

**Chief Safety Officer Decision**  
**(Application for Substitution, Equivalency, or Exemption)**

**Date:** 14 March 2018

**C-NLOPB Reference:** 2017-RQ-0143

**Applicant:** ExxonMobil Canada Properties

**Applicant Reference:** RQF-HEB-031 Rev. 1

**Installation Name:** Hebron Platform

**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:** *Newfoundland Offshore Petroleum Installations Regulations Section 18 (3, 13)*

**Decision:**

The Chief Safety Officer accepts the use of a four (4) level emergency shutdown (ESD) system including an automatic shutdown of the surface controlled subsurface safety valve (SCSSV) and annulus safety valve (ASV) for an ESD-1 on the Hebron Installation which is one level below an Abandon Platform Shutdown (APS).

This is consistent with API Recommended Practice 14C (RP 14C) "Recommended Practice for Analysis, Design, Installation, and Testing of Basic Surface Safety Systems for Offshore Production Platforms" and API Recommended Practice 14B (RP 14B) "Design, Installation, Repair and Operation of Subsurface Safety Valve Systems" referenced in Section 47.4 of the Drilling and Production Guidelines.

The Chief Safety Officer also accepts that the Master Valve, Wing Valve and Surface Controlled Subsurface Safety Valve of the L-93 1 (DW1) Cuttings Reinjection Well are shutdown as part of the Drilling Facility Shutdown (DSD) process.



Chief Safety Officer