



NOTICE OF NON-COMPLIANCE

June 27, 2023

BY E-MAIL

Lamont Malone
 Hebron Asset Manager
 ExxonMobil Canada Properties
 20 Hebron Way
 St. John's, NL, A1A 0L3

Dear Mr. Malone,

Re: Non-Compliances – Incident 2023HEB051

The Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) hereby issues this Notice of Non-Compliance in connection with an incident on the *Hebron* platform on May 28, 2023. The investigation report findings of Incident 2023HEB051 conducted by ExxonMobil Canada Properties (EMCP) were filed with the Board on June 9, 2023. EMCP is the Operator of the *Hebron* platform, having been granted Operations Authorization No. 24020-020-OA07 on July 23 2021.

Factual Information:

From the C-NLOPB's review of the above noted investigation report, we understand that while the drilling maintenance team was completing maintenance on the knuckle boom crane on the *Hebron* platform using a hydraulic pin puller arrangement, the puller rod was exposed to tensile loads above the puller rod yield rating during three of the five attempts to pull the pin. Four of these attempts also exceeded the hydraulic jack rated capacity. The puller rod failed on the fifth attempt. This resulted in the puller rod fracturing and being projected approximately 19m across the pipe deck, striking the top of the northwest pipe deck crash rail. The puller rod then deflected off the crash rail and made a second deflection approximately 12m down to the north pedestal crane bottom landing, finally resting at approximately 14m down on the Utilities/Process Module (UPM) upper deck process north side walkway. The puller rod weighs approximately 6.8 kg. No barriers were in place for the path the puller rod travelled to the crash rail, or for the drop path to the deck and walkway below. The incident had the potential for fatality.

Upon review of the incident report and additional documentation submitted, the following facts have been identified and relate to the following instances of non-compliance:

1. The procedure (CAHE-KCA-OMOPR-15-501-0001) for pulling the pin did not include adequate information to execute the work safely. Specifically:
 - a. The procedure did not include load rating for threaded puller rod and confirmation that the maximum force imposed by the hydraulic jack must not exceed the load rating of the threaded rod;
 - b. The Enerpac catalogue load values for pressure being applied when using a 30 ton, 60 ton, or a 100 ton hydraulic jack were not included in the procedure;
 - c. The maximum safe operating pressure for using the hydraulic pin puller arrangement was not fully understood;
 - d. Detailed, step-by-step instructions on how to perform the pin pulling activity were not included in the procedure; and
 - e. The procedure did not include information on what to do if the employees were unable to successfully remove the luffing cylinder pin.
2. The knuckle boom crane Original Equipment Manufacturer (OEM) recommended procedure for pulling the luffing cylinder pin was not available to the employees.
3. The Job Safety Analysis (JSA) and toolbox talk risk identification card did not identify the puller rod parting as a potential hazard and did not reference exceeding yield load for the threaded puller rod as a hazard to consider.

Specific Non-Compliances:

It is the finding of the Chief Safety Officer that EMCP as the Operator of the Hebron Platform did not comply with the following:

1. The Operator failed to take all reasonable measures to ensure the health and safety of all employees and other individuals at its workplace, contrary to the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act* paragraph 205.012 as noted above under “Factual Information”.
2. The Operator failed to ensure that all the information necessary to pull the pin safely was communicated to the employees contrary to the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act* paragraph 205.013(c) as noted in points 1 and 2 above under “Factual Information”.
3. The Operator failed to ensure that the employees carrying out the pin pulling activities were made aware of known or foreseeable health or safety hazards, contrary to the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act* paragraph 205.013(e) as noted in point 3 above under “Factual Information”.
4. The Operator failed to ensure that the employees carrying out the pin pulling activities and other individuals were provided with the instruction necessary for their health and safety, contrary to the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act* paragraph 205.013(k) as noted above under “Factual Information”.
5. The Operator failed to ensure that a copy of all operating manuals and other procedures and documents necessary to execute the pin pulling activity safely were readily-accessible at the installation, contrary to the *Newfoundland Offshore Petroleum Drilling and Production Regulations* subsection 17(2), as noted in points 1 and 2 above under “Factual Information”.
6. The Operator failed to ensure that personnel conducting the pin pulling activity have, before assuming their duties, the necessary experience and training to safely use the hydraulic pin puller arrangement, contrary to the *Newfoundland Offshore Petroleum Drilling and Production Regulations* subsection 72(a), as noted in points 1(c) above under “Factual Information”.

Corrective Actions:

We acknowledge that ECMP has initiated the implementation of corrective actions to prevent recurrence. In addition, the Chief Safety Officer requires the following items to be addressed:

- As per paragraph 5(2)(b) of the *Canada–Newfoundland and Labrador Offshore Area Occupational Health and Safety Regulations*, the Operator shall conduct an audit to determine all of the failures and gaps in the management system that contributed to these non-compliances;
- The Operator shall conduct a review concerning the use of all jacks and similar tools on the *Hebron* platform to ensure that the force output and associated equipment limitations are included in all relevant procedures;
- Employees and individuals using all jacks and similar tools are trained and competent in their safe usage; and
- Issue an incident bulletin to the local offshore industry.

The results of these actions are to be submitted to the satisfaction of the Chief Safety Officer no later than **September 30, 2023**.

Confirmation is required that this Notice of Non-Compliance has been provided to the Workplace Committee and posted in a public place on the *Hebron* platform. This Notice of Non-Compliance will also be posted to the C-NLOPB website.

Should you have any questions or wish to discuss these matters further please contact the undersigned at

[REDACTED]

Sincerely,
DocuSigned by:

Paul Alexander
Chief Safety Officer