

Chief Safety Officer Decision Rev.1
(Application for Substitution, Equivalency, or Exemption)

Date: 10 August 2017

C-NLOPB Reference: 2017-RQ-0046

Applicant: Suncor

Applicant Reference: RQF 276.1

Installation Name: *Terra Nova FPSO*

Authority: *Canada-Newfoundland and Labrador Atlantic Accord Implementation Act, subsection 151(1) & section 205.069*

Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1) and section 201.66

Regulation: *Subsection 8(2) and 17(5)(a) of the Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer accepts the Applicant's, the owner of the *Terra Nova FPSO*, request for a temporary exemption to use a manual means of flare ignition in lieu of the *Installation Regulations* requirement for an automatic ignition system with the following conditions:

1. The manual means of flare ignition shall be in accordance with the Suncor critical procedure *TN-PE-PR22-X00-051 Controlled ignition of hydrocarbon gas*.
2. All safety pre-cautions as outlined in the previous but similar regulatory query on this matter (RQ 276) shall remain in effect. Additional precautions as outlined in this current RQ shall also be adhered to during this practice.
3. The installation of the proposed automatic pellet launched ignition system shall be installed and operational by end of the Suncor Turnaround 2017 or no later than September 30th, 2017. C-NLOPB considers that the use of flare guns as a manual means of igniting flare tips is an emergency backup to the fitted automatic ignition system required by regulation.
4. This temporary regulatory query shall be rendered expired and no longer valid after September 30th, 2017.

5. Prior to starting back up after the 2017 scheduled turnaround, Suncor shall provide confirmation that the new automatic ignition system is fully functional and operational. If for any reason, the new system fails to automatically ignite the flare on start up, the Terra Nova shall resume shutdown status until the system has been repaired prior to recommencing production operations.



Chief Safety Officer