



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

**Date:** 2022-Jul-07 | 8:04:54 PM NDT

**C-NLOPB Reference:** 2021-RQ-0059

**Applicant:** Cenovus Energy

**Applicant Reference:** RQF-WR-039 Rev 1

**Installation Name:** *SeaRose 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) & section 201.66*

**Regulation:** Sections 18(3)(b)(iii) and 18(13) of the *Newfoundland Offshore Petroleum Installations Regulations*

**Decision:**

The Chief Safety Officer approves the Applicant's, the owner of the *SeaRose FPSO*, use of a five (5) level emergency shutdown system which will include automatic closure of the Surface-Controlled Subsurface Safety Valve (SCSSV) for an Emergency Shutdown Level 1 (ESD1) and ESD2 fire or gas event in lieu of the requirements in Sections 18(3)(b)(iii) 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. The SCSSV will remain open during a Process Shutdown (PSD) and an ESD3 as part of the five level emergency shutdown system.

DocuSigned by:  
  
04C2434A59B546B...  
Chief Safety Officer