

<u>Chief Safety Officer Decision</u> (Application for Substitution, Equivalency, or Exemption)

Date: 2023-Dec-07 | 8:52:49 AM NST

C-NLOPB Reference: 2023-RQ-0019

Applicant: ExxonMobil Canada Properties

Applicant Reference: RQF-HEB-121

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) & section 201.66

Regulation: Section 25(b) of the Newfoundland Offshore Petroleum Drilling and

Production Regulations

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Hebron Platform*, use of a comprehensive electrical maintenance strategy for safety critical switchgear and motor control centers (MCCs) that includes:

- 1. Daily walkthrough of electrical rooms by Electrical Technicians;
- 2. One-yearly thermography on 600V MCCs (other systems have continuous online condition monitoring systems that alarm if set points are exceeded);
- 3. Three-yearly circuit breaker maintenance;
- 4. Three-yearly grounding checks;
- 5. Three-yearly protective relay function testing; and
- 6. Ten-yearly intrusive inspections focused on confirming the electrical integrity of the bus, as well as performing a general inspection, cleaning, and lubrication.

This is in lieu of the requirement in Subsection 25(b) of the Newfoundland Offshore Petroleum Drilling and Production Regulations, which states "a comprehensive inspection that includes a non-destructive examination of critical joints and structural members of an installation and any critical drilling or production equipment is made at an interval to ensure continued safe operation of the installation or equipment and in any case, at least once in every five-year period". The approval is subject to the following condition:

 Inspection and maintenance shall continue to meet the requirements of the American National Standards Institute/International Electrical Testing Association ANSI/NETA MTS Standard for Maintenance Testing Specifications for Electrical Power Equipment and Systems as amended from time to time and NFPA 70E Standard for Electrical Safety in the Workplace.

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Chief Safety Officer