



Chief Safety Officer Decision
(Application for Substitution, Equivalency, or Exemption)

Date: 2021-Jan-11 | 4:57:03 PM NST

C-NLOPB Reference: 2020-RQ-0043

Applicant: Husky Energy

Applicant Reference: RQ-19-00000679

Installation Name: CGS-West White Rose 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: Subsection 18(3)(b) and 18(13) of the *Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *CGS-West White Rose Platform*, use of a five (5) level emergency shutdown system which will include automatic closure of the surface-controlled subsurface safety valve (SCSSV) and the annulus safety valve (ASV) for an ESD1 and ESD2 or for an ESD3 from a fire or gas event in the wellbay in lieu of the requirements in Subsections 18(3)(b) and 18(13) of the *Newfoundland Offshore Petroleum Installations Regulations*, which require the closure of the downhole safety valve on activation of the emergency shutdown system.

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- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or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, the 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longer have authority under the Accord Acts to grant exemptions for Part III.1 transitional regulations once they are repealed.

DocuSigned by:

A handwritten signature in black ink, appearing to read "P. A. ...", located below the "DocuSigned by:" text.

946243465985468F
Chief Safety Officer