

Chief Safety Officer Decision (Regulatory Equivalence)

Date:	16 March 2016
C-NLOPB Reference:	2016-RQ-0045
Applicant:	ExxonMobil Canada Ltd., as managing partner of ExxonMobil Canada Properties
Applicant Reference:	RQF-HEB-071
Installation Name:	Hebron Installation
Authority:	<i>Canada-Newfoundland and Labrador Atlantic Accord</i> <i>Implementation Act,</i> subsection 151(1) & section 205.069
	Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1) and section 201.66
Regulation:	Subsection 24(3) and 24(4) of the Newfoundland Offshore Petroleum Installations Regulations

Decision:

The Chief Safety Officer accepts the Applicant's, the owner of the Hebron Installation, proposal to use alternative methods of fire protection for five electrical spaces on the Hebron Topsides in lieu of the *Newfoundland Offshore Petroleum Installation regulations* requirement to provide and position fire hydrants such that water from any two hydrants, one of which is fitted with only a single length of fire hose and the other of which is fitted with one or two lengths of fire hose, can reach every part of the installation where a fire may occur. The following five electrical spaces can only be reached by two lengths of fire hose from two separate hydrants:

- 1. Small Battery Room within the Main Switchgear Room
- 2. Standby Switchgear Room B
- 3. Uninterruptible Power Supply (UPS) Room B
- 4. Battery Room B
- 5. Small Battery Room within the East Switchgear Room

This acceptance is conditional upon the implementation of the mitigation measures specified in the application which are in addition to the regulatory requirements for fire detection and portable fire fighting systems. In particular and in accordance with the fire-fighting strategy, this includes the provision of:

- 1. Additional portable and/or high capacity (wheeled) CO2 fire extinguishers suitable for class C fires for all five spaces,
- 2. Enhanced very early smoke detection (VESDA) for spaces 2,3 and 4 above; and
- 3. Hydrogen gas detectors in the battery rooms and verification of battery isolation on confirmed hydrogen detection.

Chief Safety Officer