



Chief Safety Officer and Chief Conservation Officer Decision (Regulatory Equivalence)

Date: December 20, 2012

C-NLOPB Reference: 2012-RQ-0135

Applicant: Suncor Energy.

Applicant Reference: RQF -256

Installation Name: Terra Nova FPSO

Authority: *Canada-Newfoundland Atlantic Accord Implementation Act*, subsection 151(1)

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

Regulation: *Newfoundland Offshore Petroleum Installations Regulations* subsection 61(16)

Decision: In accordance with the Board's November 29, 2012 decision: **Suncor shall not commence production from the Northwest drill centre at the Terra Nova field until either:**

a) Riser 17 is replaced and function tested; or

b) the Chief Conservation Officer and the Chief Safety Officer have approved a regulatory query for an alternate method of removing crude from the subsea lines which is equivalent to the commitments in the Development Plan to flush with water and pig in accordance with the requirements of subsection 61(16) of the Newfoundland Offshore Petroleum Installations Regulations.

The Chief Conservation Officer and Chief Safety Officer consider the approach described in Suncor's RQF-256 for displacing fluids out of Riser 18 as meeting the requirements of subsection 61(16) of the *Newfoundland Offshore Petroleum Installations Regulations* and equivalent to the requirement for pigging and flushing set out in the Development Plan.

This equivalency is subject to the following:

1. Implementation of the standing order *Operation of NWDC with R17 Out of Service*, included in RQF-256, and it being understood by appropriate personnel.
2. Suncor revising its ice management plan as stated in RQF-256, to reflect the time it will take to flush Riser 18 using this alternative method.


Chief Safety Officer


Chief Conservation Officer