

May 10<sup>th</sup> , 2023

Mr. Steve Edwards  
HMDC President  
Hibernia Management and Development Company (HMDC)  
20 Hebron Way  
St. John's, NL  
A1A 0L9

Dear Mr. Edwards:

**Subject: Acceptance of Alternate Means of lifeboat Testing in Lieu of Lifeboat Launching**

We have reviewed your letter dated December 6<sup>th</sup>, 2022 and approve the proposed alternate means to test the integrity and operation of the lifeboats and launching equipment onboard the Hibernia Platform in lieu of actual lifeboat launches. This approval is in accordance with Section 30(3) of the *Canada-Newfoundland and Labrador Occupational Health and Safety Regulations* and is subject to the following conditions:

1. The alternate means of verifying lifeboat integrity adheres to the maintenance and integrity management routines outlined in the request for CSO approval and in Safety Critical Element (SCE) 42 – Evacuation Equipment (HS-O-O-X-FIM-XX-0602.082);
2. Once proven onshore, the CA is to witness the testing of the "dry" deluge connection. Should this arrangement prove feasible for implementation offshore, the CA expects the maintenance plans to be updated to include said testing for the nearest term scheduled annual maintenance.
3. Annual lifeboat maintenance and integrity routines are verified and witnessed by the Certifying Authority;
4. Palfinger Marine service personnel will be in attendance for all Life Saving Equipment (LSE) annual and five yearly inspections;
5. Palfinger Marine recommendations provided in the review of the maintenance/inspection routine for operational readiness of LSE that is used for personal evacuation, will be incorporated into the maintenance plan for lifeboats once deemed practical for offshore execution;
6. A coxswain training program is maintained to ensure coxswains remain competent to launch lifeboats;
7. The application and associated approval letter are to be provided to the Offshore Workplace Committee and posted publicly at the workplace on the Hibernia Platform; and
8. Maintenance and inspections plans submitted as part of the CSO Approval application are considered controlled documents and cannot be modified without concurrence of the Chief Safety Officer (CSO). This will also necessitate concurrence by the Original Equipment Manufacturer (OEM) and the Certifying Authority (CA).

Sincerely,

“Original signed by Paul Alexander”

Paul Alexander MSc, P.Eng, PmP  
Chief Safety Officer