July 19, 2022

VIA CERTIFIED MAIL: # 7018 0680 0002 2475 8464

EES Case Management Unit
Environmental and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611

Re: DJ # 90-5-2-1-12026
Initial Submission of Semi-Annual Report – Consent Decree
United States vs. Gulfport Energy Corporation

To Whom it May Concern:

Pursuant to the requirements of DJ case # 90-5-2-1-12026, Gulfport Energy Corporation is submitting items for the Semi-Annual Report.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Per the requirements of the Consent Decree, the following individuals/groups have been either mailed or emailed a copy of these items: eescdcopy.enrd@usdoj.gov, Air and Radiation Division (USEPA Region V), Office of Regional Counsel (USEPA Region V), peachey.robert@epa.gov, topinka.natalie@epa.gov, loukeris.constantinos@epa.gov, stimmermeyer@gulfportenergy.com, don.shandy@crowedunlevy.com. If you have any questions regarding this submission, please contact Jace Marshall at jmarshall@gulfportenergy.com.

Sincerely,

Stephanie R. Timmermeyer
Vice President of EHSR and Supply Chain
Gulfport Energy

Enclosure

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Gulfport Energy Corporation – Semi Annual Consent Decree Report
DJ # 90-5-2-1-12026

Paragraph 19
There have not been any modifications to any Vapor Control Systems.

Paragraph 21
Quarterly DIPM maintenance was conducted.

Paragraph 22
Instances of Reliable Information are documented on Attachment A. There were no instances that triggered an RCA under Paragraph 22 that were not included in an RCA under Paragraph 23.

Paragraph 23
Tank Pressure Monitoring is in effect. Five (5) VCS Root Cause Analyses were conducted on five (5) pads.

- Attachment B – Boy Scout Tank Pressure Exceedance RCA
- Attachment C – Millikin Tank Pressure Exceedance RCA
- Attachment D – Miller Tank Pressure Exceedance RCA
- Attachment E – Ripley Tank Pressure Exceedance RCA
- Attachment F – Michael Tank Pressure Exceedance RCA

Non-Compliance w/ PTIOs

Per the requirements of the PTIOs, Gulfport submits any deviation in the annual Permit Evaluation Report. While uptime has been significantly high at 99.28% during the applicable reporting period, there were instances of combustor downtime while a facility was operating. See Attachment G for combustor downtime records.

Attachment A - Reliable Information (Paragraph 22)

Tank System	Reliable Information Date	Corrective Action(s) Date	Description of Corrective Actions	Paragraph 22 RCA Required
Boy Scout	11/9/2021	11/9/2021	Tanks 1, 4 and 5 Thief Hatches were leaking. The operator tightened the bolts on the hatches and they were rechecked and not leaking.	No
Boy Scout	3/8/2022	3/10/2022	The Enardo relief valve on the tank VCS was venting. It was successfully repaired on 3/10/22 and rechecked on 3/16/22.	No
Karen	6/27/2022	6/27/2022	The thief hatches on the Gun Barrel, Tank 1 and Tank 11 were leaking. The operator disassembled and cleaned the sealing surfaces. He reassembled and checked again and there were no leaks.	No
Lyons	3/16/2022	3/16/2022	Found the thief hatch on Tank 2 was leaking. Operator disassembled and cleaned the sealing surfaces on 3/16/22. Site was rechecked on 3/21/22 and no leaks were observed.	No
Michael	6/8/2022	6/13/2022	The thief hatches on Tank 1 and Tank 2 were leaking. They were repaired on 6/13/22.	No
Miller	4/8/2022	4/11/2022	The thief hatch on Tank 3 was leaking. Operator was on site during the inspection and cleaned the sealing surface on the hatch. Re-checked after the repair was made and it was not leaking.	Yes - details included in Paragraph 23 RCA
Miller	4/29/2022	4/30/2022	The thief hatches on Tanks 1, 2, 3 ,4, 6, 7 and 8 were found to be leaking. All 7 of the hatches were removed and the sealing surfaces were cleaned on 4/30/22; Site was rechecked later that day and no leaks were found.	Yes - details included in Paragraph 23 RCA
Miller	6/8/2022	6/13/2022	The thief hatches on Tanks 1, 2, 3 ,4, 6, 7 and 8 were found to be leaking. All 7 of the hatches were removed and the sealing surfaces were cleaned on 6/9/22; Site was rechecked on 6/13/22 and no leaks were observed.	Yes - details included in Paragraph 23 RCA
Milliken	1/14/2022	1/27/2022	Thief hatch on Tank 3 was leaking; operator cleaned the hatch and site was rechecked and no leaks were observed.	Yes - details included in Paragraph 23 RCA
Milliken	2/17/2022	2/22/2022	Site Investigation with the FLIR camera revealed that Tank # 2 thief hatch was leaking. It was noted that Tank 2 was the oil tank that was filling at the time of the pressure exceedance. The thief hatch was cleaned and the site was rechecked and no leaks were observed.	Yes - details included in Paragraph 23 RCA
Milliken	5/15/2022	5/15/2022	The thief hatches on Tanks 1 and 3 were leaking. They were disassembled and the sealing surface was cleaned. They were rechecked after the cleaning and not found to be leaking.	Yes - details included in Paragraph 23 RCA
Ripley	3/10/2022	3/10/2022	The thief hatches on Tank 6 and 8 were leaking. Operator disassembled both hatches and cleaned the sealing surfaces. Tanks were rechecked the same day and were leak free.	No
Ripley	5/16/2022	5/16/2022	During the site investigation the thief hatches on Tanks 6 and 8 were found to be leaking. The hatches were disassembled and the sealing surfaces were cleaned. They were reassembled and rechecked and found to be not leaking.	No

ATTACHMENT B - ROOT CAUSE ANALYSIS REPORT (PARAGRAPH 23)

ORGANIZATION	
AGENCY	Ohio EPA
PROGRAM/FACILITY	Boy Scout Tank Battery Vapor Control System (VCS)
REFERENCE NUMBERS	Facility ID: 0634005048 Permit Number: P0118285
REGION	EPA Region 5
DATE OF EVENT: 1/11/22 10:55 am	DATE RCA COMPLETED: 3/22/22

EVENT DETAILS	
EVENT DESCRIPTION	LIST RCA TEAM MEMBERS
On the date of the event, the 3rd "trigger point" tank pressure exceedance in a consecutive 30 day calender period based on the tank pressure monitoring occurred. The "trigger point" for this VCS is 12 oz. The 1st exceedance occurred on 12/12/21 and the 2nd exceedance was on 1/7/22. For all 3 occurrences, a "Site Investigation" was conducted using an IR camera. No emissions were observed at the tank system. 5 additional exceedances ocurred between 1/18/22 and 3/8/22. Reliable information was revealed on the 8th exceedance dated 3/18/22.	TEAM LEADER: Judson Shreves Andy Baker Jennifer Huffhines Jace Marshall

BACKGROUND SUMMARY

Answer these questions with a brief summary - attach supporting documents if available

Paragraph 23 (b) of the Consent Decree establishes the process to follow when pressure monitor measurement exceeds the "trigger point" at a Tank System. The "trigger point" is defined as the lowest set point of any pressure relief device on the tank system, minus 2 oz. For this Tank system the "trigger point" is 12 oz. When the "trigger point" is exceeded, a Site Investigation is required. The Site Investigation shall be conducted with an IR Camera and must be performed no later than the end of the calendar day following the measurement that exceeded the "trigger point". In the event that the Tank System requires 3 Site Investigations in a consecutive 30 day period, a VCS Root Cause Analysis must be performed within 90 days and identify appropriate response actions to be taken to address any common operation, maintenance or design cause identified, along with a proposed schedule for the implementation of those response actions.

EXCEEDANCE # 1	DATE: 12/12/2021	DURATION: < 15 minutes
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	NO	***If YES, explain the deviation:***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	YES	***If YES, explain:*** When the operator initially responded to the alarm, it was determined that the water dump valve on Boy Scout 4-33H was leaking by causing pressure to build in the Tank System.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	YES	***If YES, what actions were taken:*** The water dump valve was taken apart and hydrates were found obstructing the plunger from seating allowing gas to get by.
Was there a human action or inaction that contributed to the adverse event?	NO	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	YES	***If YES, describe the equipment and how it appeared to contribute:*** A hydrate in the dump valve was causing it to malfunction by not allowing the plunger to seat.
Was there a corrective action implemented?	YES	***If YES, explain:*** The hydrate was removed. The dump valve was put back together and tested. The well was returned to production.
EXCEEDANCE # 2	**1/7/2022**	**DURATION: 6 hours 26 minutes**

Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** When the operator arrived to location he discovered that a manual dump valve on a scrubber bottle on the gas lift compressor was leaking by.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The manual dump valve was replaced with a new valve.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The compressor scrubber dump valve was found to be leaking by. It's purpose is to dump fluids to the tank battery, but since it was leaking it was sending gas to the tank battery causing it to overpressure.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** The manual dump valve was replaced.
EXCEEDANCE # 3	**1/11/2022**	**DURATION: < 10 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:***
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The separator pressure and coriolis meter trends on all 4 wells showed no evidence of any of the separator dump valves hang open. When trending plunger arrivals, it was noted that Boy Scout 5-33H arrived at 9:54 am. The pressure exceeded 12 oz at 9:55 am. The oil tank gained ~ 2 bbls between 9:45 am and 10 am.
Was there a corrective action implemented?	**NO**	*If YES, explain:*
EXCEEDANCE # 4	**1/18/2022**	**DURATION: < 10 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:***

During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:*** The separator pressure and coriolis meter trends were reviewed on all 4 wells and showed no evidence of any of the separator dump valves hung open. When trending plunger arrivals, it was noted that the Boy Scout 5-33H plunger arrived at 1:46 pm. The pressure began to build in the tank after 1:55 pm and exceeded 12 oz at 2 pm. The oil tank gained 0.8 bbls between 1:45 pm and 2 pm.
Was there a corrective action implemented?	**NO**	*If YES, explain:*
EXCEEDANCE # 5	**1/29/2022**	**DURATION: 3 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**NO**	***If NO, explain:*** Alarm was initially overlooked due to a discrepancy in the alarm settings. A 'warning' alarm was received prior to the pressure reaching 12 oz. and it wasn't cleared, which resets the alarm status. Therefore when the pressure exceeded 12 oz., it didn't sent additional alarm due to the 'warning' alarm. Alarm settings in the system were adjusted to mitigate this issue going forward.
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** When the operator initially responded to the tank pressure alarm, he found the combustor valve was closed due to a loss of supply pressure caused by freezing.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO (see comments)**	***If YES, describe the equipment and how it appeared to contribute:*** The operator found the pressure supply to the combustor valve was frozen. When the valve lost supply pressure it closed as it is designed to do.
Was there a corrective action implemented?	**NO**	
EXCEEDANCE # 6	**1/30/2022**	**DURATION: 3 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** During the Site Investigation the operator discovered that a manual dump valve on a scrubber bottle on the gas lift compressor was leaking by.

During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The manual dump valve was replaced with a new valve.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The compressor scrubber dump valve was found to be leaking by. It's purpose is to dump fluids to the tank battery, but since it was leaking it was sending gas to the tank battery causing it to overpressure.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** The manual dump valve was replaced.
EXCEEDANCE # 7	**2/10/2022**	**7 min**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:***
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The separator pressure and coriolis meter trends were reviewed on all 4 wells and showed no evidence of any of the separator dump valves hung open. When trending plunger arrivals, it was noted that the Boy Scout 4-33H plunger arrived at ~3:14 am and the 5-33H plunger arrived at ~3:09 am. The pressure exceeded 12 oz at 3:05 am. The oil tank gained 9 bbls between 3 am and 3:30 am.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 8	**3/8/2022**	**30 min**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**YES**	***If YES, explain the deviation.*** The Enardo tank relief valve was found to be leaking excessively.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** When the operator initially responded to the alarm, it was determined that the oil dump valve on Boy Scout 4-33H was leaking by causing pressure to build in the Tank System.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The oil dump valve was taken apart and no issues were observed. The operator adjusted the LLC and observed a dump cycle to insure proper operation. The leaking Enardo valve was adjusted and that stopped the leak. It was rechecked in 3/16/22 and no leaking was observed.

Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The LLC was out of adjustment.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** The LLC on the oil dump was adjusted.

ATTACHMENT C - ROOT CAUSE ANALYSIS REPORT (PARAGRAPH 23)

ORGANIZATION	
AGENCY	Ohio EPA
PROGRAM/FACILITY	Milliken Tank Battery Vapor Control System (VCS)
REFERENCE NUMBERS	Facility ID: 0634005072 Permit Number: P0118176
REGION	EPA Region 5
DATE OF EVENT: 2/6/22 10:55 am	DATE RCA COMPLETED: 4/20/22

EVENT DETAILS	
EVENT DESCRIPTION	LIST RCA TEAM MEMBERS
On the date of the event, the 3rd "trigger point" tank pressure exceedance in a consecutive 30 day calender period based on the tank pressure monitoring occurred. The "trigger point" for this VCS is 12 oz. The 1st exceedance occurred on 12/12/21 and the 2nd exceedance was on 1/7/22. There were 3 additonal exceedances between 2/6/22 and 3/6/22. For all 6 occurrences, a "Site Investigation" was conducted using an IR camera. Tank 3 hatch was observed leaking on the 1st exceedance. The pressure transducer was moved to a different tank since it was mounted to the tank that is routinely unloaded into	TEAM LEADER: Judson Shreves Andy Baker Jennifer Huffhines Jace Marshall

BACKGROUND SUMMARY

Answer these questions with a brief summary - attach supporting documents if available

Paragraph 23 (b) of the Consent Decree establishes the process to follow when pressure monitor measurement exceeds the "trigger point" at a Tank System. The "trigger point" is defined as the lowest set point of any pressure relief device on the tank system, minus 2 oz. For this Tank system the "trigger point" is 12 oz. When the "trigger point" is exceeded, a Site Investigation is required. The Site Investigation shall be conducted with an IR Camera and must be performed no later than the end of the calendar day following the measurement that exceeded the "trigger point". In the event that the Tank System requires 3 Site Investigations in a consecutive 30 day period, a VCS Root Cause Analysis must be performed within 90 days and identify appropriate response actions to be taken to address any common operation, maintenance or design cause identified, along with a proposed schedule for the implementation of those response actions.

EXCEEDANCE # 1	DATE: 1/13/22	DURATION: 1 minute
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	YES	***If YES, explain the deviation.*** The thief hatch on Tank 3 was leaking.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	YES	***If YES, explain:*** When the operator arrived he found that the pad had shut in due to a PSL on the Heater Treater. The dump valves were closed and functioning, but it was determined that one valve must have hung open causing the pressure exceedance.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	YES	***If YES, what actions were taken:*** The leaking thief hatch on Tank 3 was disassembled and the sealing surface was cleaned. It was reassembled and checked again and no leaks were found.
Was there a human action or inaction that contributed to the adverse event?	NO	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	YES	***If YES, describe the equipment and how it appeared to contribute:*** The Heater Treater pressure dropped below the PSL setpoint due to a dump valve hanging open. The valves were checked during the initial site inspection and no issues were discovered.
Was there a corrective action implemented?	NO	***If YES, explain:***

EXCEEDANCE # 2	2/5/2022	DURATION: 1 minute
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** When the operator arrived to location he determined that the Milliken 1-4H oil dump valve had hung open causing the pressure exceedance.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The operator replaced the trim/seat in the oil dump valve on Milliken 1-4H and adjusted the LLC.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The dump valve was leaking by.
Was there a corrective action implemented?	**NO**	***If YES, explain:*** The trim/seat on the leaking dump valve was replaced and the LLC was adjusted.
EXCEEDANCE # 3	**2/5/2022**	**DURATION: 10 hr 59 min**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:*** The pad shut in approximately 2-1/2 hours after the exceedance and remained shut in until 9:30 on 2/6/22. Due to inclement winter weather the night operator was unable to respond due to road conditions. When the day operator arrived on the morning of 2/6/22 he did not find any equipment malfunctions. He did note that the transducer had a heavy coating of ice on it and also noted that several other pads were reading higher than normal pressures for the same reason.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** It is believed that the heavy coating of ice on the transducer was causing a false reading.
Was there a corrective action implemented?	**NO**	*If YES, explain:*
EXCEEDANCE # 4	**2/6/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***

Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The operator was unloading a well into the same tank where the pressure transducer is mounted. He had the tank hatch open for the unloading event and the transducer was still reading 13.18 oz when there was no pressure on the tank.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** *It is b* elieved that the heavy coating of ice on the transducer was causing a false reading since the transducer was measuring 13.18 oz when the hatch was open and there was no pressure on the tank.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 5	**2/16/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** Operator did not find any equipment malfunction. Review of the data from the SCADA system indicated a stuck dump valve on Milliken 2-4H. This was based on the separator pressure dropping from 122 psig at 7:50 pm to 11.5 psig at 7:55 pm. The exceedance occurred at 7:52 pm.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The thief hatch on Tank 2 was leaking. The hatch was cleaned and rechecked and no leaks were observed.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** One *of the dump valves had to have hung open based on the separator pressure trend. The coriolis* trend did not indicate which dump valve.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** Both dump valves on the Miliken 2-4H were replaced.
EXCEEDANCE # 6	**3/6/2022**	**DURATION: 12 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The Milliken 3-4H was being unloaded to Tank 1 from 6:45 am to 7:10 am. The tank hatch was open but it was noted that the transducer is mounted on the same tank that was being unloaded into and it is believed that the gas pressure built up faster than it could be relieved from the hatch.

During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**YES**	***If YES, explain:*** The transducer was mounted to a different tank since only Tank 1 is hooked up to the unloading line.
EXCEEDANCE # 7	**3/6/2022**	**DURATION: 4 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:*** The Milliken 3-4H was being unloaded to Tank 1 from 8:30 am to 8:42 am. The tank hatch was open but it was noted that the transducer is mounted on the same tank that was being unloaded into and it is believed that the gas pressure built up faster than it could be relieved from the hatch.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:*** The transducer was mounted to a different tank since only Tank 1 is hooked up to the unloading line.

ATTACHMENT D - ROOT CAUSE ANALYSIS REPORT (PARAGRAPH 23)

ORGANIZATION	
AGENCY	Ohio EPA
PROGRAM/FACILITY	Miller Tank Battery Vapor Control System (VCS)
REFERENCE NUMBERS	Facility ID: 0630005042 Permit Number: P0117671
REGION	EPA Region 5
DATE OF EVENT: 4/29/22 1:08 pm	DATE RCA COMPLETED: 6/30/2022

EVENT DETAILS	
EVENT DESCRIPTION	LIST RCA TEAM MEMBERS
On the date of the event, the 3rd "trigger point" tank pressure exceedance in a consecutive 30 day calender period based on the tank pressure monitoring occurred. The "trigger point" for this VCS is 12 oz. The 1st exceedance occurred on 4/7/22 and the 2nd exceedance was on 4/11/22. There were 7 additional exceedances between 4/30/22 and 6/17/22. For all 10 occurrences, a "Site Investigation" was conducted using an IR camera. On Exceedance 1 and 3 there was reliable information found. Tank hatch 3 was leaking on Exceedance 1 and there were 7 hatches found leaking on Exceedance 3	TEAM LEADER: Judson Shreves Andy Baker Jennifer Huffhines Jace Marshall

BACKGROUND SUMMARY

Answer these questions with a brief summary - attach supporting documents if available

Paragraph 23 (b) of the Consent Decree establishes the process to follow when pressure monitor measurement exceeds the "trigger point" at a Tank System. The "trigger point" is defined as the lowest set point of any pressure relief device on the tank system, minus 2 oz. For this Tank system the "trigger point" is 12 oz. When the "trigger point" is exceeded, a Site Investigation is required. The Site Investigation shall be conducted with an IR Camera and must be performed no later than the end of the calendar day following the measurement that exceeded the "trigger point". In the event that the Tank System requires 3 Site Investigations in a consecutive 30 day period, a VCS Root Cause Analysis must be performed within 90 days and identify appropriate response actions to be taken to address any common operation, maintenance or design cause identified, along with a proposed schedule for the implementation of those response actions.

EXCEEDANCE # 1	DATE: 4/7/22	DURATION: 7 minutes
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	YES	***If YES, explain the deviation.*** The thief hatch on Tank 3 was leaking.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	YES	***If YES, explain:*** When the operator arrived he did not find any mechanical malfunctions. He trended the tank levels and plunger data and noted that Miller 3-25H had just come back online after an extended shut in and when the plunger surfaced it brought 7 bbls of oil in a very short duration causing the tank pressure to exceed 12 oz.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	YES	***If YES, what actions were taken:*** The leaking thief hatch on Tank 3 was disassembled and the sealing surface was cleaned. It was reassembled and checked again and no leaks were found.
Was there a human action or inaction that contributed to the adverse event?	NO	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	NO	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	NO	***If YES, explain:***
EXCEEDANCE # 2	**4/11/2022**	**DURATION: 9 minutes**

Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The gas lift compressor was being serviced. The service tech blew down a scrubber vessel to the tanks at too high of a rate causing the tanks to overpressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**YES**	***If YES, explain how the actions contributed.*** The compressor service tech needs to slowly bleed pressures off of scrubber vessels to prevent overpressuring the tanks.
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The dump valve was leaking by.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 3	**4/29/2022**	**DURATION: 2 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**YES**	***If YES, explain the deviation.*** The thief hatches on Tanks 1, 2, 3, 4, 6, 7 and 8 were found to be leaking.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** During a restart of the gas lift compressor, the scrubber dump valve hung open causing the tanks to over pressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The thief hatches on Tanks 1, 2, 3, 4, 6, 7 and 8 were found to be leaking. All 7 of the hatches were removed and the the sealing surfaces were cleaned. The hatches were re-installed and checked again with no leaks present.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The scrubber dump valve hung open.
Was there a corrective action implemented?	**NO**	*If YES, explain:*
EXCEEDANCE # 4	**4/30/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** No mechanical issues were observed. When trending the wells and tank levels it was determined that the Miller 1-25H plunger arrived at 11:28 am and the Miller 2-25H arrived at 11:23 am. Tank 5 gained 3.55 bbls between 11:15 am and 11:30 am. The wells had been shut in for ~ 4 hours prior to the plunger runs. The pressure exceedance occurred at 11:28 am.

During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 5	**5/10/2022**	**DURATION: 5 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The gas lift compressor was being serviced. The service tech blew down a scrubber vessel to the tanks at too high of a rate causing the tanks to overpressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**YES**	***If YES, explain how the actions contributed.*** The compressor service tech needs to slowly bleed pressures off of scrubber vessels to prevent overpressuring the tanks.
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**YES**	***If YES, explain:*** Compressor rental company was asked to write an SOP on how to slowly bleed pressure from the vessels to prevent this from occurring.
EXCEEDANCE # 6	**5/29/2022**	**DURATION: 29 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The operator determined that the dump valve on the Heater Treater was hung open.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The dump valve on the Heater Treater was hung open.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 7	**5/30/2022**	**DURATION: 10 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***

Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The pneumatic control valve on the combustor was malfunctioning. It would open briefly and then close again.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The pneumatic control valve on the combuster was malfunctioning.
Was there a corrective action implemented?	**NO**	***If YES, explain:*** On 5/31/22 the pressure transmitter was relocated from less than 1 foot from the combustor valve to a location halfway between the combustor and tank battery. This was done to get more volume off of the vent line to keep the wastegate from cycling excessively.
EXCEEDANCE # 8	**6/1/2022**	**DURATION: 42 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The pneumatic control valve on the combustor was malfunctioning. It is not responding to pressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The pneumatic control valve on the combuster was malfunctioning.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** I&E Tech replaced the valve actuator. D91
EXCEEDANCE # 9	**6/8/2022**	**DURATION: 37 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The pneumatic control valve on the combustor was malfunctioning. It is not responding to pressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***

Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The pneumatic control valve on the combuster was malfunctioning.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 10	**6/17/2022**	**DURATION: 4 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The pneumatic control valve on the combustor was malfunctioning. It is not responding to pressure.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The pneumatic control valve on the combuster was malfunctioning.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** On 6/23/22, I&E Techs replaced the combustor controller and adjusted the opening and closing pressure settings. .

ATTACHMENT E - ROOT CAUSE ANALYSIS REPORT (PARAGRAPH 23)

ORGANIZATION	
AGENCY	Ohio EPA
PROGRAM/FACILITY	Ripley Tank Battery Vapor Control System (VCS)
REFERENCE NUMBERS	Facility ID: 0630005043 Permit Number: P0117672
REGION	EPA Region 5
DATE OF EVENT: 5/17/22 11:20 am	DATE RCA COMPLETED: 6/6/2022

EVENT DETAILS	
EVENT DESCRIPTION	LIST RCA TEAM MEMBERS
On the date of the event, the 3rd "trigger point" tank pressure exceedance in a consecutive 30 day calender period based on the tank pressure monitoring occurred. The "trigger point" for this VCS is 12 oz. The 1st exceedance occurred on 5/13/22 and the 2nd exceedance was on 5/15/22. For all 3 occurrences, a "Site Investigation" was conducted using an IR camera. For the 2nd exceedance, there were 2 tank hatches found to be leaking.	TEAM LEADER: Judson Shreves Andy Baker Jennifer Huffhines Jace Marshall

BACKGROUND SUMMARY

Answer these questions with a brief summary - attach supporting documents if available

Paragraph 23 (b) of the Consent Decree establishes the process to follow when pressure monitor measurement exceeds the "trigger point" at a Tank System. The "trigger point" is defined as the lowest set point of any pressure relief device on the tank system, minus 2 oz. For this Tank system the "trigger point" is 12 oz. When the "trigger point" is exceeded, a Site Investigation is required. The Site Investigation shall be conducted with an IR Camera and must be performed no later than the end of the calendar day following the measurement that exceeded the "trigger point". In the event that the Tank System requires 3 Site Investigations in a consecutive 30 day period, a VCS Root Cause Analysis must be performed within 90 days and identify appropriate response actions to be taken to address any common operation, maintenance or design cause identified, along with a proposed schedule for the implementation of those response actions.

EXCEEDANCE # 1	DATE: 5/13/22	DURATION: < 1 minute
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	NO	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	YES	***If YES, explain:*** When the operator arrived he found that the pad had shut in due to a power loss. The generator powering the site tripped a breaker. The combustor valve closed when the power was lost. This is a fail safe close valve.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	NO	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	NO	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	YES	***If YES, describe the equipment and how it appeared to contribute:*** The generator that powers the site had a tripped breaker.
Was there a corrective action implemented?	NO	***If YES, explain:***
EXCEEDANCE # 2	**5/15/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***

Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**YES**	***If YES, explain the deviation.*** During the site investigation, the thief hatches on Tank 6 and 8 were leaking.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** When the operator arrived to location he found the generator had shut down due to lost ECU communication. This caused power to the combustor to be lost and the valve closed.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** The operator disassembled the thief hatches on Tank 6 and 8 and cleaned the sealing surfaces.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The generator was down due to a fault.
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 3	**5/17/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** The water dump on the Ripley 1-26H appears to have partially hung open. The coriolis meter trend showed the water gravity dropping from 1.17 at 11:15 am to 0.78 at 11:30 am.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** The water dump valve hung open. It was checked by the operator and no issues were found.
Was there a corrective action implemented?	**NO**	*If YES, explain:*

ATTACHMENT F - ROOT CAUSE ANALYSIS REPORT (PARAGRAPH 23)

ORGANIZATION	
AGENCY	Ohio EPA
PROGRAM/FACILITY	Michael Tank Battery Vapor Control System (VCS)
REFERENCE NUMBERS	Facility ID: 0634005077 Permit Number: P0118324
REGION	EPA Region 5
DATE OF EVENT: 6/16/22 11:13 pm	DATE RCA COMPLETED: 6/30/2022

EVENT DETAILS	
EVENT DESCRIPTION	LIST RCA TEAM MEMBERS
On the date of the event, the 3rd "trigger point" tank pressure exceedance in a consecutive 30 day calender period based on the tank pressure monitoring occurred. The "trigger point" for this VCS is 12 oz. The 1st exceedance occurred on 6/8/22 and the 2nd exceedance was on 6/13/22. There were 4 additional exceedances between 6/17/22 and 6/21/22. For all 7 occurrences, a "Site Investigation" was conducted using an IR camera. For the first exceedance, the thief hatches on Tank 1 and 2 were fouind leaking. They were cleaned and rechecked on 6/13. No emissions were observed for all other exceedances	TEAM LEADER: Judson Shreves Andy Baker Jennifer Huffhines Jace Marshall Jarrod Miller

BACKGROUND SUMMARY

Answer these questions with a brief summary - attach supporting documents if available

Paragraph 23 (b) of the Consent Decree establishes the process to follow when pressure monitor measurement exceeds the "trigger point" at a Tank System. The "trigger point" is defined as the lowest set point of any pressure relief device on the tank system, minus 2 oz. For this Tank system the "trigger point" is 12 oz. When the "trigger point" is exceeded, a Site Investigation is required. The Site Investigation shall be conducted with an IR Camera and must be performed no later than the end of the calendar day following the measurement that exceeded the "trigger point". In the event that the Tank System requires 3 Site Investigations in a consecutive 30 day period, a VCS Root Cause Analysis must be performed within 90 days and identify appropriate response actions to be taken to address any common operation, maintenance or design cause identified, along with a proposed schedule for the implementation of those response actions.

EXCEEDANCE # 1	DATE: 6/8/22	DURATION: < 1 minute
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	YES	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	YES	***If YES, explain the deviation.*** The thief hatches on Tank 1 and Tank 2 were leaking. They were repaired and rechecked with an IR camera on 6/13/22.
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	YES	***If YES, explain:*** Plunger arrival at 2:26 am. Tank gained from 94.3" at 2:15 am to 95.7" at 2:30 am. It dropped to 95.2" at 2:45 am. This could have been caused by gas getting into the tank through the oil dump since the tank has solid downcomers.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	YES	***If YES, what actions were taken:*** The operator disassembled the thief hatches on Tank 1 and 2 and cleaned the sealing surfaces. He checked the LLC and separator level.
Was there a human action or inaction that contributed to the adverse event?	NO	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	NO	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	NO	***If YES, explain:***
EXCEEDANCE # 2	**6/13/2022**	**DURATION: < 1 minute**

Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** There were 2 exceedances on this day. At 17:24 there was a plunger arrival (126" in tank) about 15 min after pressure increase. Pressure increased 1 min after well opened. At 7:14 pm there was another plunger arrival (126" in tank, bobbles to 129" for 1 poll then back down. The increase followed by a decrease could have indicated gas in the oil line since there are solid downcomers in this tank. Pressure increased 1 minute after well opened and before arrival.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** Since the operator suspected gas got into the oil line he checked the dump valve for damage and found none. He adjusted the LLC to reset the level.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 3	**6/16/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** There were 2 exceedances on that day. At 9:09 pm there was a plunger arrival (tank went from 139.9" at 9 pm to 142.2" at 9:15 pm and then to 140.4" at 9:30 pm). The increase followed by a decrease could have indicated gas in the oil line since there are solid downcomers in this tank. There was another exceedance that coincided with plunger arrival at 11:13 pm. No tank gain noted this time.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** Since the operator suspected gas got into the oil line he checked the dump valve for damage and found none. He adjusted the LLC to reset the level. ***Note this investigation covered Exceedance 3 and 4 since they both occured during the night.***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 4	**6/17/2022**	**DURATION: < 3 minutes**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***

Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** There were 2 exceedances on this day. At 2:41 am Pressure increased 3 min before plunger ended cycle. Tank went from 140.6" at 2:30 am to 141.6" at 2:45 am. At 4:38 am the pressure increased 5 min after the plunger cycle ended and the well was shut in. Tank went from 140.8" at 4:30 am to 141.6" at 4:45 am. Since the gauge was lower at 4:30 am than it was at 2:30 am it was again suspected that gas was getting into the tank through the oil line.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** Since the operator suspected gas got into the oil line he checked the dump valve for damage and found none. He adjusted the LLC to reset the level. ***Note this investigation covered Exceedance 3 and 4 since they both occured during the night.***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 5	**6/18/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**NO**	***If YES, explain:*** Pressure increased 1 min after plunger arrival. Tank gained from 40.26" at 10:30 pm to 40.54" at 10:45 pm. It was noted that the 10:15 pm pool showed the tank slightly higher at 40.29. This fluctuation could just be a gauge issue but also could indicate gas getting into the tank from the oil dump line since there are solid downcomers in the tank.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**YES**	***If YES, what actions were taken:*** ince the operator suspected gas got into the oil line he checked the dump valve for damage and found none. He adjusted the LLC to reset the level.
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:*** T
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 6	**6/19/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***

Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** Pressure increased during the plunger arrival. Tank went from 40.8" at 12:45 am to 41.2" at 1 am. The operator checked the LLC and it was set properly.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**NO**	***If YES, describe the equipment and how it appeared to contribute:***
Was there a corrective action implemented?	**NO**	***If YES, explain:***
EXCEEDANCE # 7	**6/21/2022**	**DURATION: < 1 minute**
Was a Site Investigation completed no later than the end of the calendar day following the exceedance?	**YES**	***If NO, explain:***
Did the Site Investigation reveal any Reliable Information (observance or detection of VOC emissions from the tank system and assoicated piping)?	**NO**	***If YES, explain the deviation.***
Was the cause of the "trigger point" exceedance discovered during the Site Investigation?	**YES**	***If YES, explain:*** Operator arrived on location and did not find any malfunctioning equipment. While on site he witnessed a plunger run and noted that while the separator was dumping oil there was gas sweeping through.
During the Site Investigation, were there any operational or maintenance items discovered that warranted additional response actions?	**NO**	***If YES, what actions were taken:***
Was there a human action or inaction that contributed to the adverse event?	**NO**	***If YES, explain how the actions contributed.***
Was there a defect, malfunction, misuse of, or absence of equipment that contributed to this event?	**YES**	***If YES, describe the equipment and how it appeared to contribute:*** Operator adjusted the LLC to reset the level and also decreased the choke downstream of the dump. Trending back the past 2 weeks of history, there appears to be really large runs in terms of fluid volume evidenced both by larger than average tank gains and very slow plunger arrival speeds.
Was there a corrective action implemented?	**YES**	***If YES, explain:*** The choke downstream of the oil dump was decreased in size to control the rate of dump.

Attachment G - Combustor Downtime Events

Pad Name	Downtime Start Date	Downtime Start Time	Downtime Hours
BK Stephens Pad	06/24/2022	02:26 PM	6.37
BK Stephens Pad	01/24/2022	08:50 AM	5.25
BK Stephens Pad	06/27/2022	08:42 AM	3.53
BK Stephens Pad	02/06/2022	02:51 PM	2.00
BK Stephens Pad	01/14/2022	09:21 AM	1.50
BK Stephens Pad	03/29/2022	05:27 PM	1.22
BK Stephens Pad	06/23/2022	10:45 AM	0.68
BK Stephens Pad	02/07/2022	07:51 AM	0.50
BK Stephens Pad	02/22/2022	07:36 AM	0.25
BK Stephens Pad	01/25/2022	09:07 AM	0.23
BK Stephens Pad	06/16/2022	04:27 PM	60.93
BK Stephens Pad	02/02/2022	07:37 AM	41.47
BK Stephens Pad	02/05/2022	12:36 PM	24.50
BK Stephens Pad	03/28/2022	07:42 PM	13.52
Gustina-Bear Pad	06/16/2022	04:27 PM	4.02
Gustina-Bear Pad	06/01/2022	11:12 AM	1.52
Gustina-Bear Pad	05/24/2022	09:57 AM	1.02
Gustina-Bear Pad	06/17/2022	06:57 PM	0.50
Gustina-Bear Pad	03/19/2022	03:56 PM	0.28
Gustina-Bear Pad	04/21/2022	10:41 AM	0.28
Gustina-Bear Pad	02/19/2022	04:51 AM	0.27
Gustina-Bear Pad	03/06/2022	01:35 PM	0.27
Gustina-Bear Pad	03/07/2022	12:35 PM	0.27
Gustina-Bear Pad	03/19/2022	07:42 PM	0.27
Gustina-Bear Pad	04/15/2022	01:56 PM	0.27
Gustina-Bear Pad	01/05/2022	03:05 PM	0.25
Gustina-Bear Pad	02/03/2022	04:21 PM	0.25
Gustina-Bear Pad	02/16/2022	10:51 AM	0.25
Gustina-Bear Pad	02/17/2022	06:07 AM	0.25
Gustina-Bear Pad	02/22/2022	04:21 PM	0.25
Gustina-Bear Pad	03/07/2022	06:51 AM	0.25
Gustina-Bear Pad	03/13/2022	01:43 PM	0.25
Gustina-Bear Pad	03/19/2022	10:27 AM	0.25
Gustina-Bear Pad	03/25/2022	02:57 PM	0.25
Gustina-Bear Pad	05/20/2022	04:13 PM	0.25
Gustina-Bear Pad	05/29/2022	02:11 PM	0.25
Gustina-Bear Pad	06/09/2022	09:43 AM	0.25
Gustina-Bear Pad	06/23/2022	01:58 PM	0.25
Gustina-Bear Pad	01/05/2022	09:21 AM	0.23
Gustina-Bear Pad	02/23/2022	12:21 AM	0.23

Gustina-Bear Pad	03/31/2022	01:26 AM	0.23
Gustina-Bear Pad	03/31/2022	03:14 AM	0.23
Gustina-Bear Pad	03/31/2022	08:13 AM	0.23
Gustina-Bear Pad	04/14/2022	09:59 AM	0.23
Gustina-Bear Pad	02/03/2022	05:36 PM	22.23
Karen Pad	02/17/2022	03:51 PM	8.27
Karen Pad	06/15/2022	04:58 AM	6.78
Karen Pad	01/01/2022	12:36 PM	2.25
Karen Pad	02/03/2022	01:51 PM	1.00
Karen Pad	06/07/2022	12:19 PM	0.92
Karen Pad	04/04/2022	08:29 AM	0.73
Karen Pad	01/01/2022	09:36 AM	0.50
Karen Pad	02/21/2022	08:36 AM	0.50
Karen Pad	05/26/2022	10:43 AM	0.50
Karen Pad	01/31/2022	08:22 AM	0.25
Karen Pad	06/14/2022	12:14 AM	0.25
Karen Pad	06/27/2022	01:27 PM	0.23
Michael Pad	02/03/2022	04:21 PM	5.48
Michael Pad	03/09/2022	01:31 PM	5.15
Michael Pad	01/25/2022	12:20 PM	0.78
Michael Pad	01/18/2022	10:21 AM	0.73
Michael Pad	01/18/2022	01:51 PM	0.50
Michael Pad	02/22/2022	08:36 AM	0.50
Michael Pad	06/14/2022	09:27 AM	0.27
Michael Pad	05/23/2022	02:15 PM	0.22
Michael Pad	03/07/2022	02:06 PM	28.65
Michael Pad	02/04/2022	03:05 PM	33.77
Miller Pad	06/20/2022	08:28 AM	2.75
Miller Pad	01/13/2022	06:35 PM	2.02
Miller Pad	06/08/2022	10:01 AM	1.70
Miller Pad	06/24/2022	08:58 AM	1.48
Miller Pad	06/20/2022	01:15 AM	1.23
Miller Pad	03/24/2022	07:42 PM	0.52
Miller Pad	02/17/2022	09:06 AM	0.50
Miller Pad	06/14/2022	12:45 PM	0.50
Miller Pad	06/20/2022	05:28 AM	0.50
Miller Pad	04/07/2022	12:42 PM	0.48
Miller Pad	06/08/2022	06:44 AM	0.48
Miller Pad	06/20/2022	03:31 AM	0.45
Miller Pad	01/31/2022	02:21 PM	0.27
Miller Pad	02/07/2022	07:51 AM	0.25
Miller Pad	04/11/2022	04:13 AM	0.25

Miller Pad	06/14/2022	10:14 AM	0.25
Miller Pad	05/23/2022	11:00 AM	0.23
Miller Pad	06/20/2022	04:59 AM	0.23
Miller Pad	06/20/2022	04:14 AM	0.22
Milliken Pad	02/04/2022	01:50 PM	2.50
Milliken Pad	05/24/2022	07:25 AM	1.27
Milliken Pad	06/08/2022	09:42 AM	1.02
Milliken Pad	05/23/2022	01:28 PM	0.53
Milliken Pad	02/02/2022	08:50 AM	0.27
Milliken Pad	02/03/2022	04:21 PM	0.25
Milliken Pad	02/09/2022	07:51 AM	0.25
Milliken Pad	04/13/2022	07:55 AM	0.25
Milliken Pad	04/13/2022	03:42 PM	0.25
Milliken Pad	02/20/2022	09:21 AM	0.23
Milliken Pad	02/03/2022	05:35 PM	20.00
Puskarich Pad	05/08/2022	12:13 AM	2.50
Puskarich Pad	05/29/2022	11:11 PM	1.03
Puskarich Pad	05/25/2022	11:12 PM	1.00
Puskarich Pad	06/06/2022	11:13 PM	1.00
Puskarich Pad	05/19/2022	12:26 AM	0.55
Puskarich Pad	05/16/2022	02:44 AM	0.52
Puskarich Pad	02/16/2022	07:35 AM	0.50
Puskarich Pad	04/15/2022	12:12 PM	0.50
Puskarich Pad	04/18/2022	11:56 AM	0.50
Puskarich Pad	05/13/2022	11:28 AM	0.50
Puskarich Pad	05/20/2022	03:59 AM	0.50
Puskarich Pad	05/24/2022	12:42 PM	0.50
Puskarich Pad	06/02/2022	12:16 PM	0.50
Puskarich Pad	06/13/2022	10:28 AM	0.50
Puskarich Pad	06/21/2022	12:58 AM	0.50
Puskarich Pad	05/13/2022	09:46 AM	0.48
Puskarich Pad	06/15/2022	06:16 AM	0.48
Puskarich Pad	06/21/2022	10:02 AM	0.48
Puskarich Pad	06/07/2022	12:19 PM	0.43
Puskarich Pad	06/03/2022	03:29 PM	0.30
Puskarich Pad	06/14/2022	03:12 PM	0.30
Puskarich Pad	06/22/2022	01:57 AM	0.30
Puskarich Pad	04/27/2022	09:26 AM	0.28
Puskarich Pad	05/12/2022	10:43 PM	0.28
Puskarich Pad	06/08/2022	11:43 AM	0.28
Puskarich Pad	06/17/2022	07:59 AM	0.28
Puskarich Pad	06/18/2022	10:42 AM	0.28

Puskarich Pad	06/20/2022	07:59 AM	0.28
Puskarich Pad	06/20/2022	09:28 AM	0.28
Puskarich Pad	06/22/2022	12:57 AM	0.28
Puskarich Pad	02/06/2022	04:06 PM	0.27
Puskarich Pad	02/19/2022	04:21 AM	0.27
Puskarich Pad	03/31/2022	01:26 PM	0.27
Puskarich Pad	04/20/2022	07:13 AM	0.27
Puskarich Pad	04/20/2022	07:43 AM	0.27
Puskarich Pad	04/21/2022	09:56 AM	0.27
Puskarich Pad	04/23/2022	07:12 AM	0.27
Puskarich Pad	04/24/2022	06:13 AM	0.27
Puskarich Pad	04/25/2022	02:45 AM	0.27
Puskarich Pad	05/01/2022	12:27 PM	0.27
Puskarich Pad	05/03/2022	04:11 PM	0.27
Puskarich Pad	05/03/2022	10:56 PM	0.27
Puskarich Pad	05/09/2022	05:13 PM	0.27
Puskarich Pad	05/11/2022	07:42 AM	0.27
Puskarich Pad	05/15/2022	02:27 AM	0.27
Puskarich Pad	05/17/2022	12:42 PM	0.27
Puskarich Pad	05/19/2022	01:56 AM	0.27
Puskarich Pad	05/25/2022	11:42 AM	0.27
Puskarich Pad	05/31/2022	05:27 AM	0.27
Puskarich Pad	06/16/2022	02:28 AM	0.27
Puskarich Pad	01/05/2022	07:05 PM	0.25
Puskarich Pad	01/19/2022	06:36 AM	0.25
Puskarich Pad	02/02/2022	12:36 PM	0.25
Puskarich Pad	02/05/2022	09:51 PM	0.25
Puskarich Pad	02/07/2022	06:51 AM	0.25
Puskarich Pad	02/08/2022	12:51 PM	0.25
Puskarich Pad	02/09/2022	05:51 PM	0.25
Puskarich Pad	02/11/2022	12:51 PM	0.25
Puskarich Pad	02/14/2022	10:06 AM	0.25
Puskarich Pad	02/14/2022	12:36 PM	0.25
Puskarich Pad	02/19/2022	07:51 AM	0.25
Puskarich Pad	02/19/2022	08:36 AM	0.25
Puskarich Pad	03/06/2022	12:06 PM	0.25
Puskarich Pad	03/07/2022	03:51 PM	0.25
Puskarich Pad	03/31/2022	05:27 AM	0.25
Puskarich Pad	04/11/2022	07:59 AM	0.25
Puskarich Pad	04/13/2022	12:42 AM	0.25
Puskarich Pad	04/14/2022	04:43 AM	0.25
Puskarich Pad	04/16/2022	04:26 PM	0.25

Puskarich Pad	04/23/2022	02:29 PM	0.25
Puskarich Pad	04/24/2022	06:44 AM	0.25
Puskarich Pad	04/25/2022	03:28 AM	0.25
Puskarich Pad	04/25/2022	10:14 AM	0.25
Puskarich Pad	04/30/2022	07:43 AM	0.25
Puskarich Pad	05/05/2022	09:43 AM	0.25
Puskarich Pad	05/05/2022	06:56 PM	0.25
Puskarich Pad	05/09/2022	06:13 AM	0.25
Puskarich Pad	05/11/2022	12:13 PM	0.25
Puskarich Pad	05/12/2022	01:13 AM	0.25
Puskarich Pad	05/22/2022	06:14 PM	0.25
Puskarich Pad	05/24/2022	06:12 PM	0.25
Puskarich Pad	05/25/2022	08:57 AM	0.25
Puskarich Pad	06/05/2022	04:28 PM	0.25
Puskarich Pad	06/06/2022	10:58 AM	0.25
Puskarich Pad	06/07/2022	09:58 AM	0.25
Puskarich Pad	06/07/2022	11:14 AM	0.25
Puskarich Pad	06/09/2022	12:59 PM	0.25
Puskarich Pad	06/10/2022	08:43 AM	0.25
Puskarich Pad	06/10/2022	07:13 PM	0.25
Puskarich Pad	06/13/2022	04:13 AM	0.25
Puskarich Pad	06/16/2022	01:44 PM	0.25
Puskarich Pad	01/05/2022	01:21 PM	0.23
Puskarich Pad	02/06/2022	01:06 AM	0.23
Puskarich Pad	02/06/2022	07:37 AM	0.23
Puskarich Pad	02/08/2022	01:22 PM	0.23
Puskarich Pad	02/16/2022	01:07 PM	0.23
Puskarich Pad	03/07/2022	03:22 PM	0.23
Puskarich Pad	04/13/2022	10:13 AM	0.23
Puskarich Pad	04/15/2022	07:43 AM	0.23
Puskarich Pad	04/18/2022	11:12 AM	0.23
Puskarich Pad	04/21/2022	01:13 AM	0.23
Puskarich Pad	05/09/2022	03:58 AM	0.23
Puskarich Pad	05/09/2022	08:29 AM	0.23
Puskarich Pad	05/11/2022	09:43 PM	0.23
Puskarich Pad	05/13/2022	07:44 AM	0.23
Puskarich Pad	05/16/2022	04:43 AM	0.23
Puskarich Pad	05/25/2022	06:28 AM	0.23
Puskarich Pad	05/28/2022	10:42 PM	0.23
Puskarich Pad	06/03/2022	10:29 PM	0.23
Puskarich Pad	06/06/2022	08:29 AM	0.23
Puskarich Pad	06/06/2022	03:44 PM	0.23

Puskarich Pad	06/09/2022	08:29 AM	0.23
Puskarich Pad	06/12/2022	12:13 AM	0.23
Puskarich Pad	06/12/2022	05:43 AM	0.23
Puskarich Pad	06/12/2022	08:57 AM	0.23
Puskarich Pad	06/16/2022	10:00 AM	0.23
Puskarich Pad	04/14/2022	09:14 AM	0.22
Puskarich Pad	04/22/2022	03:59 AM	0.22
Puskarich Pad	05/08/2022	04:59 PM	0.22
Puskarich Pad	05/15/2022	06:59 AM	0.22
Puskarich Pad	06/06/2022	04:15 PM	0.22
Puskarich Pad	06/14/2022	02:46 AM	0.22
Ripley Pad	05/13/2022	12:57 AM	9.52
Ripley Pad	01/10/2022	05:06 PM	9.25
Ripley Pad	05/15/2022	02:27 AM	1.53
Ripley Pad	02/11/2022	08:52 AM	1.50
Ripley Pad	05/18/2022	06:28 AM	1.25
Ripley Pad	05/23/2022	07:44 AM	1.25
Ripley Pad	05/18/2022	03:59 AM	0.98
Ripley Pad	02/17/2022	07:51 AM	0.75
Ripley Pad	01/11/2022	04:36 AM	0.50
Ripley Pad	02/03/2022	07:21 AM	0.50
Ripley Pad	06/08/2022	08:27 AM	0.28
Ripley Pad	01/10/2022	03:21 PM	0.25
Ripley Pad	01/11/2022	03:37 AM	0.25
Ripley Pad	01/28/2022	01:51 PM	0.25
Ripley Pad	03/22/2022	02:43 PM	0.25
Ripley Pad	04/07/2022	07:58 AM	0.25
Ripley Pad	05/07/2022	12:28 PM	0.25
Ripley Pad	05/07/2022	01:59 PM	0.25
Ripley Pad	06/14/2022	03:44 AM	0.25
Ryser Pad	02/04/2022	01:05 PM	4.75
Ryser Pad	05/07/2022	01:13 AM	4.75
Ryser Pad	03/05/2022	02:06 PM	3.00
Ryser Pad	02/03/2022	04:36 PM	2.75
Ryser Pad	05/07/2022	06:27 AM	2.75
Ryser Pad	02/17/2022	09:06 AM	2.00
Ryser Pad	03/03/2022	10:05 PM	1.00
Ryser Pad	06/07/2022	07:43 PM	0.58
Ryser Pad	05/25/2022	09:42 AM	0.50
Ryser Pad	02/21/2022	10:23 AM	0.48
Ryser Pad	06/14/2022	12:14 AM	0.47
Ryser Pad	02/09/2022	07:51 AM	0.25

Ryser Pad	04/18/2022	10:26 AM	0.25
Ryser Pad	06/16/2022	04:43 PM	0.25
Ryser Pad	06/09/2022	08:29 AM	0.23
Stout Pad	01/22/2022	08:37 PM	5.98
Stout Pad	02/03/2022	04:21 PM	4.27
Stout Pad	01/24/2022	09:06 AM	2.98
Stout Pad	06/17/2022	04:57 PM	2.75
Stout Pad	05/03/2022	04:11 PM	2.52
Stout Pad	02/05/2022	12:35 PM	2.00
Stout Pad	06/26/2022	04:00 AM	0.50
Stout Pad	06/24/2022	08:01 PM	0.48
Stout Pad	06/25/2022	10:46 AM	0.47
Stout Pad	06/20/2022	06:57 AM	0.30
Stout Pad	06/09/2022	10:26 PM	0.28
Stout Pad	06/21/2022	11:58 AM	0.28
Stout Pad	06/30/2022	03:56 AM	0.28
Stout Pad	06/10/2022	12:57 AM	0.27
Stout Pad	06/11/2022	07:11 PM	0.27
Stout Pad	06/12/2022	07:11 AM	0.27
Stout Pad	06/16/2022	05:57 AM	0.27
Stout Pad	06/24/2022	09:27 AM	0.27
Stout Pad	06/25/2022	10:56 PM	0.27
Stout Pad	06/26/2022	03:42 PM	0.27
Stout Pad	06/28/2022	04:42 PM	0.27
Stout Pad	06/29/2022	02:41 PM	0.27
Stout Pad	01/05/2022	02:35 AM	0.25
Stout Pad	02/22/2022	09:36 AM	0.25
Stout Pad	05/24/2022	08:57 AM	0.25
Stout Pad	06/10/2022	08:58 PM	0.25
Stout Pad	06/11/2022	05:26 PM	0.25
Stout Pad	06/13/2022	03:42 AM	0.25
Stout Pad	06/16/2022	04:12 PM	0.25
Stout Pad	06/19/2022	10:42 PM	0.25
Stout Pad	06/24/2022	05:28 AM	0.25
Stout Pad	06/26/2022	05:41 PM	0.25
Stout Pad	06/28/2022	08:41 PM	0.25
Stout Pad	04/12/2022	07:43 AM	0.23
Stout Pad	06/09/2022	08:44 PM	0.23
Stout Pad	06/11/2022	02:27 AM	0.23
Stout Pad	06/20/2022	08:14 AM	0.23
Stout Pad	06/26/2022	09:57 PM	0.23
Stout Pad	06/29/2022	02:13 PM	0.20

Stout Pad	03/07/2022	02:06 PM	25.37
Vozar Pad	05/12/2022	07:29 PM	6.47
Vozar Pad	04/28/2022	12:13 PM	1.73
Vozar Pad	02/16/2022	08:51 AM	1.25
Vozar Pad	05/25/2022	07:27 AM	0.75
Vozar Pad	02/08/2022	11:51 AM	0.27
Vozar Pad	03/11/2022	10:41 AM	0.27
Vozar Pad	02/05/2022	11:36 AM	0.25
Vozar Pad	04/01/2022	12:43 PM	0.25
Vozar Pad	04/06/2022	12:27 PM	0.25
Vozar Pad	05/01/2022	11:13 AM	0.25
Vozar Pad	03/29/2022	10:28 AM	0.23
Vozar Pad	05/13/2022	02:44 AM	0.23
Vozar Pad	05/18/2022	11:29 AM	0.22