931.7	1,860.3	492.6	320.9	2,365.2	2,255.0	MSCF/mo	11,686.64	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,561.0</b>	<b>2,625.0</b>	<b>2,512.0</b>	<b>687.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>MSCF/mo</b>	<b>17.69</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gall/mo	0.00	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	Gall/mo	0.00	N/A	Tons/yr ROC at 6.43 lb/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gall/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>75.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gall/mo</b>	<b>75.38</b>	<b>Exempt</b>	<b>Gall/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	1,652.6	1,728.6	2,552.6	2,200.0	1,840.0	2,268.8	1,910.0	1,836.6	1,600.0	1,868.8	1,540.0	2,386.8	Gall/mo	23,705	N/A	Gall/yr
Work Boat Fuel:	1,015.7	1,512.5	2,233.5	1,925.0	1,610.0	1,145.2	1,671.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	Gall/mo	19,709	N/A	Gall/yr
<b>Total Boat Fuel:</b>	<b>2,668.5</b>	<b>3,241.1</b>	<b>4,786.1</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,264.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>Gall/mo</b>	<b>43,414</b>	<b>96,792</b>	<b>Gall/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.05	0.07	0.07	Tons/mo	0.72	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.80	0.91	1.34	1.16	0.97	0.96	1.00	0.97	0.70	0.92	1.19	1.26	Tons/mo	12.18	32.11	Tons/yr at 661.00 lbs/MGal
PM	0.05	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.06	0.07	0.07	Tons/mo	0.73	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	Tons/mo	0.16	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.15	0.17	0.24	0.21	0.18	0.17	0.18	0.18	0.13	0.17	0.22	0.23	Tons/mo	2.21	5.84	Tons/yr at 102.00 lbs/MGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gallyr, with any producing wells, limit is 7,344 gallyr

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)



**Platform Grace  
PTO No. 1493 Equipment Usage**

**Rolling 12-Months Ending:  
Jul-19**

Equipment	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	55.0	365.0	314.0	310.0	276.0	404.0	287.0	259.0	178.0	196.0	143.0	616.4	Gal/mo	3,403.4	N/A	Gal/yr
South Crane	0.0	171.0	117.0	145.0	170.0	107.0	235.0	76.0	49.0	345.0	403.5	410.6	Gal/mo	2,229.1	N/A	Gal/yr
<b>Crane Total</b>	<b>55.0</b>	<b>536.0</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>Gal/mo</b>	<b>5,633</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	270.0	279.0	270.0	279.0	279.0	252.0	279.0	270.0	279.0	270.0	279.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.09	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	195.0	0.0	0.0	30.0	208.0	0.0	451.0	0.0	0.0	0.0	72.0	Gal/mo	956.00	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
49 BHP Starter Engine	11.0	31.5	11.0	2.5	14.0	22.0	3.0	18.3	3.0	3.0	34.6	5.0	Gal/mo	197.90	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	0.0	18.0	13.0	0.0	0.0	14.0	11.0	0.0	Gal/mo	56.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	1,816.0	Gal/mo	4,295.20	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	802.0	1,298.0	687.0	2,050.0	0.0	1,843.1	259.3	153.1	106.9	45.4	198.9	0.0	MSCF/mo	7,443.70	N/A	MMSCF/yr
G-1B	1,823.0	1,214.0	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	MSCF/mo	9,105.15	N/A	MMSCF/yr
G-1C	0.0	0.0	0.0	1,489.0	1,972.0	931.7	1,680.3	492.6	320.9	2,365.2	2,256.0	3,533.2	MSCF/mo	15,219.79	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,625.0</b>	<b>2,512.0</b>	<b>687.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>MSCF/mo</b>	<b>16.55</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Z-Sol	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	4,300	Gal/yr
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Total Coatings	0.0	75.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	75.38	Exempt	Gal/yr
<b>Boats:</b>																
Crew Boat Fuel:	1,728.6	2,552.6	2,200.0	1,640.0	2,268.8	1,910.0	1,836.6	1,600.0	1,988.8	1,540.0	2,386.8	1,883.0	Gal/mo	23,735	N/A	Gal/yr
Work Boat Fuel:	1,512.5	2,233.5	1,925.0	1,610.0	1,145.2	1,671.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	962.5	Gal/mo	19,656	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,241.1</b>	<b>4,786.1</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>Gal/mo</b>	<b>43,391</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.05	0.07	0.07	0.05	Tons/mo	0.72	1.90	Tons/yr at 33.15 lbs/MGal
NOX	0.91	1.34	1.16	0.97	0.96	1.00	0.97	0.70	0.92	1.19	1.26	0.80	Tons/mo	12.17	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.05	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.06	0.07	0.07	0.05	Tons/mo	0.73	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.01	0.02	0.02	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	0.17	0.24	0.21	0.18	0.17	0.18	0.18	0.13	0.17	0.22	0.23	0.15	Tons/mo	2.21	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gal (PTO No. 1494)

Platform Grace  
PTO No. 1493 Equipment Usage

Rolling 12-Months Ending:  
Aug-19

Equipment	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	365.0	314.0	310.0	276.0	404.0	287.0	259.0	178.0	196.0	143.0	616.4	588.1	Gal/mo	3,936.5	N/A	Gal/yr
South Crane	174.0	117.0	145.0	170.0	107.0	235.0	76.0	49.0	345.0	403.5	410.6	560.0	Gal/mo	2,789.1	N/A	Gal/yr
<b>Crane Total</b>	<b>536.0</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>Gal/mo</b>	<b>6,726</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	270.0	279.0	270.0	279.0	279.0	252.0	279.0	270.0	279.0	270.0	279.0	279.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	195.0	0.0	0.0	30.0	208.0	0.0	451.0	0.0	0.0	0.0	72.0	0.0	Gal/mo	956.00	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	31.5	11.0	2.5	14.0	22.0	5.0	18.3	3.0	34.8	34.8	5.0	0.0	Gal/mo	146.90	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	0.0	18.0	13.0	0.0	0.0	14.0	11.0	0.0	15.0	Gal/mo	71.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	1,816.0	2,846.8	Gal/mo	7,142.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	1,296.0	687.0	2,050.0	0.0	1,843.1	259.3	153.1	106.9	45.4	198.9	0.0	240.4	MSCF/mo	6,882.10	N/A	MMSCF/yr
G-1B	1,214.0	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	MSCF/mo	7,819.15	N/A	MMSCF/yr
G-1C	0.0	0.0	1,489.0	1,972.0	931.7	1,860.3	492.6	320.9	2,385.2	2,255.0	3,533.2	3,028.1	MSCF/mo	18,247.89	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,512.0</b>	<b>687.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>MSCF/mo</b>	<b>14.70</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Z-Sol	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	4,300	Gal/yr
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Total Coatings	75.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	75.38	Exempt	Gal/yr
<b>Boats:</b>																
Crew Boat Fuel:	2,552.6	2,200.0	1,840.0	2,268.8	1,910.0	1,836.6	1,600.0	1,986.8	1,540.0	2,366.8	1,663.0	2,176.0	Gal/mo	24,183	N/A	Gal/yr
Work Boat Fuel:	2,233.5	1,925.0	1,610.0	1,145.2	1,671.3	1,807.0	910.0	1,295.7	2,695.0	2,088.5	962.5	1,904.0	Gal/mo	20,048	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>4,786.1</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,643.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,645.5</b>	<b>4,080.0</b>	<b>Gal/mo</b>	<b>44,230</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.08	0.07	0.06	0.06	0.06	0.06	0.04	0.05	0.07	0.07	0.05	0.07	Tons/mo	0.73	1.90	Tons/yr at 33.15 lbs/MGal
NOX	1.34	1.16	0.97	0.96	1.00	0.97	0.70	0.92	1.19	1.26	0.80	1.14	Tons/mo	12.41	32.11	Tons/yr at 51.00 lbs/MGal
PW	0.06	0.07	0.06	0.06	0.06	0.06	0.04	0.06	0.07	0.07	0.05	0.07	Tons/mo	0.74	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.02	Tons/mo	0.17	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.24	0.21	0.18	0.17	0.18	0.18	0.13	0.17	0.22	0.23	0.15	0.21	Tons/mo	2.26	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Sep-19**

Equipment	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	314.0	310.0	276.0	404.0	287.0	259.0	178.0	196.0	143.0	616.4	588.1	349.1	Gal/mo	3,920.6	N/A	Gal/yr
South Crane	117.0	145.0	170.0	107.0	235.0	78.0	49.0	345.0	403.5	410.6	560.0	93.0	Gal/mo	2,711.1	N/A	Gal/yr
<b>Crane Total</b>	<b>431.0</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>Gal/mo</b>	<b>6,632</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	270.0	279.0	279.0	252.0	279.0	270.0	279.0	270.0	279.0	279.0	270.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
			Pilot Purge is accounted for in calculation of Planned Flaring (Meter GR-81 - Meter GR-83)													
<b>Flare Gas Total</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	0.0	30.0	206.0	0.0	451.0	0.0	0.0	0.0	72.0	0.0	0.0	Gal/mo	761.00	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	11.0	2.5	14.0	22.0	5.0	18.3	3.0	34.6	5.0	5.0	0.0	0.0	Gal/mo	115.40	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	0.0	18.0	13.0	0.0	0.0	14.0	11.0	0.0	15.0	0.0	Gal/mo	71.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	1,816.0	2,846.8	0.0	Gal/mo	7,142.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	687.0	2,050.0	0.0	1,843.1	259.3	153.1	1,069.9	45.4	198.9	0.0	240.4	0.0	MSCF/mo	5,584.10	N/A	MMSCF/yr
G-1B	0.0	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,560.2	MSCF/mo	10,185.35	N/A	MMSCF/yr
G-1C	0.0	1,489.0	1,972.0	931.7	1,860.3	482.6	320.9	2,365.2	2,255.0	3,533.2	3,028.1	0.0	MSCF/mo	18,247.89	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>687.0</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,560.2</b>	<b>MSCF/mo</b>	<b>15,177</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
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	126.72	MMSCF/yr
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
													Gal/mo	0.00	4,300	Gal/yr
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>Gal/mo</b>	<b>11.70</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	2,200.0	1,840.0	2,268.8	1,910.0	1,836.8	1,600.0	1,988.8	1,540.0	2,386.8	1,863.0	2,176.0	2,447.0	Gal/mo	24,077	N/A	Gal/yr
Work Boat Fuel:	1,925.0	1,610.0	1,145.2	1,671.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	962.5	1,904.0	2,141.1	Gal/mo	19,955	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>4,125.0</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>Gal/mo</b>	<b>44,032</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.07	0.06	0.06	0.06	0.06	0.04	0.05	0.07	0.07	0.05	0.07	0.08	Tons/mo	0.79	1.90	Tons/yr at 33.15 lbs/MGal
NOX	1.16	0.97	0.96	1.00	0.97	0.70	0.92	1.19	1.26	0.80	1.14	1.29	Tons/mo	12.35	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.07	0.06	0.06	0.06	0.06	0.04	0.06	0.07	0.07	0.05	0.07	0.08	Tons/mo	0.74	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.02	0.02	Tons/mo	0.17	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.21	0.18	0.17	0.18	0.18	0.13	0.17	0.22	0.23	0.15	0.21	0.23	Tons/mo	2.25	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace  
PTO No. 1493 Equipment Usage**

Rolling 12-Months Ending:  
Oct-19

Equipment	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	310.0	276.0	404.0	287.0	259.0	178.0	196.0	143.0	616.4	588.1	349.1	499.1	Gal/mo	4,105.7	N/A	Gal/yr
South Crane	145.0	170.0	107.0	235.0	76.0	49.0	345.0	403.5	410.6	560.0	93.0	179.0	Gal/mo	2,773.1	N/A	Gal/yr
<b>Crane Total</b>	<b>455.0</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>Gal/mo</b>	<b>6,879</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	270.0	279.0	279.0	252.0	279.0	270.0	279.0	270.0	279.0	279.0	270.0	279.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>270.0</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	30.0	208.0	0.0	451.0	0.0	0.0	0.0	72.0	0.0	0.0	0.0	Gal/mo	761.00	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	59.10	MMSCF/yr
48 BHP Starter Engine	2.5	14.0	22.0	5.0	18.3	0.0	3.0	34.6	5.0	3.0	0.0	0.0	Gal/mo	104.40	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	18.0	13.0	0.0	0.0	14.0	11.0	0.0	15.0	0.0	0.0	Gal/mo	71.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	1,616.0	2,846.8	0.0	0.0	Gal/mo	7,142.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	2,050.0	0.0	1,843.1	259.3	153.1	106.9	45.4	196.9	0.0	240.4	0.0	2,146.1	MSCF/mo	7,043.20	N/A	MMSCF/yr
G-1B	0.0	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	MSCF/mo	10,764.75	N/A	MMSCF/yr
G-1C	1,489.0	1,972.0	931.7	1,860.3	492.6	320.9	2,365.2	3,028.1	3,533.2	3,028.1	0.0	0.0	MSCF/mo	18,247.89	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,050.0</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,560.2</b>	<b>2,725.5</b>	<b>MSCF/mo</b>	<b>17.81</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Z-Sol	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	4,300	Gal/yr
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>2.1</b>	<b>Gal/mo</b>	<b>13.80</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	1,840.0	2,268.8	1,910.0	1,836.6	1,600.0	1,988.8	1,540.0	2,366.8	1,883.0	2,176.0	2,447.0	2,627.2	Gal/mo	24,504	N/A	Gal/yr
Work Boat Fuel:	1,610.0	1,145.2	1,671.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	962.5	1,904.0	2,141.1	2,298.6	Gal/mo	20,329	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,450.0</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>Gal/mo</b>	<b>44,833</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.06	0.06	0.06	0.06	0.04	0.05	0.07	0.07	0.05	0.07	0.08	0.08	Tons/mo	0.74	1.90	Tons/yr at 33.15 lbs/MGal
NOX	0.97	0.96	1.00	0.92	0.70	1.29	1.19	1.26	0.80	1.14	1.29	1.38	Tons/mo	12.58	32.11	Tons/yr at 561.00 lbs/MGal
PW	0.06	0.06	0.06	0.06	0.04	0.06	0.07	0.07	0.05	0.07	0.08	0.08	Tons/mo	0.76	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	0.02	0.02	0.02	Tons/mo	0.17	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.18	0.17	0.18	0.18	0.13	0.17	0.22	0.23	0.15	0.21	0.23	0.25	Tons/mo	2.29	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Nov-19**

Equipment	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	276.0	404.0	287.0	259.0	178.0	196.0	143.0	616.4	588.1	349.1	499.1	693.7	Gal/mo	4,489.4	N/A	Gal/yr
South Crane	170.0	107.0	235.0	76.0	49.0	345.0	403.5	410.6	560.0	93.0	179.0	260.1	Gal/mo	2,868.2	N/A	Gal/yr
<b>Crane Total</b>	<b>446.0</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>953.8</b>	<b>Gal/mo</b>	<b>7,378</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	279.0	252.0	279.0	270.0	279.0	270.0	279.0	279.0	270.0	279.0	270.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>279.0</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	30.0	208.0	0.0	451.0	0.0	0.0	0.0	72.0	0.0	0.0	0.0	0.0	Gal/mo	761.00	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	14.0	22.0	5.0	18.3	0.0	3.0	34.6	5.0	0.0	0.0	0.0	10.0	Gal/mo	111.90	7,315	Gal/yr
P-19 Firewater Pump	0.0	18.0	13.0	0.0	0.0	14.0	11.0	15.0	0.0	0.0	0.0	18.0	Gal/mo	89.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	0.0	2,479.2	1,816.0	2,846.8	0.0	0.0	0.0	Gal/mo	7,142.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	0.0	1,843.1	259.3	153.1	106.9	45.4	196.9	0.0	240.4	0.0	2,146.1	1,936.2	MSCF/mo	6,931.40	N/A	MMSCF/yr
G-1B	0.0	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	1,843.2	MSCF/mo	12,607.95	N/A	MMSCF/yr
G-1C	1,972.0	931.7	1,860.3	492.6	320.9	2,365.2	3,533.2	3,026.1	0.0	0.0	0.0	0.0	MSCF/mo	16,758.89	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>0.0</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,580.2</b>	<b>2,725.5</b>	<b>3,781.4</b>	<b>MSCF/mo</b>	<b>19,54</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>2.1</b>	<b>0.8</b>	<b>Gal/mo</b>	<b>14.55</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	2,268.8	1,910.0	1,836.6	1,600.0	1,988.8	1,540.0	2,386.8	1,863.0	2,176.0	2,447.0	2,627.2	2,677.0	Gal/mo	25,341	N/A	Gal/yr
Work Boat Fuel:	1,145.2	1,871.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	962.5	1,904.0	2,141.1	2,296.8	2,342.4	Gal/mo	21,061	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,414.0</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>5,019.4</b>	<b>Gal/mo</b>	<b>46,403</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.06	0.06	0.06	0.04	0.05	0.07	0.07	0.05	0.07	0.08	0.08	0.08	Tons/mo	0.77	1.90	Tons/yr at 33.15 lbs/MGal
NOX	0.96	1.00	0.97	0.70	0.92	1.19	1.26	0.80	1.14	1.29	1.38	1.41	Tons/mo	13.02	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.06	0.06	0.04	0.06	0.07	0.07	0.05	0.07	0.08	0.08	0.08	Tons/mo	0.78	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	0.02	0.02	0.02	0.02	Tons/mo	0.17	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.17	0.18	0.18	0.13	0.17	0.22	0.23	0.15	0.21	0.23	0.25	0.26	Tons/mo	2.37	5.64	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gall (PTO No 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Dec-19**

Equipment	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	404.0	287.0	259.0	178.0	196.0	143.0	616.4	588.1	349.1	499.1	693.7	623.4	Gal/mo	4,836.8	N/A	Gal/yr
South Crane	107.0	235.0	76.0	49.0	345.0	403.5	410.6	560.0	93.0	179.0	280.1	176.0	Gal/mo	2,890.2	N/A	Gal/yr
<b>Crane Total</b>	<b>511.0</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>953.8</b>	<b>801.4</b>	<b>Gal/mo</b>	<b>7,733</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	252.0	279.0	270.0	279.0	270.0	279.0	279.0	270.0	279.0	270.0	279.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	45.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.05	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>324.0</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.33</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	208.0	0.00	451.0	0.00	0.00	0.00	72.0	0.00	0.00	0.00	0.00	0.00	Gal/mo	731.00	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	22.0	5.0	18.3	0.0	3.0	34.6	5.0	0.0	0.0	0.0	10.0	0.0	Gal/mo	97.90	7,315	Gal/yr
P-19 Firewater Pump	18.0	13.0	0.0	0.0	14.0	11.0	0.0	15.0	0.0	0.0	18.0	0.0	Gal/mo	89.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	0.0	2,479.2	1,816.0	2,846.8	0.0	0.0	0.0	0.0	Gal/mo	7,142.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	1,843.1	259.3	153.1	106.9	45.4	196.9	0.0	240.4	0.0	2,146.1	1,938.2	1,051.5	MSCF/mo	8,012.90	N/A	MMSCF/yr
G-1B	0.0	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	1,843.2	2,801.7	MSCF/mo	15,409.65	N/A	MMSCF/yr
G-1C	931.7	1,860.3	492.6	320.9	2,365.2	2,255.0	3,533.2	3,028.1	0.0	0.0	0.0	0.0	MSCF/mo	14,786.89	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>1,843.1</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,580.2</b>	<b>2,725.5</b>	<b>3,781.4</b>	<b>3,883.2</b>	<b>MSCF/mo</b>	<b>23.42</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 1.64 lbs/gal
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>2.1</b>	<b>0.8</b>	<b>0.8</b>	<b>Gal/mo</b>	<b>15.30</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	1,910.0	1,836.6	1,600.0	1,988.8	1,540.0	2,386.6	1,883.0	2,176.0	2,447.0	2,627.2	2,677.0	2,241.0	Gal/mo	25,313	N/A	Gal/yr
Work Boat Fuel:	1,871.3	1,607.0	910.0	1,295.7	2,695.0	2,088.5	982.5	1,904.0	2,141.1	2,298.6	2,342.4	1,960.9	Gal/mo	21,877	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,581.3</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>5,019.4</b>	<b>4,201.9</b>	<b>Gal/mo</b>	<b>47,191</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.06	0.06	0.04	0.05	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	Tons/mo	0.78	1.90	Tons/yr at 33.15 lbs/MGal
NOX	1.00	0.97	0.70	0.92	1.19	1.26	0.80	1.14	1.29	1.38	1.41	1.18	Tons/mo	13.24	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.06	0.04	0.06	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	Tons/mo	0.79	1.92	Tons/yr at 33.50 lbs/MGal
SOX	0.01	0.01	0.01	0.01	0.02	0.02	0.01	0.02	0.02	0.02	0.02	0.02	Tons/mo	0.18	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.18	0.18	0.13	0.22	0.22	0.23	0.15	0.21	0.23	0.25	0.26	0.21	Tons/mo	2.41	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gal (PTO No. 1494)

**Platform Grace  
PTO No. 1493 Equipment Usage**

**Rolling 12-Months Ending:  
Jan-20**

Equipment	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	287.0	259.0	178.0	196.0	143.0	616.4	588.1	349.1	499.1	683.7	623.4	681.8	Gal/mo	5,114.6	N/A	Gal/yr
South Crane	235.0	76.0	49.0	345.0	403.5	470.8	580.0	93.0	179.0	260.1	178.0	168.8	Gal/mo	2,958.0	N/A	Gal/yr
<b>Crane Total</b>	<b>522.0</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>953.8</b>	<b>801.4</b>	<b>850.6</b>	<b>Gal/mo</b>	<b>8,073</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	252.0	279.0	270.0	279.0	270.0	279.0	279.0	270.0	279.0	270.0	279.0	279.0	MSCF/mo	3.29	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.00	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>252.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.29</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	451.0	0.0	0.0	0.0	72.0	0.0	0.0	0.0	0.0	0.0	0.0	Gal/mo	621.00	55,900	Gal/yr
G3	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	51.10	MMSCF/yr
48 BHP Starter Engine	5.0	18.3	0.0	3.0	34.6	5.0	0.0	0.0	0.0	10.0	0.0	0.0	Gal/mo	78.90	7,315	Gal/yr
P-19 Firewater Pump	13.0	0.0	0.0	14.0	11.0	11.0	15.0	0.0	0.0	18.0	0.0	0.0	Gal/mo	71.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	0.0	2,479.2	1,816.0	2,846.8	0.0	0.0	0.0	0.0	2,456.5	Gal/mo	9,598.50	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	259.3	153.1	106.9	45.4	189.9	0.0	240.4	0.0	2,146.1	1,938.2	1,061.5	2,398.1	MSCF/mo	8,567.85	N/A	MMSCF/yr
G-1B	257.1	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	1,843.2	2,801.7	1,799.5	MSCF/mo	17,209.20	N/A	MMSCF/yr
G-1C	1,860.3	492.6	320.9	2,365.2	2,255.0	3,533.2	3,028.1	0.0	0.0	0.0	0.0	0.0	MSCF/mo	13,855.19	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>516.4</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,580.2</b>	<b>2,725.5</b>	<b>3,781.4</b>	<b>3,883.2</b>	<b>4,197.6</b>	<b>MSCF/mo</b>	<b>25.78</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
Tanks Throughputs																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
Total Coatings	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11.7	2.1	0.8	0.8	0.0	Gal/mo	15.30	Exempt	Gal/yr
<b>Boats:</b>																
Crew Boat Fuel:	1,836.6	1,800.0	1,988.8	1,540.0	2,366.8	1,893.0	2,176.0	2,447.0	2,627.2	2,677.0	2,241.0	2,140.0	Gal/mo	25,543	N/A	Gal/yr
Work Boat Fuel:	1,607.0	910.0	1,295.7	2,895.0	2,085.5	962.5	1,904.0	2,141.1	2,298.8	2,342.4	1,960.9	1,872.5	Gal/mo	22,078	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,443.6</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>5,019.4</b>	<b>4,201.9</b>	<b>4,012.5</b>	<b>Gal/mo</b>	<b>47,622</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.06	0.04	0.05	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	Tons/mo	0.79	1.90	Tons/yr at 33.15 lbs/MMGal
NOX	0.97	0.70	0.92	1.19	1.26	0.80	1.14	1.29	1.38	1.41	1.18	1.13	Tons/mo	13.36	32.11	Tons/yr at 561.00 lbs/MMGal
PM	0.06	0.04	0.06	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	Tons/mo	0.80	1.92	Tons/yr at 33.50 lbs/MMGal
SOX	0.01	0.01	0.01	0.02	0.02	0.01	0.02	0.02	0.02	0.02	0.02	0.02	Tons/mo	0.18	0.42	Tons/yr at 7.50 lbs/MMGal
CO	0.18	0.13	0.17	0.22	0.23	0.16	0.21	0.23	0.25	0.26	0.21	0.20	Tons/mo	2.43	5.64	Tons/yr at 102.00 lbs/MMGal

<sup>a</sup> Without producing wells, crane limit is 13,344 gal/yr; with any producing wells, limit is 7,344 gal/yr

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gal (PTO No. 1494)

**Platform Grace**  
**PTO No. 1493 Equipment Usage**  
**Rolling 12-Months Ending:**  
**Feb-20**

Equipment	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	259.0	178.0	196.0	143.0	616.4	588.1	349.1	499.1	693.7	623.4	681.8	681.8	Gal/mo	5,509.4	N/A	Gal/yr
South Crane	76.0	49.0	345.0	403.5	410.6	560.0	83.0	179.0	280.1	178.0	188.8	188.8	Gal/mo	2,891.8	N/A	Gal/yr
<b>Crane Total</b>	<b>335.0</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>953.8</b>	<b>801.4</b>	<b>850.6</b>	<b>850.6</b>	<b>Gal/mo</b>	<b>8,401</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	279.0	270.0	279.0	270.0	279.0	279.0	270.0	279.0	270.0	279.0	279.0	279.0	MSCF/mo	3.31	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.00	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.31</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	451.0	0.0	0.0	0.0	72.0	0.0	0.0	0.0	0.0	0.0	98.0	98.0	Gal/mo	719.00	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	18.3	0.0	3.0	34.6	5.0	0.0	0.0	10.0	0.0	0.0	0.0	0.0	Gal/mo	70.90	7,315	Gal/yr
P-19 Firewater Pump	0.0	0.0	14.0	11.0	0.0	15.0	0.0	18.0	0.0	0.0	0.0	0.0	Gal/mo	58.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	0.0	2,478.2	1,816.0	2,846.8	0.0	0.0	0.0	0.0	2,456.5	2,456.5	Gal/mo	12,055.00	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	153.1	106.9	45.4	198.9	0.0	240.4	0.0	2,146.1	1,938.2	1,081.5	2,398.1	2,398.1	MSCF/mo	10,706.60	N/A	MMSCF/yr
G-1B	2,207.9	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	1,843.2	2,801.7	1,799.5	1,799.5	MSCF/mo	18,751.65	N/A	MMSCF/yr
G-1C	492.6	320.9	2,365.2	2,255.0	3,533.2	3,028.1	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	11,984.93	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>2,361.0</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,580.2</b>	<b>2,725.5</b>	<b>3,781.4</b>	<b>3,883.2</b>	<b>4,197.6</b>	<b>4,197.6</b>	<b>MSCF/mo</b>	<b>29.46</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
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	Gal/mo	0.00	4,300	Gal/yr
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Bbls/mo	0.000	20	MBbl/yr
V-6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,155.0	Bbls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>2.1</b>	<b>0.8</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>15.30</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
Crew Boat Fuel:	1,600.0	1,988.8	1,540.0	2,386.8	1,863.0	2,176.0	2,447.0	2,627.2	2,677.0	2,241.0	2,140.0	2,140.0	Gal/mo	25,847	N/A	Gal/yr
Work Boat Fuel:	910.0	1,295.7	2,895.0	2,088.5	962.5	1,904.0	2,141.1	2,298.8	2,342.4	1,960.9	1,872.5	1,872.5	Gal/mo	22,344	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>2,510.0</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>5,019.4</b>	<b>4,201.9</b>	<b>4,012.5</b>	<b>4,012.5</b>	<b>Gal/mo</b>	<b>48,191</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.04	0.05	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	0.07	Tons/mo	0.80	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.70	0.92	1.19	1.26	0.80	1.14	1.29	1.38	1.41	1.18	1.13	1.13	Tons/mo	13.52	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.04	0.06	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	0.07	Tons/mo	0.81	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.01	0.02	0.02	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.02	Tons/mo	0.18	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.13	0.17	0.22	0.23	0.15	0.21	0.23	0.25	0.26	0.21	0.20	0.20	Tons/mo	2.46	5.94	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gail (PTO No. 1494)



Platform Grace  
PTO No. 1493 Equipment Usage

Rolling 12-Months Ending:  
Mar-20

Equipment	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Monthly Units	12-Month Total	Permit Limit	12-Mo & Permit Units
<b>Cranes:</b>																
North Crane	178.0	196.0	143.0	616.4	588.1	349.1	499.1	683.7	623.4	681.8	681.8	681.8	Gal/mo	5,932.2	N/A	Gal/yr
South Crane	49.0	345.0	403.5	410.6	560.0	93.0	179.0	260.1	178.0	168.8	168.8	168.8	Gal/mo	2,984.6	N/A	Gal/yr
<b>Crane Total</b>	<b>227.0</b>	<b>541.0</b>	<b>546.5</b>	<b>1,027.0</b>	<b>1,148.1</b>	<b>442.1</b>	<b>678.1</b>	<b>943.8</b>	<b>801.4</b>	<b>850.6</b>	<b>850.6</b>	<b>850.6</b>	<b>Gal/mo</b>	<b>8,917</b>	<b>13,344</b>	<b>Gal/yr<sup>a</sup></b>
<b>Flare Gas Consumption:</b>																
Planned (HP+LP)	270.0	279.0	270.0	279.0	279.0	270.0	279.0	270.0	279.0	279.0	279.0	279.0	MSCF/mo	3.31	N/A	MMSCF/yr
Unplanned (HP+LP)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	0.00	N/A	MMSCF/yr
Pilot Purge (HP+LP)																
<b>Flare Gas Total</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>270.0</b>	<b>279.0</b>	<b>279.0</b>	<b>279.0</b>	<b>279.0</b>	<b>MSCF/mo</b>	<b>3.31</b>	<b>7.19</b>	<b>MMSCF/yr<sup>b</sup></b>
<b>Generators:</b>																
G2 (Emergency)	0.0	0.0	0.0	72.0	0.0	0.0	0.0	0.0	0.00	98.0	98.0	98.0	Gal/mo	366.00	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	3.0	34.6	5.0	0.0	0.0	0.0	10.0	0.0	0.0	0.0	0.0	Gal/mo	52.60	7,315	Gal/yr
P-19 Firewater Pump	0.0	14.0	11.0	0.0	15.0	0.0	0.0	18.0	0.0	0.0	0.0	0.0	Gal/mo	58.00	Exempt	Gal/yr
Portable Equipment	0.0	0.0	2,479.2	1,816.0	2,846.8	0.0	0.0	0.0	0.0	2,456.5	2,456.5	2,456.5	Gal/mo	14,511.50	Exempt	Gal/yr
<b>Production Engines</b>																
G-1A	106.9	45.4	198.9	0.0	240.4	0.0	2,146.1	1,938.2	1,081.5	2,398.1	2,398.1	2,398.1	MSCF/mo	12,951.55	N/A	MMSCF/yr
G-1B	1,062.3	86.3	1,037.3	1,417.3	537.0	3,580.2	579.4	1,843.2	2,801.7	1,799.5	1,799.5	1,799.5	MSCF/mo	18,343.30	N/A	MMSCF/yr
G-1C	320.9	2,365.2	2,255.0	3,533.2	3,028.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	MSCF/mo	11,502.33	N/A	MMSCF/yr
<b>Production ICE Total</b>	<b>1,169.2</b>	<b>131.7</b>	<b>1,236.2</b>	<b>1,417.3</b>	<b>777.4</b>	<b>3,580.2</b>	<b>2,725.5</b>	<b>3,781.4</b>	<b>3,883.2</b>	<b>4,197.6</b>	<b>4,197.6</b>	<b>4,197.6</b>	<b>MSCF/mo</b>	<b>31.29</b>	<b>60.00</b>	<b>MMSCF/yr</b>
<b>Drilling Engines</b>																
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
<b>Drilling ICE Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>MMSCF/mo</b>	<b>0.00</b>	<b>126.72</b>	<b>MMSCF/yr</b>
<b>Diesel Backup Generator</b>																
<b>Tanks Throughputs</b>																
T-3A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Ebls/mo	0.000	20	MBbl/yr
T-3B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Ebls/mo	0.000	20	MBbl/yr
V-8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3,005.0	3,005.0	3,155.0	Ebls/mo	6,160	3960	MBbl/yr
<b>Solvent Usage</b>																
Z-Sol	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 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
<b>Total Solvents</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>0.00</b>	<b>4.45</b>	<b>Tons/yr ROC</b>
<b>Total Coatings</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.7</b>	<b>2.1</b>	<b>0.8</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>Gal/mo</b>	<b>15.30</b>	<b>Exempt</b>	<b>Gal/yr</b>
<b>Boats:</b>																
<b>Crew Boat Fuel:</b>	1,988.8	1,540.0	2,386.8	1,883.0	2,176.0	2,447.0	2,627.2	2,677.0	2,241.0	2,140.0	2,140.0	2,140.0	Gal/mo	26,387	N/A	Gal/yr
<b>Work Boat Fuel:</b>	1,295.7	2,695.0	2,088.5	962.5	1,904.0	2,141.1	2,298.8	2,342.4	1,960.9	1,872.5	1,872.5	1,872.5	Gal/mo	23,306	N/A	Gal/yr
<b>Total Boat Fuel:</b>	<b>3,284.5</b>	<b>4,235.0</b>	<b>4,475.3</b>	<b>2,845.5</b>	<b>4,080.0</b>	<b>4,588.1</b>	<b>4,926.0</b>	<b>5,019.4</b>	<b>4,201.9</b>	<b>4,012.5</b>	<b>4,012.5</b>	<b>4,012.5</b>	<b>Gal/mo</b>	<b>49,693</b>	<b>96,792</b>	<b>Gal/yr<sup>c</sup></b>
<b>Boat Emissions: tons</b>																
ROC	0.05	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	0.07	0.07	Tons/mo	0.82	1.90	Tons/yr at 33.15 lbs/MGal
NOx	0.92	1.19	1.26	0.80	1.14	1.29	1.38	1.41	1.18	1.13	1.13	1.13	Tons/mo	13.94	32.11	Tons/yr at 561.00 lbs/MGal
PM	0.06	0.07	0.07	0.05	0.07	0.08	0.08	0.08	0.07	0.07	0.07	0.07	Tons/mo	0.83	1.92	Tons/yr at 33.50 lbs/MGal
SOx	0.01	0.02	0.02	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	Tons/mo	0.19	0.42	Tons/yr at 7.50 lbs/MGal
CO	0.17	0.22	0.23	0.15	0.21	0.23	0.25	0.26	0.21	0.20	0.20	0.20	Tons/mo	2.53	5.84	Tons/yr at 102.00 lbs/MGal

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

<sup>b</sup> Permit Limit for is 7.05 MMSCF/yr for HP and 0.14 MMSCF/yr for LP

<sup>c</sup> Boat fuel usage is tracked at Platform Gal (PTO No. 1494)

## **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  
 G399 CATERPILLAR GENERATOR ENGINE (G-1A)  
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: JUN

Year: 2019

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			Tester's Initials
Initial Reading (ppmv @ 15%O2)		Time		Secondary Reading (ppmv @ 15% O2) (if needed)	Time	Nox	
Day	Nox		CO				Nox
1							
2							
3							
4							
5	2	0	23:45				JR
6	2	2	0:05				RS
7	2	0	0:23				RS
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							



Condition PQ11493PC5

PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1A)  
DAILY CAM/RULE 74.9 MONITORING

G-1A Month: Aug Year: 2019

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15%O2)			Corrective Actions Taken (In the event that initial test result is NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	Nox	CO	Time		Nox	CO	
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							









Condition PQ11493PC5

PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1A)  
DAILY CAM/RULE 74.9 MONITORING

G-1A Month: Dec Year: 2019

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Time	
Day	Nox				CO	Nox		CO
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13	3.5	6	12:00					DE
14								
15	3.6	29	13:18					DE
16	2	71	14:28					TD
17	1.3	9	10:26					STC/DR
18	0.2	59	00:15					RS
19	0.1	22	00:14					DA
20	0.1	22	00:09					RS
21	1.7	4	00:10					RS
22	0.2	19	00:15					RS
23								
24								
25								
26								
27								
28								
29								
30								
31	3.4	7	14:02					RS



Condition PQ11493PC5

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

Feb. 2020  
 G-1A

FEB. 2020

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS  (In the event that initial test result is NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)	SECONDARY NOX/CO TEST			Tester's Initials
Initial Reading (ppmv @ 15%O2)		Time		Secondary Reading (ppmv @ 15% O2) (if needed)	Time		
Day	Nox	CO		Nox	CO		
1							
2							
3							
4							
5							
6							
7							
8							
9	0.6	12	18:05				JR
10	1.4	4	00:11				GE
11	1.2	5	00:17				GE
12	0.1	26	16:24				SR
13	0.1	10	01:46				RS
14	3.1	7	00:54				RS
15	0.1	13	01:05				RS
16	0.1	50	10:02				JR
17	1.3	18	00:00				RS
18	0.2	30	00:02				RS
19	3.8	25	19:38				GE
20	4.1	17	00:53				GE
21	0.1	12	22:17				GE
22	4.4	25	00:39				GE
23	3	4	00:06				GE
24	0.4	13	00:10				GE
25	0.1	10	00:31				RS
26	1	1	00:03				RS
27							
28							
29							
30							
31							



## **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: Aug Year: 2019

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 and / or CO is greater than 71 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1	2	17	18:36					RS
2	4	51	15:07					JR
3	3	19	0:14					RS
4	1	50	0:34					RS
5	3	14	21:23					RS
6	4	11	12:17					RS
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28	3	33	5:31					RS
29	2	46	0:12					JR
30	2	44	0:10					RS
31	1	10	0:05					RS



Condition PQ11493PC5

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

G-1B Month: Oct Year: 2019

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS  (In the event that initial test result is greater than 5 ppmv @ 15% O2 and / or CO is greater than 71 ppmv @ 15% O2)	SECONDARY NOX/CO TEST			
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken		Secondary Reading (ppmv @ 15% O2) (if needed)		Time	Tester's Initials
Day	Nox			CO	Nox	CO		
1	2	49	00:06				RS	
2	1	59	01:30				GE	
3	2	51	01:52				SM	
4	1	62	00:00				GE	
5	1	54	00:49				GE	
6	1	62	00:42				GE	
7	1	56	01:21				GE	
8	2	62	00:11				GE	
9	1	45	08:09				STC	
10	1	58	00:09				RS	
11	0	54	10:01				RS	
12								
13								
14								
15	2	58	09:16				AW	
16	1	57	00:32				GE	
17	2	9	00:13				SM	
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

Condition PQ11493PC5

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

G-1B Month: Nov Year: 2019

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 and / or CO is greater than 71 ppmv @ 15% O2)			Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials	
Nox	CO					Nox	CO		Time
Day	Nox	CO			Nox	CO	Time	Tester's Initials	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13	-	130	20:21	Hrs run in w/ no catalyst**					JR
14	-	-	00:23	Hrs run in w/ no catalyst**					JR
15	-	231	08:00	Hrs run in w/ no catalyst**					JR
16	-	-	00:00	Hrs run in w/ no catalyst**					JR
17	-	407	00:59	Hrs run in w/ no catalyst**					DE
18	-	-	01:04	Hrs run in w/ no catalyst**					DE
19	-	-	00:16	Hrs run in w/ no catalyst**					DE
20									
21	0	50	13:30					STC	
22	1	68	00:04					RS	
23	5	33	14:30					STC	
24	2	49	00:37					RS	
25	3	19	20:00					RS	
26	5	9	03:19					RS	
27	4	56	12:12					AW	
28	3	65	11:00					TD	
29	4	18	09:50					TD	
30	4	53	08:15					DE	
31									

\*\*per 11/13/19 e-mail from John Garnett to Keith Macias

## John Garnett

---

**From:** John Garnett  
**Sent:** Wednesday, November 13, 2019 5:37 PM  
**To:** keith@vcapcd.org  
**Cc:** Scott Bing; Doug Hatano  
**Subject:** Beacon West Platform Grace engine

Hi Keith,

Beacon West Energy Group (permit holder for Platform Grace) has just completed an engine overhaul for one of its natural gas generators on Grace (engine G-1B). This is one of three identical generators which alternately provide all power to Platform Grace, which is currently undergoing well plug and abandonment. The re-built engine needs a 100 break in period before it is expected to pass P/O 1493 emissions limits (5 ppm NOx, 71 ppm CO) during required daily testing. Per below e-mails, this activity was previously allowed by Dan Searcy for an identical engine on Grace.

G-1B went into operation today and will continue to operate for the coming days and possibly weeks, all daily testing will occur and be reported, and we expect that the engine will settle in and meet limits well within a continuous 100 hour run period. If readings continue to exceed limits beyond 100 hours, it will be shut down for troubleshooting prior to restart/retest.

Beacon West requests the allowance for this excursion to occur consistent with the prior arrangement with the District. We are happy to report progress at the end of the 100 hour period. We appreciate your consideration, please let me know if you have any questions.

### John Garnett

EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

**From:** Dan Searcy <dans@vcapcd.org>  
**Sent:** Friday, September 7, 2018 3:37 PM  
**To:** John Garnett <john.garnett@beacon-west.com>  
**Subject:** RE: Grace engine per our discussion

You said if the readings were still high on Monday, you would shut it down until they can come out to tune. That's a good plan. Let's stick to that.

Regards, Dan Searcy  
Manager, Compliance Division  
Ventura County APCD  
669 County Square Drive, 2<sup>nd</sup> Floor



Ventura, CA 93003  
805/645-1494 Office  
805/645-1444 Fax

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Friday, September 7, 2018 3:31 PM  
**To:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Subject:** RE: Grace engine per our discussion

Dan,

I believe Quinn is booked up until then. The engine can't be tuned until it is broken in, so ideally they would be out there Monday to do their part but you know how scheduling vendors can be.

I will update you Monday, thanks.

**John Garnett**

EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

**From:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Sent:** Friday, September 7, 2018 3:24 PM  
**To:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Subject:** RE: Grace engine per our discussion

Please email me Monday with a progress report. One question. Why is Quinn not coming out sooner than 9-27?

Regards, Dan Searcy  
Manager, Compliance Division  
Ventura County APCD  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003  
805/645-1494 Office  
805/645-1444 Fax

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Friday, September 7, 2018 2:28 PM  
**To:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Subject:** Grace engine per our discussion

Dan,

The new engine we discussed on the phone (replacement engine for Grace G-1C) started operating under load last night will be fully broken in by Monday (100 hour break in required). Daily CAM readings will be conducted, and if readings are still high on Monday the unit will be shut down until Quinn is able to come out to tune it into compliance – their visit

is scheduled for 9/27. If this is acceptable to you, any excursions will be noted in the next compliance report, and attributed to new engine break in. Source test will be conducted within 60 days.

**John Garnett**

EHSR Advisor

Beacon West Energy Group, LLC

1145 Eugenia Place #101

Carpinteria, CA 93003

(805) 395-9676 - office

(805) 765-5450 - mobile

Condition PQ11493PC5

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

G-1B Month: Dec Year: 2019

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			Tester's Initials
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2 and / or CO is greater than 71 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		
	Nox	CO				CO	Time	
1	5	27	00:37					DE
2	4	57	18:40					DE
3	4	45	01:30					DE
4	4	40	18:10					RS
5	3	51	00:16					RS
6	5	22	18:40					RS
7	4	13	00:07					RS
8	1.6	28	00:13					RS
9	1.8	22	01:09					STC
10	3.6	9	00:01					RS
11	1.7	15	01:22					GE
12	4.9	18	03:54					GE
13	0.4	19	01:30					GE
14	3.1	11	00:01					JR
15	4.2	13	00:05					JR
16	5	18	14:33					TD
17	2.7	12	13:23					STC
18								
19								
20	1.2	10	00:11					RS
21								
22	4	16	09:16					STC
23	4.6	31	00:13					RS
24	4.4	24	00:10					RS
25	2	27	02:45					DE
26	4.3	17	14:31					SM
27	0	17	00:25					DE
28	4.4	16	00:04					DE
29	0.1	44	02:15					JR
30	3.5	20	00:48					DE
31	2.7	7	11:28					RS

Condition PQ11493PC5

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

G-1B

Month: Jan

Year: 2020

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	3.9	4	00:37					RS
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14	0.3	20	20:53					JR
15	0	29	00:54					JR
16	0.3	2	00:04					RS
17	0.1	8	00:13					JR
18	0.1	57	00:05					JR
19	0.1	2	00:02					RS
20	0.9	6	00:53					JR
21	2.2	56	00:42					RS
22	0.1	25	00:03					GE
23	0.3	61	00:19					GE
24	0	53	00:08					GE
25	2.7	6	00:04					GE
26	0.5	9	00:03					GE
27								
28								
29								
30	0.1	36	17:26					GE
31	0.5	4	00:01					GE





## **ENGINE DATA FOR THE CATERPILLAR (G-1C)**

**Engine Manufacturer:** Caterpillar

**Model No.:** G-399 SI-TA HCR

**Serial No.:** 49CO1029

**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. **Biennial source testing for G-1C will be conducted on 5/27/2020.**





Condition PQ11493PC5

**PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1C)  
DAILY CAM/RULE 74.9 MONITORING**

G-1C

Month: MAY

Year: 2019

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		
Day	Nox				CO	Nox	CO
1	3	11	11:22				TMC
2	2	38	9:51				SM
3	3	22	0:17				DE
4	2	56	0:54				DE
5	3	29	0:45				DE
6	3	59	0:15				DE
7	2	6	0:20				DE
8	2	60	0:00				RS
9	2	50	0:33				RS
10	2	48	0:11				RS
11	2	65	0:08				RS
12	2	33	0:03				RS
13	2	38	0:06				RS
14	3	32	0:06				RS
15	3	44	0:36				DE
16	3	44	12:20				JR
17	3	50	0:10				DE
18	3	67	0:25				DE
19	4	18	0:30				JR
20	2	31	0:30				JR
21	2	51	0:30				JR
22	0	64	0:12				DE
23	3	61	0:09				RS
24	3	35	0:07				RS
25	3	44	0:11				RS
26	3	51	0:09				RS
27	3	13	0:21				RS
28	3	53	0:29				RS
29	2	15	0:27				JR
30	3	56	0:20				JR
31	3	43	1:52				DE

Condition PQ11493PC5

**PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1A)  
DAILY CAM/RULE 74.9 MONITORING**

G-1C

Month: June

Year: 2019

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71 ppmv a@15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		
Day	Nox		CO	Nox	CO	Time	
1	3	42	0:47				JR
2	3	45	0:45				JR
3	3	44	1:38				JR
4	3	44	0:31				JR
5	2	37	0:05				RS
6	4	1	0:11				RS
7	3	24	0:21				RS
8	3	46	4:30				RS
9	3	2	0:05				RS
10	4	46	0:06				RS
11	5	28	4:12				JR
12	4	48	9:55				AW
13	1	29	0:15				JR
14	3	14	0:25				DE
15	4	45	0:30				JR
16	4	16	0:30				JR
17	4	19	0:33				JR
18	4	23	0:05				JR
19	5	46	0:13				JR
20	5	22	0:17				JR
21	3	51	0:06				RS
22	4	3	0:01				RS
23	5	6	0:05				JR
24	3	7	0:14				JR
25	4	22	0:00				RS
26	3	9	0:41				DE
27	4	2	0:36				DE
28	3	29	0:09				DE
29	3	5	0:16				DE
30	5	30	0:50				DE
31							



Condition PQ11493PC5

PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1C)  
DAILY CAM/RULE 74.9 MONITORING

G-1C

Month: AUG

Year: 2019

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		
Day	Nox				CO	Nox	CO
1	5	28	0:32				RS
2	5	29	0:14				RS
3	4	19	0:12				RS
4	4	14	0:33				RS
5	5	17	0:22				RS
6	5	13	12:16				RS
7	5	21	12:20				JR
8	4	40	12:22				JR
9	3	31	12:12				JR
10	4	36	12:15				DE
11	4	46	0:21				JR
12	3	48	2:40				DE
13	4	28	0:07				JR
14	5	34	0:06				RS
15	5	33	0:04				JR
16	4	28	0:34				RS
17	4	34	0:10				JR
18	5	37	0:50				JR
19	5	49	0:12				RS
20	4	41	0:12				RS
21	4	25	0:08				JR
22	5	42	4:10				JR
23	5	40	5:57				SM
24	5	31	1:15				JR
25	5	36	5:55				JR
26	5	37	0:10				JR
27	5	34	0:12				JR
28	5	14	0:00				RS
29							
30							
31							

Condition PQ11493PC5

PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1C)  
DAILY CAM/RULE 74.9 MONITORING

G-1C

Month: Sep

Year: 2019

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			Tester's Initials
Initial Reading (ppmv @ 15%O2)		Time		Secondary Reading (ppmv @ 15% O2) (if needed)	Time		
Day	Nox	CO	(In the event that initial test result is NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)	Nox	CO	Time	
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
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17							
18							
19							
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21							
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25							
26							
27							
28							
29							
30							
31							

Condition PQ11493PC5

PLATFORM GRACE  
G399 CATERPILLAR GENERATOR ENGINE (G-1C)  
DAILY CAM/RULE 74.9 MONITORING

G-1C

Month: Oct

Year: 2019

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS  (In the event that initial test result is NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)	SECONDARY NOX/CO TEST			Tester's Initials
Initial Reading (ppmv @ 15%O2)		Time		Nox	Secondary Reading (ppmv @ 15% O2) (if needed)	Time	
Day	Nox		CO				
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							







Condition PQ11493PC5

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

G-1C

Month: Jan

Year: 2020

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)	Secondary Reading (ppmv @ 15% O2) (if needed)		Time	
Day	Nox			CO	Nox		CO
1			NO RUN FOR THIS MONTH				
2			-REBUILDING-				
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							

Condition PQ11493PC5

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

Feb. 2020  
 G-1C

FEB. 2020

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 NOX greater than 5 ppmv @ 15% O2 and/or CO is greater than 71ppmv a@15% O2)	Secondary Reading (ppmv @ 15% O2) (if needed)		Time	
Day	Nox			CO	Nox		CO
1							
2							
3							
4							
5							
6	N/A	N/A	Catalyst removed for break in run - No NoX readings taken				JR
7			Catalyst removal authorized by VCAPCD				
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							

## John Garnett

---

**From:** John Garnett  
**Sent:** Wednesday, February 5, 2020 2:21 PM  
**To:** Scott Bing  
**Cc:** Austin Wright; Tim Davis; Doug Hatano  
**Subject:** RE: Beacon West Platform Grace engine

Thanks for the update Scott. Please let me know when the break in period ends and you start getting good results before the 2/11 source test.

John

**From:** Scott Bing <[scott.bing@beacon-west.com](mailto:scott.bing@beacon-west.com)>  
**Sent:** Wednesday, February 5, 2020 1:14 PM  
**To:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Cc:** Austin Wright <[austin.wright@beacon-west.com](mailto:austin.wright@beacon-west.com)>; Tim Davis <[tim.davis@beacon-west.com](mailto:tim.davis@beacon-west.com)>  
**Subject:** RE: Beacon West Platform Grace engine

John,

We started the 100 hour break in period Monday and had it on and off a few times. As of right now 02/05/2020 1300 we have 36 hours on G-1C.

Scott

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Thursday, January 9, 2020 5:44 PM  
**To:** Ed Swede <[ed@vcapcd.org](mailto:ed@vcapcd.org)>; Keith Macias <[keith@vcapcd.org](mailto:keith@vcapcd.org)>  
**Cc:** Greg Soyster <[greg@vcapcd.org](mailto:greg@vcapcd.org)>; Scott Bing <[scott.bing@beacon-west.com](mailto:scott.bing@beacon-west.com)>; Austin Wright <[austin.wright@beacon-west.com](mailto:austin.wright@beacon-west.com)>; David Ramos <[david.ramos@beacon-west.com](mailto:david.ramos@beacon-west.com)>; Doug Hatano <[doug.hatano@beacon-west.com](mailto:doug.hatano@beacon-west.com)>  
**Subject:** RE: Beacon West Platform Grace engine

Will do Ed, thanks.

### John Garnett

EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

**From:** Ed Swede <[ed@vcapcd.org](mailto:ed@vcapcd.org)>  
**Sent:** Thursday, January 9, 2020 5:41 PM  
**To:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>; Keith Macias <[keith@vcapcd.org](mailto:keith@vcapcd.org)>  
**Cc:** Greg Soyster <[greg@vcapcd.org](mailto:greg@vcapcd.org)>; Scott Bing <[scott.bing@beacon-west.com](mailto:scott.bing@beacon-west.com)>; Austin Wright <[austin.wright@beacon-west.com](mailto:austin.wright@beacon-west.com)>; David Ramos <[david.ramos@beacon-west.com](mailto:david.ramos@beacon-west.com)>; Doug Hatano <[doug.hatano@beacon-west.com](mailto:doug.hatano@beacon-west.com)>  
**Subject:** RE: Beacon West Platform Grace engine

John,

Please move forward with the 100 hour engine break in period for engine G-1C on Platform Grace. At the end of the 100 hour break in period please report the progress to me.

Thank you,

Ed Swede  
Air Quality Engineer II, Compliance Division  
VCAPCD  
[ed@vcapcd.org](mailto:ed@vcapcd.org)  
(805) 645-1413

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Thursday, January 9, 2020 10:39 AM  
**To:** Keith Macias <[keith@vcapcd.org](mailto:keith@vcapcd.org)>  
**Cc:** Greg Soyster <[greg@vcapcd.org](mailto:greg@vcapcd.org)>; Ed Swede <[ed@vcapcd.org](mailto:ed@vcapcd.org)>; Scott Bing <[scott.bing@beacon-west.com](mailto:scott.bing@beacon-west.com)>; Austin Wright <[austin.wright@beacon-west.com](mailto:austin.wright@beacon-west.com)>; David Ramos <[david.ramos@beacon-west.com](mailto:david.ramos@beacon-west.com)>; Doug Hatano <[doug.hatano@beacon-west.com](mailto:doug.hatano@beacon-west.com)>  
**Subject:** FW: Beacon West Platform Grace engine

Hi Keith,

Beacon West Energy Group (permit holder for Platform Grace) has just completed another engine overhaul for one of its natural gas generators on Grace (engine G-1C). This is one of three identical generators which alternately provide all power to Platform Grace, which is currently undergoing well plug and abandonment. The re-built engine needs a 100 break in period before it is expected to pass P/O 1493 emissions limits (5 ppm NOx, 71 ppm CO) during required daily testing. Per below e-mails, this activity was previously allowed by Dan Searcy for an identical engine on Grace.

G-1C is expected to go into operation no later than early next week, will continue to operate for the ensuing days and possibly weeks, all daily testing will occur and be reported, and we expect that the engine will settle in and meet limits well within a continuous 100 hour run period. If readings continue to exceed limits beyond 100 hours, it will be shut down for troubleshooting prior to restart/retest.

FYI, Generators G-1A, G-1B and G-1C will be source tested (as required by the District biennially) on February 11, 2020 to ensure compliance with permitted limits.

Beacon West requests the allowance for this excursion to occur consistent with the prior arrangement with the District. We are happy to report progress at the end of the 100 hour period. We appreciate your consideration, please let me know if you have any questions.

**John Garnett**

EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

**From:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Sent:** Friday, September 7, 2018 3:37 PM  
**To:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Subject:** RE: Grace engine per our discussion

You said if the readings were still high on Monday, you would shut it down until they can come out to tune. That's a good plan. Let's stick to that.

Regards, Dan Searcy  
Manager, Compliance Division  
Ventura County APCD  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003  
805/645-1494 Office  
805/645-1444 Fax

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Friday, September 7, 2018 3:31 PM  
**To:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Subject:** RE: Grace engine per our discussion

Dan,

I believe Quinn is booked up until then. The engine can't be tuned until it is broken in, so ideally they would be out there Monday to do their part but you know how scheduling vendors can be.

I will update you Monday, thanks.

**John Garnett**

EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

**From:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Sent:** Friday, September 7, 2018 3:24 PM  
**To:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Subject:** RE: Grace engine per our discussion

Please email me Monday with a progress report. One question. Why is Quinn not coming out sooner than 9-27?

Regards, Dan Searcy  
Manager, Compliance Division  
Ventura County APCD  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003  
805/645-1494 Office  
805/645-1444 Fax

**From:** John Garnett <[john.garnett@beacon-west.com](mailto:john.garnett@beacon-west.com)>  
**Sent:** Friday, September 7, 2018 2:28 PM  
**To:** Dan Searcy <[dans@vcapcd.org](mailto:dans@vcapcd.org)>  
**Subject:** Grace engine per our discussion

Dan,

The new engine we discussed on the phone (replacement engine for Grace G-1C) started operating under load last night will be fully broken in by Monday (100 hour break in required). Daily CAM readings will be conducted, and if readings are still high on Monday the unit will be shut down until Quinn is able to come out to tune it into compliance – their visit is scheduled for 9/27. If this is acceptable to you, any excursions will be noted in the next compliance report, and attributed to new engine break in. Source test will be conducted within 60 days.

**John Garnett**  
EHSR Advisor  
Beacon West Energy Group, LLC  
1145 Eugenia Place #101  
Carpinteria, CA 93003  
(805) 395-9676 - office  
(805) 765-5450 - mobile

Condition PQ11493PC5

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

G-1C

Month: MARCH

Year: 2020

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								
8								
9	0	52	16:45					RI
10	0.1	3	00:01					GE
11	0.1	68	18:46					RS
12	0	18	00:45					SR
13	0	18	00:52					SR
14	0.1	56	00:42					SR
15	0.3	12	01:10					RS
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29	1.7	13	00:38				RS	RS
30	0.1	12	00:03					RS
31	0.1	7	00:09					RS

## **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

**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

**40 CFR PART 63 SUBPART ZZZZ  
MAINTENANCE PLAN**

**PLATFORM GRACE  
G-1A ENGINE SERVICE  
CATERPILLAR MODEL G-399, 915 HP**

DATE 2/26/2020

HOURS: 44397

MECHANIC: JUSTIN ROBARGE

**ANNUAL SERVICE (OR 500 HOURS)<sup>A</sup>**

**INSPECT/CHANGE HOSES AND BELTS: INSPECTED**

**COMMENTS: INSPECTED**

**CHANGE OIL & FUEL FILTERS: CHANGED**

**COMMENTS:**

**CHANGE CRANK CASE OIL: CHANGED**

**COMMENTS:**

**REPLACE AIR FILTERS: INSPECTED**

**COMMENTS: 1500 HOUR SERVICE**

**2000 HOUR SERVICE<sup>B</sup>**

**INSPECT/CLEAN/CALIBRATE SPEED/TIMING SENSORS:**

**COMMENTS: INSPECTED**

**INSPECT/ADJUST VALVE LASH:**

**COMMENTS: ADJUSTED ACCORDINGLY TO SERVICE MANUAL**

**INSPECT/REPLACE VALVE ROTATORS:**

**COMMENTS:**

**ADDITIONAL MAINTENANCE**

SIGNATURE *Justin Robarge*

(A) IF 500 OPERATING HOURS ATTAINED PRIOR TO 12 MONTHS SINCE LAST SERVICE, PERFORM SERVICE AT 500 HOURS

(B) CLEAN, CALIBRATE, ADJUST, REPLACE AS NECESSARY.



**40 CFR PART 63 SUBPART ZZZZ  
MAINTENANCE PLAN**

**PLATFORM GRACE  
BACK-UP AIR COMPRESSOR ENGINE SERVICE  
C-5B JOHN DEER, 48 HP**

**DATE** 30-AUG-19

**HOURS:** 466.3

**MECHANIC:** JUSTIN ROBARGE/RAY SOLIZ

**ANNUAL SERVICE (OR 250 HOURS)<sup>A</sup>**

**INSPECT/CHANGE HOSES AND BELTS:**

**COMMENTS:** LOOK GOOD

**CHANGE OIL & FUEL FILTERS:**

**COMMENTS:** CHANGED

**CHANGE CRANK CASE OIL:**

**COMMENTS:** CHANGED

**REPLACE AIR FILTERS:**

**COMMENTS:** CHANGED

**2000 HOUR SERVICE<sup>B</sup>**

**INSPECT/CLEAN/CALIBRATE SPEED/TIMING SENSORS:**

**COMMENTS:** \_\_\_\_\_

**INSPECT/ADJUST VALVE LASH:**

**COMMENTS:** \_\_\_\_\_

**INSPECT/REPLACE VALVE ROTATORS:**

**COMMENTS:** \_\_\_\_\_

**ADDITIONAL MAINTENANCE**

SIGNATURE

*Justin Robarge*

(A) IF 250 OPERATING HOURS ATTAINED PRIOR TO 12 MONTHS SINCE LAST SERVICE, PERFORM SERVICE AT 250 HOURS

(B) CLEAN, CALIBRATE, ADJUST, REPLACE AS NECESSARY.


















www.quantumairlab.com

1210 E. 223rd Street, Suite #314 • Carson, California 90745 • 310/830-2226 • Fax 310/830-2227

**CLIENT:** Oilfield Environmental & Compliance, Inc.  
**LABORATORY NO:** 20-249  
**SAMPLING DATE:** 03/17/20  
**RECEIVING DATE:** 03/18/20  
**ANALYSIS DATE:** 03/18/20  
**REPORT DATE:** 03/19/20

**Laboratory Analysis Report**

<b>Analysis Method</b>	<b>SCAQMD 307-91</b>		
<b>Detection Limits</b>	<b>0.05PPMV</b>		
Analyte	<b>Client ID</b>	<b>2001448-01</b>	<b>2001448-02</b>
	<b>Sampling Date</b>	<b>03/17/20</b>	<b>03/17/20</b>
	<b>Sampling Time</b>	<b>1030</b>	<b>1035</b>
	<b>Lab ID</b>	<b>07820-2</b>	<b>07820-3</b>
	<b>Units</b>	<b>PPMV</b>	<b>PPMV</b>
<b>Hydrogen Sulfide</b>	<0.05	<0.05	<0.05
<b>Carbonyl Sulfide</b>	<0.05	<0.05	<0.05
<b>Methyl Mercaptan</b>	<0.05	<0.05	<0.05
<b>Ethyl Mercaptan</b>	<0.05	<0.05	<0.05
<b>Un-Identified S Compounds</b>	0.52	0.58	0.58
<b>Total Sulfur as H<sub>2</sub>S</b>	<b>0.52</b>	<b>0.58</b>	<b>0.58</b>

  
 Dr. Andrew Kitto  
 President



www.quantumairlab.com

1210 E. 223rd Street, Suite #314 • Carson, California 90745 • 310/830-2226 • Fax 310/830-2227

**CLIENT:** Oilfield Environmental & Compliance, Inc.  
**LABORATORY NO:** 20-249  
**SAMPLING DATE:** 03/17/20  
**RECEIVING DATE:** 03/18/20  
**ANALYSIS DATE:** 03/18/20  
**REPORT DATE:** 03/19/20

**Quality Assurance Report**

**Duplicate Analysis**

Sample ID: 2001448-02

Lab ID: 07820-3

<b>Analysis Method</b>		<b>SCAQMD 307-91</b>		
<b>Detection Limit</b>		<b>0.05 PPMV</b>		
	<b>Aver. Conc.</b>	<b>Dil. Factor</b>	<b>DF*A/CF</b>	<b>% Sample</b>
<b>Analyte</b>	<b>PPMV</b>	<b>Ambient Air</b>	<b>PPMV</b>	<b>Recovery</b>
Hydrogen Sulfide	<0.05	1	<0.05	N/A
Carbonyl Sulfide	<0.05	1	<0.05	N/A
Methyl Mercaptan	<0.05	1	<0.05	N/A
Ethyl Mercaptan	<0.05	1	<0.05	N/A
Unidentified S Compounds	0.56	1	0.53	95.5
<b>Total Sulfur as H2S</b>	<b>0.56</b>	<b>1</b>	<b>0.53</b>	<b>95.5</b>

N/A: Not Applicable



Dr. Andrew Kitto  
President



# Oilfield Environmental & Compliance, Inc.

Beacon West - Carpinteria  
 5675 Carpinteria Ave.  
 Carpinteria CA, 93013

Project: Annual SCAQMD Samples  
 Project Number: Annual Platform Grace T-13 Produced Water & Fuel G  
 Project Manager: John Garnett

WO & Reported:  
**2001448**  
 03/27/2020 13:30

## ANALYTICAL REPORT FOR SAMPLES 2001448-03 (Produced Water) T-13 Produced Water

Analyte	Result	RL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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### ROC Volatile by GC/MS

									PH
ROC (C3-C10)	ND	50	ug/L	1	B0C0680	03/25/20	03/25/20	EPA 8260B Mod.	<b>TPH-Samp</b>
<i>Surrogate: Dibromofluoromethane</i>		94 %	( 87 - 121 )		"	"	"	"	
<i>Surrogate: Toluene-d8</i>		100 %	( 76 - 120 )		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		107 %	( 76 - 131 )		"	"	"	"	

*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.*



## Letter of Conformance

April 14, 2020

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to Beacon West Energy Group, LLC Platform Gail & Grace from 1/1/2019-12/31/2019.

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 SC Fuels. 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.

*Terri Merritt*

Account Manager  
SC Fuels  
Oxnard Division  
Office (805)299-1217  
merrittt@scfuels.com





## Letter of Conformance

April 14, 2020

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to Beacon West Energy Group, LLC Platform Gail & Grace from 1/1/2020-4/14/2020.

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 SC Fuels. 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.

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