

EXHIBIT #8

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**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In The Matter Of)	Case No. 5855-7
)	
BETA OFFSHORE OPERATING, LLC)	DECLARATION OF JEFF ORTLOFF IN SUPPORT OF STATUS REPORT AND/OR MODIFICATION HEARING FOR A REGULAR VARIANCE
[Facility ID No. 166073],)	
Petitioner,)	
vs.)	
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT,)	<u>Date:</u> April 23, 2024
Respondent.)	<u>Time:</u> 9:30 A.M.

DECLARATION OF JEFF ORTLOFF

A. I am the Director of Facilities Engineering for Amplify Energy Corp., Beta Offshore’s parent company. In this position, I am responsible for the engineering and design steps necessary for air quality compliance of the oil and gas production platforms known as "the Beta Facility," situated on the Outer Continental Shelf about nine miles off Huntington Beach, CA. Beta Offshore is headquartered at 111 W. Ocean Blvd., Suite 1240, Long Beach, CA 90802. The Facility is located on OCS Lease Parcels P300 and P301. The facts set forth herein are known personally to me to be true and correct, and I could and would so testify under oath if called as a witness.

Opening Summary

B. Regular Variance Granted: On December 7, 2023, the Hearing Board granted Beta Offshore (Beta) a regular variance until November 16, 2024 from certain requirements under District Rules 1110.2, 1134, 1100 and 2012 and 3002, as well as a number of permit conditions detailed below in Paragraph N. The variance was granted for six internal combustion (“rig”) engines, nine selective catalytic reduction units, six turbines (three Saturn Turbines and three Centaur Turbines and three urea injection skids (one on each of the three Beta platforms). The December 15, 2023 Hearing Board Minute Order, detailing the District Rules, Permit Conditions and equipment descriptions is attached to this Declaration as **Attachment A** to provide, among other things, a convenient list of the existing variance conditions. My declaration for the December 7, 2023, which provides facts upon which Beta based its petition for the regular variance is also attached to this Declaration as **Attachment B**. (Note: Permit Condition F2.1 – the maximum allowable daily emissions of NOx for the Facility – was withdrawn from the variance request prior to the hearing since Beta would still be required to comply with this daily mass emission limit.)

C. Status Report and/or Modification Hearing: Condition 20 of the Regular Variance states: The Parties shall appear before the Hearing Board for a status/modification hearing in April 2024. The hearing was subsequently scheduled for April 23, 2024. This declaration is Petitioner’s status update and request for modification and clarification to conditions of the December 7, 2023 regular variance. Petitioner does not request extension of the final compliance date.

D. Beta’s December 7, 2023 Case for the Regular Variance: Beta Offshore produces oil and gas from three platforms located about 9 miles offshore from Huntington Beach. Beta delivers crude oil to the refinery by pipeline. Beta relies on six internal combustion (IC) engines and six turbines to operate the platforms. Amendments to District Rules 1110.2 on November 1, 2019 and 1134 on February 4, 2022 require substantial NOx reductions from these engines and turbines. (Three turbines have now been replaced by electric motors and that element of compliance has been completed.)

While Beta began its Air Quality (AQ) Compliance Project in August 2018 in anticipation of the rule amendments, that progress was interrupted in the fall of 2021 (until April 2023) when the impact of prohibited anchor dragging by two 3rd party container vessels that snagged and ruptured Beta's pipeline manifested into an oil spill. For eighteen months Beta shut down all production and had little if any idea whether it would ever be able to resume normal operations. During that time, Beta was required by federal law to maintain personnel and facility safety systems on the platforms, yet had no revenue from the platforms. Beta primarily devoted resources to investigating and repairing damage to the pipeline. Beta did timely apply for the District permits required for the AQ Compliance Project.

On or about April 7, 2023, three federal agencies, with input from the California State Lands Commission, authorized Beta to resume use of the pipeline which allowed Beta to return to production. Immediately upon receipt of pipeline authorization, Beta reinstated and expedited the AQ Compliance Project, yet determined in the summer of 2023 that the Project could not be completed by the end of the year and that Beta would require variance relief.

More detail is provided in **Attachment B**, my Declaration for the December 7, 2023 hearing.

E. Status Summary and Request to Modify Three Variance Conditions: Beta complies with all variance conditions and foresees the need to request the following two modifications to conditions, and one clarification.

- Condition 5: The Fitch Company, which manufactures the Urea Injection Skids which are a component of the SCR systems, experienced major flooding in mid-December 2023. Please see **Attachment C**, the January 24, 2024 letter from Fitch to CECO Environmental, Beta's contractor, and photographs of the flooding in Rumford, Maine. As stated in the letter, two of the three required skids, referred to as "panels," were destroyed and have to be replaced. Because of this flood damage, Beta requests that the specific date deadlines for retrofit of the Centaur Turbines in Condition 5 be extended – by one month for the first two and by fifteen days for the third. The requested modification is as follows:

5. Petitioner shall complete the retrofit of the Centaur Turbines according to the following schedule:
- a. Within seventy-five (75) days of receipt of the selective catalytic reduction (“SCR”) system for at least one of the three Centaur Turbines and no later than ~~May 30, 2024~~ June 30, 2024.
 - b. For the second of the three Centaur Turbines, within sixty (60) days of completing the commissioning of the first Centaur Turbine and no later than ~~July 31, 2024~~ August 30, 2024. (Commissioning is required to ensure the safety and reliability of each device, and includes processes and tests to ensure all systems and components have been installed, hooked up, and programmed properly. This also includes management of change (MOC), pre-start safety review (PSSR) and quality assurance/quality control (QA/QC) sign-offs by the company.).
 - c. For the third of the three Centaur Turbines, within sixty (60) days of completing the commissioning of the prior two Centaur Turbines and no later than ~~September 30, 2024~~ October 15, 2024.

- Condition 9: Because safety and environmental protection require operating three Centaur Turbines during maintenance, source testing, commissioning of new turbines and commissioning after turbine retrofit, Beta requests clarification of Condition 9 to expressly state these exceptions to the limit on operating only two Centaurs at one time. Two of Beta’s three Centaur Turbines run continuously to prevent possible unplanned power outages. If one of the two running turbines were to fail without the third turbine being maintained in good working order and readily available to replace the failed turbine, the platforms would lose critical power which would inhibit the facility safety systems from functioning as designed and would lead to unnecessary risks to facility personnel and the environment. Maintaining all Centaur Turbines in good working order periodically requires the activities referenced above. During turbine maintenance, Beta is required to briefly run the Centaur Turbine undergoing maintenance as well as the two Turbines powering the platforms and platform safety systems. Centaur Turbine run time and the need to run three Turbines simultaneously depends on the type of maintenance:

Centaur Turbine biannual maintenance will require 4 to 6 hours total for each Turbine, including startup and shutdown. One Centaur is scheduled for full replacement. During the 24-hour commissioning procedure for the new Centaur, three turbines will only be run simultaneously during startup and shutdown to avoid loss of electrical load. This scenario requiring running three Centaurs simultaneously also applies when the Centaurs are source tested, commissioned after retrofit with SCR, and when a new Centaur is commissioned. All these scenarios fall within Condition 9's existing exception for "an emergency that creates a risk to the health and safety of personnel and/or environment that cannot be avoided without operating an additional Centaur Turbine." Beta request clarification that the stated scenarios fall within that exception. The requested clarification is as follows:

9. During the term of this variance, Petitioner shall operate no more than any two of the three Centaur Turbines at a given time, except when maintenance or source testing of these Turbines (as described in Paragraph 8 of Petitioner's variance petition) requires operation of three Turbines, during commissioning of a new Centaur Turbine, during commissioning after retrofit of a Centaur Turbine, or in the event of another emergency that creates a risk to the health and safety of personnel and/or environment that cannot be avoided without operating an additional Centaur Turbine.

- Condition 12.d: Because of more challenging working conditions (no crane access and safety procedures for working over water) on Platform Ellen, Beta requests more time for retrofitting the 4th Rig Engine, the first Rig Engine on Platform Ellen, by modifying Condition 12.d to allow 30 days instead of 14 days for the retrofit. The requested modification is as follows:

12.d. For the fourth of the six Rig Engines, within ~~fourteen (14)~~ thirty (30) days of completion of structural modification and deck extension on Platform Ellen;

Summary of Compliance with Variance Conditions

F. “Saturn Turbines” – Device ID Nos. D95, D96 and D97, Conditions 1 through 3

STATUS: Compliance.

Condition 1: All three Saturn Turbines ceased operation on January 27, 2024, before their respective deadlines, and were fully removed from the platform on February 29, 2024. The water injection capabilities of the Saturn driven pumps were replaced by electric motors.

Condition 2: Grants Beta the discretion to select the sequence of ceasing Saturn Turbine operation.

Condition 3: Beta submitted the required Form 200-C for all three devices on March 19, 2024, within the 30-day allowed time period.

G. “Centaur Turbines” – Device ID Nos. D98, D99 and D100, Conditions 4 through 10

STATUS: Compliance, and anticipated need for extensions.

Condition 4: Beta timely submitted the source test protocol to the District to determine Rule 1134 compliance on February 5, 2024.

Condition 5: Please see the first item in *Paragraph E. Status Summary and Request to Modify Three Variance Conditions*, above. Because of flooding at the Manufacturer and destruction of two of three required Urea Injection Skids, Beta requests extensions to the deadline dates for retrofit of SCR to each Centaur Turbine.

Condition 6: Grants Beta the discretion to select the sequence of Centaur Turbine retrofit.

Condition 7: Deadline for source testing, compliance anticipated.

Condition 8: Deadline for submittal of source test results, compliance anticipated.

Condition 9: Compliance, clarification requested. Please see the second item in *Paragraph E. Status Summary and Request to Modify Three Variance Conditions*, above. Beta requests clarification that maintenance, source testing and commission of new or retrofitted Centaur Turbines, which all require various periods of running three turbines

simultaneously, are necessary to protect safety of personnel and the environment. Accordingly these activities fit within the existing emergency exception to the limit on running more than two turbines at a time.

Two of Beta's three Centaur Turbines run continuously to prevent possible unplanned power outages. If one of the two running turbines were to fail without the third turbine being maintained in good working order and readily available to replace the failed turbine, the platforms would lose critical power which would inhibit the facility safety systems from functioning as designed and would lead to unnecessary risks to facility personnel and the environment. Maintaining all Centaur Turbines in good working order periodically requires the activities referenced above. During turbine maintenance, Beta is required to briefly run the Centaur Turbine undergoing maintenance as well as the two Turbines powering the platforms and platform safety systems. Centaur Turbine run time and the need to run three Turbines simultaneously depends on the type of maintenance: Centaur Turbine biannual maintenance will require 4 to 6 hours total for each Turbine, including startup and shutdown. One Centaur is scheduled for full replacement. During the 24-hour commissioning procedure for the new Centaur, three turbines will be run simultaneously during startup and shutdown to avoid loss of electrical load. This scenario requiring running three Centaurs simultaneously also applies when the Centaurs are source tested, commissioned after retrofit with SCR, and when a new Centaur is commissioned. All these scenarios fall within Condition 9's existing exception for "an emergency that creates a risk to the health and safety of personnel and/or environment that cannot be avoided without operating an additional Centaur Turbine." Beta request clarification that the stated scenarios fall within that exception.

Condition 10: Beta maintains a monthly usage log for the Centaur Turbines according to the criteria enumerated in this condition, including any emergency usage under Condition 9 and timely submits the log for the prior month to District personnel.

H. Internal Combustion Rig Engines – Device ID Nos. D81, D82, D83, D84, D85 and D86 – Conditions 11 through 18

Condition 11: Beta timely submitted the source test protocol to the District to determine Rule 1110.2 compliance on February 5, 2024.

Condition 12: Petitioner shall retrofit the six Internal Combustion Rig Engines to demonstrate compliance with Rule 1110.2(d)(1) according [the stated schedule]. Compliance, anticipated need for extension of deadline for one of six Rig Engines. Please see the third item in *Paragraph E. Status Summary and Request to Modify Three Variance Conditions*, above. As detailed there, Beta will comply with all the rig engine retrofit deadlines except 12.d, for which Beta requests an extension from fourteen (14) days to thirty (30) days from completion of structural modification and deck extension on Platform Ellen.

Condition 13: NUMBER OMITTED.

Condition 14: Grants Beta the discretion to select the sequence of Rig Engine retrofit.

Condition 15: Deadline for source testing, compliance anticipated.

Condition 16: Deadline for submittal of source test results, compliance anticipated.

Condition 17: Compliance anticipated. Beta will not operate more than three of the Rig Engines at one time, except in the event of emergency. No Modification required.

Condition 18: Compliance. Beta maintains a monthly usage log for the Rig Engines according to the criteria enumerated in this condition, including any emergency usage under Condition 9 and timely submits the log for the prior month to District personnel.

I. Generally Applicable Conditions

Condition 19: Beta requested expedited review when submitting the Source Test Protocols and will comply when submitting the Source Test Reports.

Condition 20: Status/modification hearing in April 2024, now scheduled for April 23, 2024. Beta requests that this hearing be held on the Hearing Board's Consent Calendar, and will appear only if requested.

Condition 21: Excess emission fees. Beta has complied and will continue to comply with calculation and payment of excess emission fees according to the stated schedule.

Condition 22: Petitioner shall notify the Clerk of the Board in writing at

clerkofboard@aqmd.gov when final compliance has been achieved. Beta will comply as directed.

Condition 23: As a Title V facility, Petitioner shall notify US EPA after the issuance of the order. Compliance. Beta provided this notification to US EPA on or about February 28, 2024.

J. Expediting the Project: Beta continues to expedite the Compliance Project, has reduced excess emissions and moves toward final compliance on or before the Variance ending date of November 16, 2024:

- Engineering for the following:
 - Procurement and installation of the selective catalytic reduction systems
 - Hydraulic, electrical, structural and facility steps require for NOx reduction and synchronizing new equipment with existing
 - Further reduction of on-platform power generation
- Procurement of compliance project equipment and material

K. Equipment Operating under the Variance: Status: The equipment listed below remains subject to and requires the relief provided by the existing variance. Please note that the Saturn Turbines, which were initially under the variance are now in compliance. These three Turbines, no longer listed below, all ceased operation and were replaced by electric motors on or about January 27, 2024.

- Six Internal Combustion (Rig) Engines: Devices D81 through D86, Non-Emergency, Diesel Fuel, Caterpillar, Model D398PCTA, with aftercooler, Turbocharger, 853 BHP with generator, 600 KW.
- Six Selective Catalytic Reduction (SCR) systems to be retrofitted to those six IC (Rig) Engines: Devices C197 though C202, Umicore DNX-929 or Cormetech CMHCDST, with Oxidation Catalyst, Johnson Matthey, Model BX-70-D-8, 76 CU.FT. with Urea Injection System
- Three Centaur Gas Turbines: Devices D98 through D100, NJ-01-A, Diesel Fuel, Process Gas, Solar Model Centaur GCI-CB-ID, 42 MMBTU/HR

with Generator, 2.5 MW

- Three SCR systems to be retrofitted to those three Centaur Turbines: Devices C203 through C205, Umicore DNX-929 or Cormetech CMHCDST, with Oxidation Catalyst, Johnson Matthey, Model BX-70-D-8, 76 CU.FT. with Urea Injection System

L. Why the Equipment is Necessary to Operations: The Facility (SCAQMD ID 166073) includes three offshore platforms: Elly, Ellen and Eureka located approximately 9 miles offshore from Huntington Beach and 15 miles from Long Beach Harbor.

Due to the location of the Platforms, only a limited amount of electrical power is available from the on-shore SCE municipal grid. Given this limited access to power, the three (3) Centaur turbines and their generators located on Platform Elly are essential to provide the required amount of electrical power to operate the Facility

The six (6) Rig Engines regulated under District Rule 1110.2, are located three (3) on Platform Eureka and three (3) on Platform Ellen. These engines power their respective drilling rigs to maintain the wellbore integrity of the subsea wells. As noted above under discussion of the variance conditions, these engines are also necessary to maintain operation of the platform safety systems, especially during complex well remediation.

M. Regular Maintenance and Inspection: The equipment is and will be constantly maintained and the maintenance program that is currently in place will continue throughout the variance period, including:

- Daily visual inspections
- Corrective maintenance as required based on daily inspections
- Quarterly visual emissions inspections
- 400-hour inspections
- Bi-annual tune ups by qualified third parties
- Annual Comprehensive Maintenance by a qualified third party, including tearing down and rebuilding engines or swapping out engines according to a regular schedule based on hours of operation.

Status: As noted above under discussion of the Centaur Turbines, and Variance Condition 9,

it is necessary to operate three Centaur Turbines at the same time during certain maintenance procedures, source testing and for future commissioning of a new Turbine and of the Turbine retrofits. This is deemed within the emergency exception to Condition 9's limit to operating only two Centaurs at a time. Beta is requesting clarification of the exception in Condition 9 by amending the Condition's exception to include maintenance and commissioning.

N. Maintaining Variance Relief from Rules and Permit Conditions: For the existing Regular Variance, Beta required and continues to require relief from the following Rules and Permit Conditions:

- Rule 1134(d)(3), (e)(2) and (e)(3) -- The reduced NOx emission limits applicable to the Centaur Turbines could not be achieved by 01/01/2024
- Rule 2012 – Cannot comply until after SCR retrofit for reporting lower NOx limits
- Rule 11110.2(d), (e)(2), (e)(4), (e)(10), (f)((1)(C) and (f)(1)(D) -- The RECLAIM facility cannot meet the applicable NOx emission limit by 12/31/2023
- Rule 1303 (a)(1)-BACT -- Operator cannot comply with equipment being equipped with BACT until SCR are installed
- Rule 1100(d)(1)(B) -- Operator cannot meet the RECLAIM transition requirements for Rule 1110.2 by 12/31/2023, as required by this reference in Rule 1100.
- Permit Condition (PC) A63.15 – NOx emissions may exceed 6.1 lb/day limit for Rig Engines.
- PC A63.16 – NOx emissions may exceed 117.5 lb/day for gas turbines
- PC D12.8 – Temperature gauge cannot be monitored and maintained until SCR is installed to Rig Engines
- PC D12.9 – Pressure gauge cannot be monitored and maintained until SCR is installed to Rig Engines
- PC D12.10 – Flow meter cannot indicate the urea injection flow rate until SCR is installed to Rig Engines
- PC D12.11 -- Flow meter cannot indicate the urea injection flow rate until

SCR is installed to the Rig engines

- PC D12.12 -- Temperature gauge cannot be monitored and maintained until SCR is installed to the Centaur gas turbines
- PC D12.13 -- Pressure gauge cannot be monitored and maintained until SCR is installed to the Centaur gas turbines
- PC D12.14 -- Flow meter cannot indicate the urea injection flow rate until SCR is installed to the Centaur gas turbines
- PC D29.5 -- Source test at the outlet of the SCR serving the equipment cannot be performed until SCR is installed to the Rig Engines
- PC D29.6 -- Source test at the outlet of the SCR serving the equipment cannot be performed until SCR is installed to the Centaur gas turbines
- PC E193.2 -- Cannot assure compliance with backpressure limit until equipment is installed and operating
- PC E448.4 -- Rig engines will be in noncompliance of the I&M plan
- PC E448.9 -- Operator may not be able to comply with timeline requirements of the I&M plan submittal
- PC H23.10 -- Rig engines cannot comply with requirements in Rule 1110.2 by 12/31/2023
- PC H23.9 -- Centaur gas turbines cannot comply with requirements in Rule 1134 by 1/1/2024

O. Equipment or Activities Under Variance Coverage?: No other equipment or activities are currently under variance coverage.

P. Any Notices of Violation or to Comply Within Past Year?: Status: None since December Hearing. As provided in the Declaration for the December 7, 2023 hearing, the District issued two notices of violation to Beta during the past year. No NOV's have been issued to Beta since the December hearing. NOV P79006 was issued May 18, 2022 primarily for fugitive leaks [more than one year before the December 7, 2023 hearing] and a failed source test by Rig Engine D81. NOV P73299 was issued July 25, 2023 for failed source tests by Rig Engines D81 and D82. These engines were source tested again on November 27, 2023, and

showed successful compliance.

Q. Public Complaints Within Six Months?: Status: There have been no complaints from any Member of the Public within the last six months or the six months prior to the December 7, 2023 variance hearing.

R. Beyond Reasonable Control: The Hearing Board granted Beta the Regular Variance based on, among other things, the finding that the need for this regular variance is beyond Beta Offshore's reasonable control. The anchor dragging by two vessels in a no anchor dragging zone in September 2021 was not only beyond Beta Offshore's control, but Beta did not know and was not informed by the Coast Guard or the LA-Long Beach Marine Exchange. With sufficient notice of the displacement caused to the pipeline by the illegal anchor dragging, Beta could have avoided the subsequent oil spill. During the 18-month shutdown of all production and all platform revenue, Beta devoted its attention and resources towards investigating the cause and damage from the pipeline rupture, completing the necessary remediation activities, repairing and performing other corrective actions, and pursuing relief for the damage to its operations and against the third parties that caused the pipeline rupture. Despite this focus, Beta timely applied for and received the District permits required for the steps toward compliance. During this 18-month period, Beta had no certainty that it would be allowed to return to using the repaired pipeline or to resume offshore production.

S. Harm to Beta if Requested Modifications Not Granted: If the requested modifications to the existing variance were not granted, Beta would in the near future violate Conditions 5 and 12.d of the existing Variance. Because the deadlines in question are not resolved by shutdown of the related equipment until compliance is achieved, Beta would face potential revocation of the Variance. Without the relief provided by the Variance, the expected economic losses for Beta are extremely variable and dependent on multiple factors, including but not limited to commodity prices, operating expenses, and required capital investments. The revenues currently generated from Beta production continue to be critical to funding the large investment required to achieve the compliance discussed in this petition. If the requested modifications are not granted and this results in noncompliance and variance revocation,

multiple employees would be laid off, and many supply chains would be negatively impacted or closed. These services directly impact the local community and taxable state revenue such as marine / dock services, local transportation, skilled laborers and professionals, such as engineers and consultants, as well as local manufacturing and material suppliers. Additionally, the royalties paid by Beta to the Federal government helps fund local offices and personnel at the Bureau of Safety and Environmental Enforcement (BSEE) and the Bureau of Ocean Energy Management (BOEM). Beta also works closely with the University of Southern California, NASA and NOAA by supporting their oceanic and atmospheric research as they utilize Beta offshore equipment when that equipment is operating.

T. Excess Emissions:

For the December 7, 2023 Hearing: Total daily excess emissions, calculated on a potential to emit/worst case basis are 3,495 pounds per day of NOx. Mitigation steps detailed in the next Paragraph will reduce these emissions by 1,531 pounds NOx per day, leaving final excess emissions at 1,964 pounds NOx per day. While Beta takes excess emissions seriously, and is expediting efforts to complete the AQ Compliance Project, please note that these emissions will occur approximately nine miles from shore.

Status Update: Monthly reporting of excess emissions shows the following:

*For the month of January 2024, net emissions were 517 lbs/day, as compared to the PTE with no mitigation of 3,495 lbs/day, showing a reduction of 2,978 lbs/day.

*For the month of February 2024, net emissions were 642 lbs/day, as compared to the PTE with no mitigation of 3,495 lbs/day, showing a reduction of 2,853 lbs/day.

* For the month of March 2024, net emissions were 670 lbs/day, as compared to the PTE with no mitigation of 3,495 lbs/day, showing a net reduction of 2825 lbs/day.

U. Mitigation of Excess Emissions: Beta will continue to mitigate the remaining excess emissions by the following:

- Beta will only operate 2 of 3 Centaur electricity-generating turbines during the period of non-compliance, except when maintenance or source testing of these Turbines requires operation of three Turbines, during commissioning of a new Centaur

Turbine, during commissioning after retrofit of a Centaur Turbine, or in the event of another emergency that creates a risk to the health or safety of personnel and/or environment, thus mitigating emissions from this one large turbine source.

- As of August 30, 2023, substantial electrical load from the Centaurs had already been shifted to the municipal power grid, reducing natural gas and diesel usage and emissions. This has created a 50 to 80 percent reduction in fuel consumed and substantially reduced emissions. Further shift to shore power will occur shortly.
 - Beta will only operate 3 of the 6 rig engines at any one time unless an emergency situation arises and creates a risk to personnel and/or environment that cannot be avoided without operating one the additional rig engine.

V. Beta on Track for Final Compliance by the November 16, 2024 Date:

Beta remains on track for final compliance by the November 16, 2024 date required by the Hearing Board’s Minute Order. Only two intermediate milestones in Variance Conditions 5 and 12.d would benefit from modification, and Beta would appreciate clarification of the specific emergency situations that justify running all three Centaur Turbines under Paragraph 9.

Conclusion

W. Respectful Request: As detailed above in Paragraph E, Beta Offshore respectfully requests that the Hearing Board grant Beta’s requests for modification of Variance Condition 5 (date deadlines for retrofit of the Centaur Turbines), Condition 9 (clarification that running all three Centaur Turbines is essential during maintenance, source testing and commissioning of new or retrofitted Turbines, as well as other emergencies), and Condition 12.d (extension by sixteen (16) days of the deadline for retrofitting the fourth Rig Engine).

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Y. Beta Offshore appreciates the opportunity to update the Hearing Board about its progress toward full compliance with the amended emission limits under District Rules 1110.2 and 1134. Beta will be happy to address any questions the Hearing Board Members may have with regard to this progress .

I declare under penalty of perjury, under the laws of the State of California and the United States of America, that the foregoing is true and correct to the best of my knowledge and that this affidavit was executed this 12th day of April 2024 at Houston, Texas.



Jeff Ortloff
Director, Facilities Engineering
Amplify Energy Corp., Parent Company to
Beta Offshore Operating, LLC

Attachments:

- Attachment A: Minute Order for the Regular Variance, December 15, 2023
- Attachment B: Declaration of Jeff Ortloff, Exhibit #6 for the December 7, 2023 Regular Variance hearing
- Attachment C: Letter and photographs from The Fitch Company, January 24, 2024, regarding delay of Urea Injection Skids because of historic flooding