

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

Date: 2 November 2018

C-NLOPB Reference: 2018-RQ-0027

Applicant: ExxonMobil Canada Ltd., as managing partner of
ExxonMobil Canada Properties

Applicant Reference: RQF-HEB-092

Installation Name: Hebron Platform

Authority: *Canada-Newfoundland and Labrador Atlantic Accord
Implementation Act, subsection 151(1) and 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) of the Newfoundland Offshore Petroleum
Installation Regulations*

Decision:

The Chief Safety Officer accepts the Applicant's, the owner of the *Hebron Installation*, proposal for conducting hot work during normal operations with the following conditions:

1. In all circumstances, hot work should be deferred to periods of shutdown. Where this is not practical or is not the lowest risk approach, hot work may only proceed as defined below and subject to a risk assessment process with appropriate mitigations/precautions in place.
2. Interior Spaces: Hot work in interior non-hazardous locations as outlined in the Application and inclusive of the Welding Shop, is only permitted if work is conducted in accordance with the Installation's Permit to Work System, is not conducted in the vicinity of other sources of ignitable vapor and the following systems are fully functional:
 - i. Sealed HVAC providing a gas tight environment
 - ii. Positive overpressure protection relative to the external process/utility areas from which hazardous vapors may originate.
 - iii. Sealed fire/blast protected doors, bulkheads, decks and fire dampers.
 - iv. Fire Suppression system.
 - v. Fire and gas detection system.
3. Exterior Spaces: Exterior hot work is permitted provided:
 - i. Work is conducted in accordance with EMCP's Work Management System.

- ii. The fire suppression system and gas detection systems are fully functional.
 - iii. When conducting hotwork within 50 m of a source of ignitable vapour, a pressurized habitat is used in accordance with the manufacturer's recommendations.
 - iv. All hazards and risks associated with repair work are to be identified, risk assessed and mitigated to ALARP. This shall include all high and medium risk work activities on the platform and must consider ongoing well operations.
4. The status of drilling and intervention operations including hole section of wells shall be considered in the hot work risk assessment process such that the risk is as low as reasonably practicable.
5. All expectations addressed in the associated C-NLOPB Hot Work Interpretation Note 14-01 apply to this RQF decision and where required, EMCP's Permit to Work System shall reflect the these expectations.

This Decision is effective from the date of issuance herein until the earlier of:

- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or
- b) the date on which the CSO and /or CCO (as applicable) revokes this Decision as a result of i) any enforcement action by the Board related to this Decision or ii) new information or analysis coming to light challenging the assessment upon which this Decision was based, including but not limited to any changes to commitments made by the Applicant in its application.

For greater certainty, Chief Safety Officer will no longer have authority under the *Accord Acts* to grant exemptions for Part III.1 transitional regulations once they are repealed.


Chief Safety Officer