



Chief Safety Officer Decision
(Regulatory Substitution, Equivalency or Exemption)

Date: 1 November 2017

C-NLOPB Reference: 2017-RQ-0119

Applicant: ExxonMobil Canada Properties

Applicant Reference: RQF-HEB-081

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) and section 201.66

Regulation: *Newfoundland Offshore Petroleum Installation Regulations Subsections 18 (1) and (2)*

Decision:

The Chief Safety Officer authorizes the Applicant to operate the coil tubing unit on the Hebron platform without tying into the platform's Emergency Shutdown System as required by the *Newfoundland Offshore Petroleum Installation Regulations* subject to the following conditions:

1. The coiled tubing unit must maintain a current Certifying Authority Inspection Release Note with no outstanding issues and must be operated and maintained in compliance with the associated conditions.
2. The coil tubing unit must be rated for operation in at least a zone II rated hazardous area.
3. The coil tubing unit must continue to be fully compliant with all other requirements of the Installation Regulations.
4. The "General Platform Alarm Procedures for Wireline/Slickline/Coiled Tubing Personnel" and job specific Coiled Tubing Shut-in procedures are to be available in the coil tubing unit.
5. An Emergency Shutdown Drill is to be conducted prior to the start of each coiled tubing operation.
6. The Hebron Basis of Safe Operation document is to be updated to include the emergency shutdown process for the coil tubing unit prior to the start of coiled tubing operations.
7. The Hebron Emergency Shutdown Philosophy and other procedures are to be updated to reflect the emergency shutdown procedures and coiled tubing shut-in procedures, as appropriate.



Chief Safety Officer