

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

Date:	2022-Jun-09 10:26:02 AM NDT
C-NLOPB Reference:	2022-RQ-0024
Applicant:	Cenovus Energy
Applicant Reference:	RQ-22-00000691
Installation Name:	SeaRose FPSO
Authority:	<i>Canada-Newfoundland and Labrador Atlantic Accord Implementation Act,</i> subsection 151(1) & section 205.069
	<i>Canada-Newfoundland and Labrador Atlantic Accord Implementation</i> <i>Newfoundland and Labrador Act,</i> subsection 146(1) & section 201.66
Regulation:	Section 8(2) of the <i>Newfoundland Offshore Petroleum Installations</i> <i>Regulations</i>

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *SeaRose FPSO*, proposal to conduct hot work repairs to welding defects on Water Ballast Tank (WBT) 3 Port (P) and Starboard (S) during normal operations, in lieu of the requirements in Subsection 8(2) of the *Newfoundland Offshore Petroleum Installations Regulations*, which states that *"No person shall create or cause to be created any unprotected flame or source of ignition within 50 m of a well, an oil storage tank or other source of ignitable vapour"*, subject to the following conditions:

- 1. All safeguards listed by Cenovus as well as the recommendations outlined by the 3rd party review are strictly adhered to.
- 2. Hot work may not be conducted within both tanks simultaneously.
- 3. There will be no cargo offloading to tanker, internal cargo transfers or bulk fuel transfers during the completion of the WBT hot work.

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Chief Safety Officer