



NOTICE OF NON-COMPLIANCE

October 6, 2020

BY E-MAIL AND COURIER

Jonathan Brown
Senior Vice President, Atlantic Region
Husky Oil Operations Limited.
351 Water Street, Suite 107
St. John's, NL A1C 1C2

C-NLOPB File No. 40050-052-005

Dear Mr. Brown:

Re: Notice of Non-Compliance with the *Newfoundland Offshore Petroleum Drilling and Production Regulations*

I have reviewed the circumstances of the pollution event of June 18, 2020 wherein Husky Oil Operations Limited (Husky) caused pollution by causing an unauthorized discharge of an anti-microbial agent, namely X-Cide 450, to sea in a manner not described in the Environmental Protection Plan. I have also reviewed the causes identified by Husky in its interim investigation report [Husky Document No. WR-HSE-RP-6384] dated July 9, 2020. I have thereby determined that Husky was non-compliant with the *Newfoundland Offshore Petroleum Drilling and Production Regulations* SOR/2009-316, and more particularly paragraph 5(2)(g), subsection 17(2) and paragraph 19(l). Accordingly, Husky is hereby issued this **Notice of Non-Compliance**.

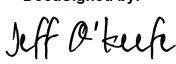
Pursuant to paragraph 189(1)(e) of the *Canada–Newfoundland and Labrador Atlantic Accord Implementation Act*, S.C. 1987, c. 3, Husky is to provide to me with the following information for the period from July 9, 2020 to September 30, 2020, inclusive;

- all operating manuals and other procedures and documents necessary to execute the dosing of the crude rundown line with anti-microbial agent at the *SeaRose* FPSO safely and without pollution; and
- documentation to demonstrate that trained and competent personnel were available to conduct the work described above, that Husky verified that they were trained and competent, and that only trained personnel were used to complete that work.

Given the nature of the documentation requested and the fact that the corrective measures should already be in place as part of Husky's management system, the information should be provided to my satisfaction no later than November 2, 2020.

Should you have any questions or wish to discuss these matters further, please contact me at 709-778-1406 or Ken Taylor, Lead Environmental Compliance Officer, at 709-778-1475.

Sincerely,

DocuSigned by:

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Jeff O'Keefe, P.Eng., P.Geo.
Chief Conservation Officer