1. Provide the name, title, email, phone number and mailing address for the person to whom correspondence should be sent regarding the incident.

Name: Brandon B Matherne, VP-Engineering
Address: Clovelly Oil Co. LLC
650 Poydras St., Suite 2350
New Orleans, LA 70130
Phone: 504-522-7496

2. Who owns and/or operates the location where the incident occurred?

Clovelly Oil Co. LLC is a working interest owner and is operator of this location.

Other working interest owners
Lake Petroleum Inc.
Ardenco, LLC
Greyhound Investments, LLC
Wright Mineral Interests, LLC

3. Briefly describe the facility, e.g. discuss what activities take place on-site and what substances are produced, processed, handled or stored on-site. If the facility is an oil and gas production or storage site then answer the following questions:

- Briefly describe the facility.
  - The West Lake Pontchartrain East Block 41 Oil and Gas Production Facility (the "Platform") is located in Lake Pontchartrain about 1-1/4 miles north of Kenner, Louisiana city limits. It processes oil, gas and produced water from three oil wells and one gas well located near (but at different distances from) the Platform. Production from those wells are transported to the Platform via four-inch flowlines. The Platform consists of process separators, treaters, tanks, pumps, measurement equipment, a gas compressor, pollution containment systems and oil, water & ballast storage compartments located in the hull of the concrete Platform. Some of the storage compartments hold the produced oil until it is periodically sold and transported from the site by an oil transport barge. Produced water is injected into an on-lease salt water disposal well. Produced natural gas flows to a 6" pipeline for sale and transportation to shore. The Platform was manned and contained personnel quarters and utilities to support a manned operation.

- Is there an API number or numbers associated with the facility? Please provide.
  - No.

- Does the facility have a Facility Response Plan?
  - Yes. Clovelly maintains an Integrated Contingency Plan, which includes the following components:
    - EPA SPCC Plan
    - LADEQ Spill Prevention and Control Plan
    - EPA Facility Response Plan
    - USCG Facility Response Plan
    - USCG Operations Manual for Oil Transfer

- List all storage tanks, production or otherwise, identify the capacities, contents and volumes of materials on the date of the incident.

  - The concrete Platform contains (8) integral concrete storage compartments within the lower hull, and two (2) 400 bbl welded steel tanks. The two (2) 400 bbl welded steel tanks are listed as "storage" tanks however, their actual purpose is process rather than storage. The compartment names, tank names and capacities are listed below.

Number	Type	Material Contained	Qty Stored, BBLS, at Time of Accident	Max. Capacity, BBLS
A-1 (P-2)	Hull Compartment	Water/Oil	~43 water & trace oil	952
A-2 (S-2)	Hull Compartment	Water/Oil	~520 water & trace oil	952
A-3 (P-3)	Hull Compartment	Water/Oil	~22 water & trace oil	478
A-4 (S-3)	Hull Compartment	Water/Oil	~22 water & trace oil	478
A-5	Steel Welded Test Tank	Oil/Water	~33 water / ~32 oil	400
A-6	Steel Welded SW Tank	Water	~200 water/trace oil	400
P-1	Hull Compartment	Water/Oil	~30 water & trace oil	660
S-1	Hull Compartment	Water/Oil	~30 water & trace oil	660
P-4	Hull Compartment	Water/Oil	~30 water & trace oil	658
S-4	Hull Compartment	Water/Oil	~520 oil & trace water	952

4. What process units or equipment were involved in the event?

The following Clovelly operated equipment was involved during the operation immediately preceding the event:

- One, buried four-inch flowline from the SL 5568 Well No. 1 Well (Serial No._137574) incoming from the remote well location, through a valve header and piping system to the Test Tank (described below) located on the top deck of the Platform. The approximate length of the buried four-inch flow line from the well to the Test Tank was 2675 feet.
- Test Tank, a 400 bbl capacity welded tank, located on the top deck of the Platform

All other equipment on the Platform was shut-in for this activity, except for a natural gas engine powered generator, which supplied electricity for the quarters and facility lighting.

Other equipment was provided by Global Oil Management Group, Ltd./Global Oil EOR Systems, Ltd./BTB Refining, LLC ("BTB"), a third-party contractor that was cleaning the flowlines (please see the materials provided by BTB to Clovelly regarding its flowline cleaning process attached hereto as **Exhibit A and Exhibit B**).

Provide a brief description and process flow diagram for the processes involved.

- The only active process at the time of the event was a flowline steam cleaning operation to remove accumulated paraffin from the SL #5568 #1well's flowline with the inlet of the flowline located about 1/2 mile from the Platform and the outlet located at the Test Tank.
- A chemical compound, consisting in part, of hydrogen peroxide, which produced steam and pressure, was injected into the four-inch flowline at the SL 5568 #1 well site (wellbore was shut-in and secured) where it flowed directly to the Platform and into the Test Tank. The steam melted the paraffin and the pressure (as supplemented by the steam generator) pushed the effluent through the flowline into the Test Tank.
- See the attached flow diagram for the flowline cleaning operation, see **Exhibit C**.
- This process was being performed by BTB.

5. At the time of the incident, was the facility operating under a Title V Air Permit?

No

6. What are the SIC and NAICS code for the facility where the event occurred?

SIC code: 211111
NAICS code: 211

7. Did the event take place at a Risk Management Program covered process? Are there any Risk Management Program covered processes at the facility?

The event did not take place during a risk management program covered process.

8. Provide a detailed description and timeline of the event. Include the best known start time and duration of the incident and the timeline for any emergency response.

- Description of the event:
  - On October 15, 2017 at approximately, 7:00 pm, BTB was injecting its chemical compound into the four-inch flowline at the SL #5568 #1 well site, which was received at the production facility in the 400 bbl welded steel Test Tank located on the top deck of the concrete Platform.

- At about 7:18 pm, an explosion occurred in or around the Test Tank. This event is still being investigated.
- A general fire occurred throughout 80% of the top deck area of the Platform, and a smaller localized fire occurred on the lower deck of the Platform, immediately after the explosion.
- The Platform was heavily damaged. A complete assessment of the damage has not been performed
- There was no water borne pollution from this event except for a small amount of solid paraffin beads recovered from a 200-yard-long section of the south lake shore near Kenner, LA. All of the paraffin beads were removed and properly disposed.

- Timeline of the event: See above. Further details of this event, including accurate timeline information, is still being determined and is being delayed by the injured status of on-site personnel.

9. What specific substances were released to any media during the event? Please include the estimated or known amounts of each substance? Include all air contaminants that were released during the event, even those materials with release amounts below the reportable quantity.

Specific substances released were as follows:

Substance	**Estimated Amount**	**Status - Released**
Crude Oil (includes Paraffin Wax)**	~ 32 barrels	Burned off
Natural Gas	Unknown amount at this time	Burned off
Produced saltwater	~ 71 barrels	Drained overboard in Lake Pontchartrain
Xylene**	~ 2-55 gallon drums	Burned off
Corrosion Inhibitor**	~ 4-55 gallon drums	Burned off
Scale Inhibitor**	~ 1-55 gallon drum	Burned off
Paraffin Solvent**	~ 1-55 gallon drum	Burned off
Glycol/antifreeze**	~ 1–55 gallon drum	Burned off
Motor Oil**	~ 260 gallons in SS Tote & Drum	Burned off
Diesel Fuel**	~ 530 gallons in SS Tote	Burned off
BTB Compound***	Unknown	Unknown

****MSDS sheets can be supplied for the above substances if needed.**

*****BTB should supply MSDS sheets for its compound(s) used to clean the flowlines.**

10. Have there been any investigations or audits of the event? Are investigations or audits pending? Who performed the investigations or audits? Provide a copy of any reports, audits, or any other analysis, including any drafts, describing the causes or consequences of the event, including all preliminary draft reports or analysis and/or draft audit results.

In addition to local, state, and federal agencies, (see answer to question 21 below), we believe there are investigations pending by several independent entities, including but not limited to, those representing Clovelly.

11. What is the initial best-known cause or root cause of the event? Were there any additional contributing factors that you are aware of?

The cause or root cause of the incident is currently unknown and remains under investigation.

12. What measures have been taken to address the findings, conclusions or recommendations of the investigations or audits?

Once the cause of the incident is determined, appropriate procedures/measures will be put in place to prevent a reoccurrence.

13. Are there any findings, conclusions, or recommendations that have not been addressed fully, and if so, what measures remain to be taken, and what is the expected timeline for implementing those measures?

At this time, the incident is under investigation. When completed, findings, conclusions and/or recommendations may be shared and/or discussed.

14. Were there any fatalities or injuries attributed to the event? If yes, explain.

A representative/employee of BTB was killed.
Three employees of Clovelly were burned, varying in degrees from minor to critical.
Clovelly believes that one employee of Crosby Energy Services, who was contracted to Clovelly at the time of the incident, suffered minor burns and other injuries.
Clovelly also believes that two employees of Select Oilfield Services, LLC suffered minor burns and other injuries. In addition, Clovelly believes a third employee of Select Oilfield Services, LLC suffered broken bones, other injuries and burns.

15. Did you, or anyone else, issue any evacuation, road closure, or shelter-in-place orders as a result of the event for your facility or surrounding community? If yes, explain.

The facility was evacuated due to the incident. There were no known road closures or shelter-in-place orders of the surrounding community.

16. Was there any property or equipment damage, either on-site or off-site, that resulted from the event? If yes, explain what was damaged and the extent of damages.

There was no damage off-site. There was damage at the Platform. The extent of such damage is still being assessed at this time.

17. What emergency response measures were taken, by you or anyone else, to stop and/or to minimize hazards from the event?

- Witt-O'Brien's Emergency Response Team was called out to direct emergency actions.
- Oil Mop, Inc. personnel self-activated and were called out to set oil containment boom around the Platform and to recover any pollution that would have occurred.
- The only well flowing into the Platform at the time of the incident was a natural gas well, which was shut-in (closed off) shortly after the incident.
- The gas sales pipeline valve located 1.6 miles WNW of the Platform was closed to prevent gas back-feeding the fire.
- The onboard gas block valve on the gas sales pipeline was closed to eliminate gas leaks within the Platform piping once it was safe to board the structure.
- An inspection of the damaged Platform and its systems was conducted by an experienced engineer to identify any remaining hazards.
- Produced water located in the 400 bbl welded, steel produced water tank and all remaining vessel liquids were drained from production equipment to eliminate the possibility of leakage.
- The sump and drain piping system was repaired and restored to provide containment of any hydrocarbons remaining on the top deck of the Platform.
- Warning signs were installed on the Platform, perimeter and handrails were barricaded with chains, and warning signs to discourage unauthorized and untrained personnel from boarding the Platform were also installed.
- Navigation lights were installed on the damaged Platform for collision avoidance since the damaged Platform was out of service as a result of the incident.
- Lower hull storage compartment thief hatches were locked in closed position.

18. Did you or anyone else the facility perform any air monitoring during or after the event, including any routine monitoring? If so, then please provide a summary of the results.

Clovelly, via Witt-O'Brien, arranged for air monitoring by the Center for Toxicology and Environmental Health. Their report can be submitted if requested, however an excerpt is quoted below:

> CTEH® provided real-time air monitoring, analytical air sampling, and toxicology support on behalf of OMI Environmental Solutions following a natural gas platform fire that occurred on Lake Pontchartrain near Kenner, Louisiana. A review of the Community real-time air monitoring data reported no detections of benzene, CO, H2S, %LEL, methane, NO2, and VOCs. Particulate matter (PM2.5) and O2 concentrations were observed within normal ambient conditions.

Analytical air samples collected did not detect any constituents at concentrations exceeding screening levels protective of the general public."

19. Identify and provide copies of any industry standards, internal standards, SOPs, or manufacturer's recommendations related to the incident including equipment, process units, and personnel activities involved in the incident, including line cleaning.

Pending thorough review and investigation. However, please see **Exhibit A and Exhibit B**, attached, explaining BTB's paraffin cleaning process and patent of process.

20. Please provide any documents associated with the identification of hazards at your facility related to the incident. Provide a copy of any Standard Operating Procedure for Hot Work including any procedures for monitoring for explosive atmosphere.

Pending thorough review and investigation.

21. Has any local, state, or federal agency conducted an investigation or requested information regarding the event? If so, please provide the name and contact information for each agency person who conducted an inspection or requested information.

The following agencies are believed to have begun an investigation of this event:

- Jefferson Parish Sheriff's Office
  - Sherriff Joe LaPinto
  - 504-363-5500
  - 1233 West Bank Expressway
  - Harvey, Louisiana

- Jefferson Parish Fire Department
  - Chief Dave Tibbetts
  - 504-736-6200
  - 834 S. Clearview Pkwy
  - Jefferson, Louisiana 70123

- OSHA
  - Chris Herrington
  - 225-298-5458, ext. 108
  - United States Department of Labor
  - Occupational Safety and Health Administration
  - 9100 Bluebonnet Centre Boulevard, Suite 201
  - Baton Rouge, LA 70809

22. Was any work or maintenance occurring at the facility at the time of the incident? If so, then please describe the nature of the work and who was conducting it? Were there contractors at the facility at the time of the incident? If so then please identify them and provide a summary of why they were at the facility at the time of the incident.

- Maintenance work was being conducted at the time of the event. A third-party contractor, BTB, was engaged to clean paraffin accumulations in three oil flowlines servicing three separate oil wells operated by Clovelly. The lines required periodic cleaning. The first two flowlines were cleaned without incident. During the cleanout of the third flowline, the incident occurred.

  At the time of the incident, Tim Morrison, a representative/employee of BTB, the contractor responsible for the cleanout operation, was located on-site (on the Platform). Several contract employees were located off site (on a remote barge from which its chemical compound was injected into the flowline at the well head) and were also engaged in the cleanout work. In addition, Lime Instruments, LLC may have had equipment and/or an employee present on the remote barge working with BTB as part of the cleanout operation.

23. Please identify by name, title, and employer every person at the facility at the time of the incident.

The following persons were located on the Platform at the time of the incident:

Person's Name	Title	Employer
James C Bordelon, Jr.	**Production Superintendent**	**Clovelly Oil Co. LLC**
Lawrence T. ("LT") Dufrene	**Production Foreman**	**Clovelly Oil Co. LLC**
Paul A Pfister	**Production Foreman**	**Clovelly Oil Co. LLC**
Davin Billiot	**Contract Operator**	**Crosby Energy Services**
Al Kimbrel	**Third Party Contractor**	**Select Oilfield Services, LLC**
Brent Neil	**Third Party Contractor**	**Select Oilfield Services, LLC**
Cody Bodreaux	**Third Party Contractor**	**Select Oilfield Services, LLC**
Timmy L Morrison	**Third Party Contractor**	**Global Oil Management Group, Ltd. / Global Oil EOR Systems, Ltd / BTB Refining LLC**

If you plan to claim any information as confidential business information, please call me so that we can discuss options prior to your sending - DO NOT EMAIL. If you have any questions, please feel free to contact me at the email/phone listed below. Please provide the above requested information by COB Friday, November 3, 2017.4852-6521-6340, v. 1