



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

Date: 2023-Jul-05 | 2:03:34 PM NDT

C-NLOPB Reference: 2023-RQ-0014

Applicant: Odfjell Drilling

Applicant Reference: RQF-HW-PIR-034

Installation Name: Hercules

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: *Subsection 8(2) & 8(3) of the Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *MODU Hercules*, proposal to deviate from Subsection 8(2) of the *Newfoundland Offshore Petroleum Installation 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", and Subsection 8(3) which states "No flame-type equipment shall be placed or operated within 25 m of a well, an oil storage tank or other source of ignitable vapour, except, a. where the well is (i) a water supply well, or (ii) a water injection well equipped with a suitable packer and with the surface casing annulus vented outside any building; or b. where emergency works requires the use of flame-type equipment and the wellhead valves and blow-out preventer, if any, are closed" and concurs with the Applicant's proposal to conduct hot work operations onboard the *MODU Hercules* during the operational activities defined in the Application, provided that all risk reduction measures outlined in the application are followed.

In all circumstances, hot work should be deferred to periods when the installation is not connected to the well. Where this is not practical or is not the lowest risk approach, hot work may only proceed as defined below and subject to a risk assessment process with appropriate mitigations/precautions in place:

- Hot work is of an unplanned nature that could not have been reasonably foreseen and completed while previously disconnected;
- The risk of not completing the work is unacceptable and/or it is not possible to progress the operation without completing the hot work scope;
- There is no alternative or temporary means of achieving an acceptable level of safety without the use of hot work; and
- The scope of the hot work is limited to the extent required to safely resume operations.



- All expectations addressed in the associated C-NLOPB Hot Work Interpretation Note 14-01 apply to this RQF decision.

DocuSigned by:

Phil Walsh

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Chief Safety Officer