October 23, 2018

Alexis Strauss
U.S. EPA, Region 9
NPDES/DMR, ENF-4-1
75 Hawthorne Street
San Francisco, CA 94105-3901

**Re: Discharge Monitoring Report – Third Quarter 2018**
**Platforms Ellen, Elly, and Eureka NPDES Permit CAG280000**

Dear Ms. Strauss:

This letter and its attachments include Discharge Monitoring Reports (DMRs) for the reporting period of July, August, and September 2018 for Beta Offshore Platforms Ellen, Elly and Eureka.

All produced fluids from Platform Eureka are piped to Platform Elly for processing. Platforms Elly and Ellen are two separate platforms attached by a bridge, thus they have the same latitude and longitude listed in their DMRs. We have submitted separate DMRs for each of the three platforms since there are separate NPDES discharges associated with each platform. Oil production wells are located at Platforms Ellen and Eureka. Platform Elly serves as a processing facility and contains most of the production treatment processes. This is the only platform that may occasionally discharge produced water. There are no drilling related activities or wells on Platform Elly. Production fluids generated at Ellen and Eureka are sent to Elly for further processing and back to Ellen for injection.

Attachment 1: is comprised of this cover letter.

Attachment 2: Listings of the chemical inventory for miscellaneous discharges (specifically non-contact cooling water) for each platform.

Attachment 3: Provides pre-dilution and post dilution chlorine results for non-contact cooling water discharges in accordance with Appendix C of the permit for each platform.

Attachment 4: Summarizes discharges that are prohibited.

Attachment 5: Includes copies of the official state certified lab reports and laboratory quality control reports and other permit required information (EPA Methods, sample dates, etc.) for each Platform.

## Discharge Overview

Drilling Muds and Cuttings (001):

There were no drilling activities during this quarter at all three platforms.

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Produced Water (002):
Produced water dilution – Platform Elly: On rare occasions when produced water is discharged, the discharge typically only occurs for a few hours or less. When calculating the dilution for discharges that occurred for the quarter, we use the average produced water daily rate based on the actual barrels of water per day "rate". As an example, if 100 barrels were discharged in one hour, the actual rate would extrapolate to a 2400 barrels of water per day (BWD) "rate", instead of only 100 BWD. This better represents the flow velocity used in the EPA Plume dilution calculation.

There were two days of discharge on July 12 and July 29. Each lasted less than 1 hour. Oil and grease samples were taken and results are included in the DMR.

Annual cumulative totals listed in the DMR include volumes from March 2018 through February 2019.

Well Treatment Completion and Workover Fluids (003):
WTCWF generated from Platform Ellen or Eureka would be commingled with the produced water at Platform Ellen. Two well completion jobs were performed in September on Platform Ellen. Two well completion jobs were performed in August on Platform Eureka. There were no discharges of fluids. Chemical inventories are available on request.

Deck Drains (004):
Platform Ellen and Elly deck drains are commingled with production fluids and are processed at Platform Elly. Water segregated from the process is re-injected at Platform Ellen. Refer to Produced Water monitoring requirements in the DMR if discharged. Deck drain fluids on Platform Eureka are sent to a disposal well on Eureka and not discharged.

Sanitary and Domestic Waste (005):
Platforms Ellen and Eureka both operate a United States Coast Guard approved Marine Sanitation Device (MSD). Although these devices are capable of treating both sanitary and domestic waste, some of the domestic waste (as laundry water) is not discharged. At Platform Ellen, these domestic volumes are commingled with production fluids, sent to Platform Elly for processing, and returned to Platform Ellen for injection with produced water (refer to Produced Water DMR if discharged). The sanitary waste commingles with sink and shower water and is properly treated and chlorinated through the MSD, then discharged at Platform Ellen.

Platform Eureka also has sanitary and domestic waste water discharges (refer to the DMR). Domestic waste water (as laundry water) is sent to a disposal well and not discharged at Eureka. Sanitary wastes are treated through a USCG-approved MSD and discharged at Eureka. There are no sanitary/domestic waste discharges at Platform Elly.

The required annual Marine Sanitation Device (MSD) inspections were completed on July 31, 2018. The inspections included a chlorine test to ensure proper operation of the device and chlorine results are included in the DMR. The MSDs were in good condition and operating properly. Full inspection reports are available upon request.

Fire water (008):
Fire water at Platforms Ellen and Elly is commingled with deck drains and injected with produced water at Platform Ellen. Small amounts may be discharged overboard during fire water system testing at Platform Elly. The fire water and deck drain volumes at Platform Eureka are sent to a disposal well and are not discharged (refer to Produced Water DMR if discharged). The fire water was reported as not being chlorinated at all three platforms.

Non-contact Cooling Water (009) - Combined with Excess Sea Water:
Non-contact cooling water (as sea water) may be discharged at all three platforms. Separate discharges occur through separate outfalls for each of the three platforms. Seawater pumps deliver water throughout the platforms for use as non-contact cooling water, marine sanitation device feed water and for sanitary usage supply. Any excess seawater not used for these sources has been previously reported under uncontaminated water in the DMRs under a separate discharge (016). When the non-contact cooling water is discharged it can be combined with the excess seawater discharges at Eureka and Ellen. Since the platforms add low dosages of chlorine treatment to this part of the system, chlorine monitoring has been performed on the chlorinated discharges and if applicable, includes excess seawater in addition to the non-contact cooling water. Thus, the DMR reports the total water discharged for both sources (non-contact cooling water and excess seawater). Both volumes and chlorine results for the combined discharges are listed in the DMR under non-contact cooling water for Eureka and Ellen. Elly has only non-contact cooling water. Any separate uncontaminated discharges that occur, will continue to be reported independently under discharge (016) in the DMR.

EPA-approved chlorine samples were taken during the quarter at each of the platforms. The results are included in the DMR.

The chemical inventory for non-contact cooling water (Attachment 2) was based on Operations' daily estimates using a Hach color wheel chlorine test kit.

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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. See 18 U.S.C & 1001 and 33 U.S.C. & 1319. (Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months and 5 years)

Should you have any questions or require any additional information, please contact me at (562) 628-1526.

Sincerely,

Diana Lang

Diana Lang
HSE Manager

cc (via email):

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