



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

Date: 2020-Ju1-23 | 1:05:49 PM NDT

C-NLOPB Reference: 2020-RQ-0074

Applicant: ExxonMobil Canada Properties

Applicant Reference: RQF-HEB-096

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: *Section 25(6) of the Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Hebron Platform*, to wet test the deluge system annually (nominally 20% per year) in a manner such that the entire system is tested every 5 years, in lieu of the requirements in Subsection 25(6) of the Newfoundland Offshore Petroleum Installations Regulations, which states that a water deluge system provided pursuant to subsection (2) shall meet the requirements of National Fire Protection Association 15, Standard for Water Spray Fixed Systems for Fire Protection, subject to the following conditions:

- 1) The annual nominal 20% Deluge Wet Testing is to be witnessed by the Certifying Authority and the performance data is to be submitted to the Certifying Authority for evaluation and verification of continued integrity;
- 2) If any testing and/or performance data analysis identify any issues of concern that may impact other zones, then the entire deluge system shall be wet tested as soon as reasonably practicable but no later than one year from the date of the test that the concern was identified;
- 3) The Operator is to advise the Chief Safety Officer if the Certifying Authority's evaluation of the annual test data results in the Certifying Authority voiding their approval of this RQ;
- 4) Any modifications to deluge distribution systems (downstream of the deluge skids) will need to be wet tested prior to going into service, unless agreed with the Certifying Authority;
- 5) Any zone not wet tested over the protected area in a given deluge testing campaign is to be tested through the test connection, including water/foam solution testing (as applicable); and
- 6) Any fire monitors that operate in combination with a deluge system shall continue to be tested annually.



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:

Chief Safety Officer