

Chief Safety Officer Decision (Regulatory Equivalence)

Date: 15 October 2019

C-NLOPB Reference: 2019-RQ-0021

Applicant: Suncor Energy Inc.

Applicant Reference: RQF 302

Installation Name: Terra Nova FPSO

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 Installations Regulations,
Section 8(2)

Decision:

The Chief Safety Officer accepts the Applicant's proposal to conduct hot work repairs to the Wing Water Ballast Tank, Tank 5 Starboard, Port Slop Tank, Cargo Tank 4 Starboard, Cargo Tank 2 Port and Cargo Tank 2 Starboard onboard the *Terra Nova FPSO* during normal production operations, provided all risk reduction measures outlined in the application are followed. The Application has been approved subject to the following conditions:

1. The safety systems (e.g. fire and gas detection, fire suppression) that are either installed or proposed to be installed for protection of the immediate and surrounding areas are operational for the entirety of this scope of work.
2. The proposed pressurized habitat is installed and used in accordance with manufacturer's recommendations.
3. On loss of positive pressure within the enclosure, all hot work is to cease and any nonhazardous area equipment (i.e. welding machines) to be electrically isolated.
4. All expectations addressed in the associated C-NLOPB Hot Work Interpretation Note 14-01 apply to this RQF decision and where required, the operator's Control of Work and Procedures System and Flame Hot Work Certificate Procedure shall reflect these expectations.
5. Cargo offloading to tanker or bulk marine gas oil transfers from supply vessel during hot work activities are prohibited.
6. Workers conducting hot work in a confined space shall have their personal gas monitors set to alarm at 5% of the Lower Explosive Limit (LEL).
7. All tanks included in the scope of work will be fully isolated prior to entry and carrying out hot work activities.

This Decision is effective from the date of issuance herein until the earlier of:

a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or

b) the date on which the CSO and /or CCO (as applicable) revokes this Decision as a result of i) any enforcement action by the Board related to this Decision or ii) new information or analysis coming to light challenging the assessment upon which this Decision was based, including but not limited to any changes to commitments made by the Applicant in its application.

For greater certainty, Chief Safety Officer will no longer have authority under the Accord Acts to grant exemptions for Part III.1 transitional regulations once they are repealed.

A handwritten signature in blue ink, appearing to read "Paul Alade", written over a horizontal line.

Chief Safety Officer