

**Hebron**  
**ExxonMobil Canada Properties**  
20 Hebron Way  
St. John's, Newfoundland  
A1A 0L9



September 20, 2022

File Code: 11.4A.2

Mr. Paul Alexander  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
240 Waterford Bridge Road  
The Tower Corporate Campus – West Campus Hall  
Suite 7100  
St. John's, NL  
A1E 1E2

Attention: Mr. Paul Alexander

**Subject: Lifeboat Launching Drill – Alternative Arrangements**

Dear Mr. Alexander:

ExxonMobil Canada Properties would like to submit the following proposal in regards to the lifeboat launching drills as required in the Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations that came into force on January 1, 2022.

Section 30 (3) of the OSH Regulations states that every employer must ensure that *“If compliance with subparagraph (2)(d)(ii) is not feasible, the employer must ensure that additional inspections and testing of all components that would otherwise be tested by the launching drill are carried out in consultation with the lifeboat manufacturer and with the prior approval of the Chief Safety Officer.”* Hebron submitted RQF-HEB-085 in July 2017 outlining our Lifeboat Fall Wire Maintenance and On-Davit Maintenance in Lieu of Deployment Performance Testing and this letter will replace this RQ. This letter addresses the on-davit maintenance in lieu of deployment performance testing portion of the RQF.

**Proposal**

As is consistent with the current practices of other East Coast Installations, as well as international practice, ExxonMobil proposes the implementation of an on-davit inspection, testing, and maintenance program for all Hebron lifeboats and ancillary systems in lieu of annual offshore sea deployments and retrievals. The maintenance program, detailed in Rationale, is considered to provide an equivalent level of integrity and reliability assurance for lifeboat and ancillary systems while providing an improved level of safety for maintenance and testing personnel in that they are not exposed to falls from heights or entry to sea during lifeboat launching.

## Rationale

The risks posed to personnel during regular maintenance and testing deployments of lifeboats offshore has been well documented and discussed within the local and international offshore oil and gas industry.

Annual deployment of 6-off Hebron davit-launched, PrOD assisted lifeboats from a height of over 30-metres to sea on the Grand Banks, with personnel onboard, poses an inherent safety risk that should be avoided except in real emergency evacuation situations. Similarly, the act of re-attaching and re-setting multiple release hooks and winching lifeboats back up to the lifeboat stations poses a significant risk to personnel that should also be avoided.

In lieu of launching, ExxonMobil has a robust internal and external vendor/OEM maintenance program that also meets SOLAS MSC.1/Circ.1206/Rev.1 requirements. Maintenance, inspection and testing is performed on the lifeboats as per the following schedule:

- Weekly (EM): Visual inspection of davits, support structure, winches, hydraulic reservoirs, wire falls, sockets, shackles, hull, canopy, hatches (gaskets), release hooks, maintenance straps/pennants, and fall protection devices; inspect belts/hoses, check all engine fluids; start engine use OEM startup procedure; check engine coupling bolts; ensure steering is free and ensure spray curtain handle operates freely.
- Monthly (EM): Inspect fall cable, grease all lubrication points, dynamic function test winch, brake and limit switch; start engine, check gearbox oil and control cable linkage, check engine battery, check oil level and pressures in davit hyd. power unit accumulator.
- 3M (EM): Check for oil/grease leakage; check wire rope lifeboat winch - lower lifeboat above water line; inspect hoisting rope for damage; perform visual of the wire ropes and lubricate high wear areas and check for rust/replace; check remote control ropes and lower blocks shackle, lashing belt and ratchet for damage; check electrical system, release hooks and drain plugs for damage.
- 12M (EM): Greasing of motors on lifeboat winches; check tension on belts
- 12M (OEM Vendor/EM): Annual inspection of propulsion system, water spray (visual by OEM vendor, the actual deluge testing performed by Hebron crew prior to arrival of OEM vendor), davits, launch mechanisms and lift mechanisms; lubricate wire falls (completed by Hebron crew), annual lifeboat hooks include in-situ release of hooks; lubricate all hinges and clips; replace engine oil/filters (completed by Hebron crew), check deluge system (actual deluge testing performed by Hebron crew prior to arrival of OEM vendor) , annual inspection of planetary gear inspection port.
- 12M (OEM Vendor/EM): Annual winch and davit maintenance - lowering lifeboat - check sheaves and condition of davit structural areas; check lower blocks and lashing for fatigue; replace gearbox oil (completed by Hebron crew); check brake pads drum and controls; inspect electric motor grounding, check wiring, inspect boat brake release cable and remote control ropes; grease davit hinge pins, function accumulator on the hydraulic power unit on the winch and replace hydraulic oil (hydraulic oil replaced by Hebron crew); test the offload simultaneous release of hooks; perform a dynamic weight test of winch brake with weight on board empty lifeboat.
- 36M (EM): Change out of Accumulator Bladders

60M (Other Vendor/EM): Confirm integrity of deluge system (actual deluge testing performed by Hebron crew prior to arrival of OEM vendor); change out of lifeboat fall wires; renew foundations - check 100% pre-tensioning of the winch and davit foundation bolts;

60M (OEM Vendor): Replace falls, dynamic weight test for winch brake, inspect brake pads and stressed structural parts; perform 5 Year hook overhaul and overload test, dismantling, reassembly and inspection.

Additionally, Hebron's coxswains are trained, competent and prepared to launch in the event of an emergency. The Hebron coxswains are primarily tradespeople (e.g. electricians and mechanics) that also perform weekly, monthly and annual maintenance on the lifeboats. Survival Craft Coxswain training is completed annually at the Marine Institute which requires all candidates to launch a lifeboat. Lifeboat drills are completed every six months at a minimum.

### Summary and Conclusion

The enhanced design features stated previously and proposed maintenance strategies for Hebron lifeboats, ProDs, and Ancillaries in lieu of annual deployments to sea and recovery are considered by ExxonMobil to be consistent with similar approaches undertaken onboard other East Coast Offshore Installations. It is also the position of ExxonMobil that these provisions meet the intent of the Installation Regulations, SOLAS, and satisfy Interpretation Note 11-01 with regards to performance standard assurance of lifeboat evacuation systems in lieu of deployment, while at the same time eliminating the risk to personnel associated with such launches.

This application letter has been reviewed and endorsed by the lifeboat manufacturer (Attachment 1) and the certifying authority (see Attachment 2). The performance standard SCE-41 will be updated as required upon acceptance of this letter. Additionally, this application letter has been reviewed with the platform workplace committee and posted on the platform for public viewing. Workplace committee concurrence has been obtained (see Attachment 3) and the associated CSO approval will also be shared with the committee and posted on the platform.

If there are any questions, or if additional information is required, please contact [REDACTED]

Sincerely,  
[REDACTED]

Hebron Asset Manager

Cc [REDACTED]

Lloyd's Registrar

[Redacted]

**Sent:** Tuesday, September 13, 2022 12:36 PM  
**To:** [Redacted]  
**Subject:** FW: re: LB Letter - Hebron  
**Attachments:** EM letter LB Alt Launching Sept 13 2022 DRAFT.docx

[Redacted]

**From:** [Redacted]  
**Sent:** Tuesday, September 13, 2022 12:24 PM  
**Subject:** FW: re: LB Letter - Hebron

**External Email - Think Before You Click**

[Redacted]

Nord Marine Services Limited is in agreement with the letter as presented.

Sincerely,

[Redacted]

*Director, DSS Group of Companies.  
President, Nord Marine Services Limited*

**From:** [Redacted]  
**Sent:** September 13, 2022 11:23 AM  
**To:** [Redacted]  
**Subject:** FW: re: LB Letter - Hebron



All good with the comments [Redacted] Please provide your email alignment with the letter and we will reissue to the CNLOPB. Thanks.

[Redacted]

[Redacted]



## Attachment 2

### Occupational Health and Safety Deviation Request

To: EMCP: [REDACTED]  
C-NLOPB: P. Alexander

Cc: LR NAME: [REDACTED], LR St. John's: [REDACTED]

From: LR St. John's: [REDACTED]

Your ref CT/-HEB-0212

Our ref NFL/O-11684-HEB-2022-GNL

Lloyd's Register Canada Limited  
Marine & Offshore  
235 Water Street, Suite 105  
St. John's, NL, A1C 1B6

T +001 709 725 7586  
F +001 709 726 0225

21 September 2022

#### SUBJECT: HEBRON – Lifeboat Launching Drill – Alternative Arrangements

With reference to EMCP's Occupational Health and Safety Deviation for Section 30 (3) of the OSH Regulations states that every employer must ensure that "if compliance with subparagraph (2)(d)(ii) is not feasible, the employer must ensure that additional inspections and testing of all components that would otherwise be tested by the launching drill are carried out in consultation with the lifeboat manufacturer and with the prior approval of the Chief Safety Officer." The Certifying Authority has reviewed the submission and find the rational acceptable under Comment Response Sheet (CRS) No. HEB-RDR-FNS-001-R001 attached.

Alternative arrangements and testing have been captured in the Certifying Authorities Verification Schemes. The Operator is requested to review the Performance Standard for Evacuation Equipment HEB-SCE-041 to ensure all aspects outlined in the deviation request have been incorporated accordingly. Confirmation to be submitted to the CA.

If you have any questions, please call

Regards,

[REDACTED]

Surveyor in Charge, Americas Marine & Offshore  
Lloyd's Register Canada Limited  
On behalf of Lloyd's Register North America, Inc.

## Comment Response Sheet

**Client:** ExxonMobil  
**Project:** Hebron Regulatory Deviation Request Project  
**Client Contract No:** [REDACTED]  
**Transmittal No:** 31 March 2022  
**Client reference:**

**CRS number:** HEB-RDR-FNS-001  
**Revision:** 01  
**Status:** Closed  
**CRS Date:** 20 April 2022  
**Page:** 1 of 3

**Attention:** EMCP: [REDACTED]  
**Copied to:** LR: [REDACTED]

**SUBJECT** LB Launching Alternative Arrangements

### DOCUMENT APPRAISAL STATUS SUMMARY

The document(s) below have been examined in accordance with the Work Instruction(s) referenced and are assigned the status code(s) indicated, subject to the following comment(s):

Document No.	Rev.	Title	Status
1	1	SOLAS Attachment 1	RI
2	0	EM letter LB Alt Launching Mar 2022	A

**COMMENT STATUS KEY** ● = Closed Comment ◆ = Open Comment

### APPRAISAL STATUS KEY

A = Approved/Accepted	R = Rejected, not acceptable
AC = Approved/Accepted with conditions	RI = Retained as supporting documentation for information only
H = Hold	S = Superseded
Q = Queries	I = Requested for Information only

### FINAL ACCEPTANCE DEPENDS ON SATISFACTORY SURVEY AND TESTING

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## Comment Response Sheet

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 Client reference:

CRS number: HEB-RDR-FNS-001  
 Revision: 01  
 Page: 2 of 3

### DOCUMENT APPRAISAL DETAILS

Document No.	Rev.	Title	Status
1	1	SOLAS Attachment 1	RI

#### Work Instruction(s):

#### 1. Fire & Safety Comments

- 1.1 ● The above document has been reviewed for fire and safety aspects and is retained for information only.  
 (Comment by [REDACTED])

Document No.	Rev.	Title	Status
2	0	EM letter LB Alt Launching Mar 2022	A

#### Work Instruction(s):

#### 1. Fire & Safety Comments

- 1.1 ● The above document has been reviewed for fire and safety aspects, in relation to C-NLOPB Regulatory requirements and is considered to be acceptable.  
 (Comment by [REDACTED])

#### FINAL ACCEPTANCE DEPENDS ON SATISFACTORY SURVEY AND TESTING

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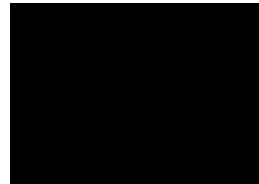
# Comment Response Sheet

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**Revision:** 01  
**Status:** Closed  
**CRS Date:** 20 April 2022  
**Page:** 3 of 3

In preparing this report, the undersigned surveyor is acting as an independent person in accordance with the applicable policy on conflict of interest.

Surveyor to Lloyd's Register:



Co-ordinator / Project Manager:

Client Response Prepared by:

Dated

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## FINAL ACCEPTANCE DEPENDS ON SATISFACTORY SURVEY AND TESTING

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Attachment 3

The Hebron Workplace Safety Committee has reviewed the following item during the meetings of January 30<sup>th</sup> and February 20<sup>th</sup>, 2022 with no objections or concerns:

Topic: *CSO Letter –Alternative Maintenance in lieu of LB Launching*

Co-Chair #1

Name: [REDACTED] Date: MARCH 10 2022

Co-Chair #2

Name [REDACTED] Date: MARCH 17, 2022