 Hibernia Management and Development Company Ltd.	RQF#	RQF-HIB-497
REGULATORY QUERY FORM	DATE	22 July 2023
TITLE: CSE – Piping Isolation for M30 Seal Pot Pits		

RQF CATEGORY

- Request for regulatory clarification
- Application for exemption
- Application for use of alternative, codes, standards or methods

Regulatory Approvals Required	Certifying Authority Required
--------------------------------------	--------------------------------------

- | | |
|---|--|
| <input checked="" type="checkbox"/> C-NLOPB | <input type="checkbox"/> Yes |
| | <input checked="" type="checkbox"/> No |

1. REGULATION(s) Current and Proposed

Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations

133 (1) Every employer must ensure that no person enters or remains in a confined space at a workplace under its control unless (d) any mechanical and electrical equipment that is in the confined space but not required to carry out any work there is


- (i) disconnected from its energy source, and
- (ii) isolated, locked out and tagged in accordance with Part 27;

133 (2) The engineering controls referred to in paragraph (1)(g) must, with respect to a pipe containing a hazardous substance or a substance under pressure or at a high temperature, consist of a blank or blind in conjunction with valves or other blocking seals that are secured in the closed position — using a positive mechanical device that is designed to resist being opened inadvertently, other than as a result of excessive force — to prevent the substance from reaching the blank or blind. The employer must ensure that the pipe is clearly marked to indicate the location of the blank or blind and that the valves or seals are clearly marked as being closed.

2. PROPOSAL

HMDC is aligned with use of Positive Isolation methods (Blind, Blank or Physical Disconnection) as the most effective way to manage energy isolation hazards associated with Confined Space Entry (CSE). In the case of the M30 seal pot pit, there is no ability to mechanically positively isolate seal pots due to space limitations on the associated piping [Deviation from OHS Reg 133(1)].

As such, HMDC proposes the use of our Work Management System Best Practice [REDACTED] and 'Work Management System Addendum - Isolation of Piping OSH Regulation Requirements' [REDACTED] for Confined Space Entry. As per the Best Practice, for CSEs that cannot achieve positive isolation, a Risk Screening will be conducted identifying any other potential isolation locations/method that could be used, mitigating controls and approval authority to be documented based on residual risk. HMDC proposes to complete CSE into the M30 Seal Pot Pits in accordance with the mitigations documented in Risk Screening "M30 Seal Pot Pits Plugging for Confined Space Entry" attached. Both sides of Hibernia's Joint Occupational Health and Safety Committee (JOHSC) have reviewed the details of the Risk Screening " M30 Seal Pot Pits Plugging for Confined Space Entry " and have demonstrated concurrence with proposed isolation method.

	Hibernia Management and Development Company Ltd.	RQF#	RQF-HIB-497
REGULATORY QUERY FORM		DATE	22 July 2023
TITLE: CSE – Piping Isolation for M30 Seal Pot Pits			

3. JUSTIFICATION and RATIONALE

There are three seal pot pits in M30 that require access to complete two items:

1. Replace carbon steel drains piping to Titanium
2. Replace carbon steel seal pots to Titanium

For phase 2 piping, there is new titanium piping installed from phase 1, that is currently draining into seal pot SI-2100. In order to replace this seal pot, fluid will be bypassed utilizing temporary pneumatic pumps and hoses. To ensure fluid does not enter the seal pot pit, a plumbers plug is to be used on the inlet / outlet side of the seal pot pit. This same procedure is to be utilized for seal pot SI-2101. Please see temporary pumping details in Figure 2 below.

For phase 3 piping (anticipated to start Q3, 2023), the piping and seal pot SI-2102 is to be replaced as per the same scenario described above. The seal pot pit will require plumbers plugs on the inlets and outlet in order to allow access to remove / replace the seal pot. The fluids will be bypassed utilizing temporary hoses and pneumatic pumps.

Job is anticipated to be approximately 3-4 weeks per pit (x3) with a scope that involves:

- Running hoses
- Implement bypass
- Connecting to pumps
- Removal of seal pot pit cover
- Installation of Plumbers Plug
- Replacement of seal pots and associated piping
- Re-instating seal pot covers once scope completed

Entry into the three seal pot pits to replace seal pots and associated piping is a low risk activity when managed appropriately. HMDC proposes to complete CSE into the seal pot pits with at a minimum the following controls and mitigations:

- Inlet to seal pot pits will be isolated using plumbers plugs [Deviation from OHS Reg 133(2)] which are rated for 12m of head, vs. maximum hydrostatic head expected of <0.5m. See Figure 1 for diagram of proposed plug setup.
- Pipe Internal Diameter (ID) will be cleaned prior to plug installation. Plugs will be inspected prior to initial tank entry and again after tank cleaning prior to worker entry without air.
- Flow to the seal pots to be diverted utilizing temporary pump and hoses. Pumps are staffed 24/7.
- Persons entering confined spaces will be confirmed trained and competent.
- Rescue plan, equipment & personnel available and radio communication used
- Initial gas test before confined space entry and continuous gas monitoring
- Forced air ventilation
- Safety Attendant at access ways

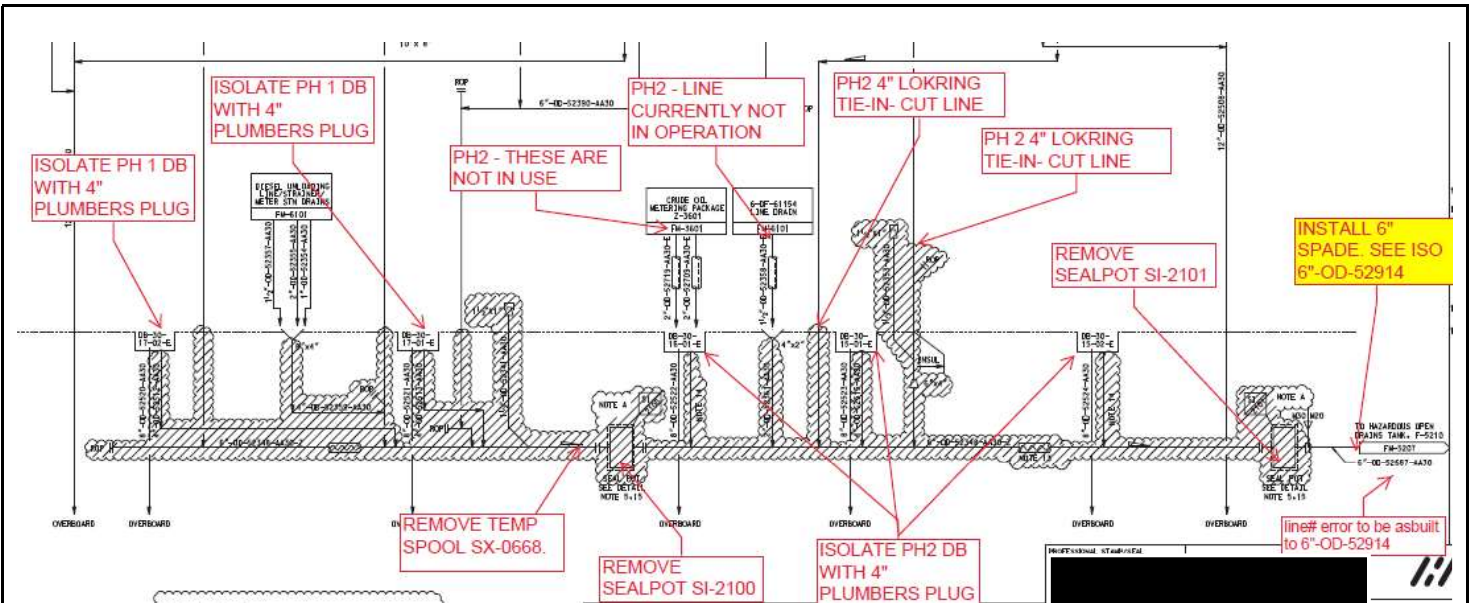


Figure 1 Phase 2 Seal Pots to be Replaced

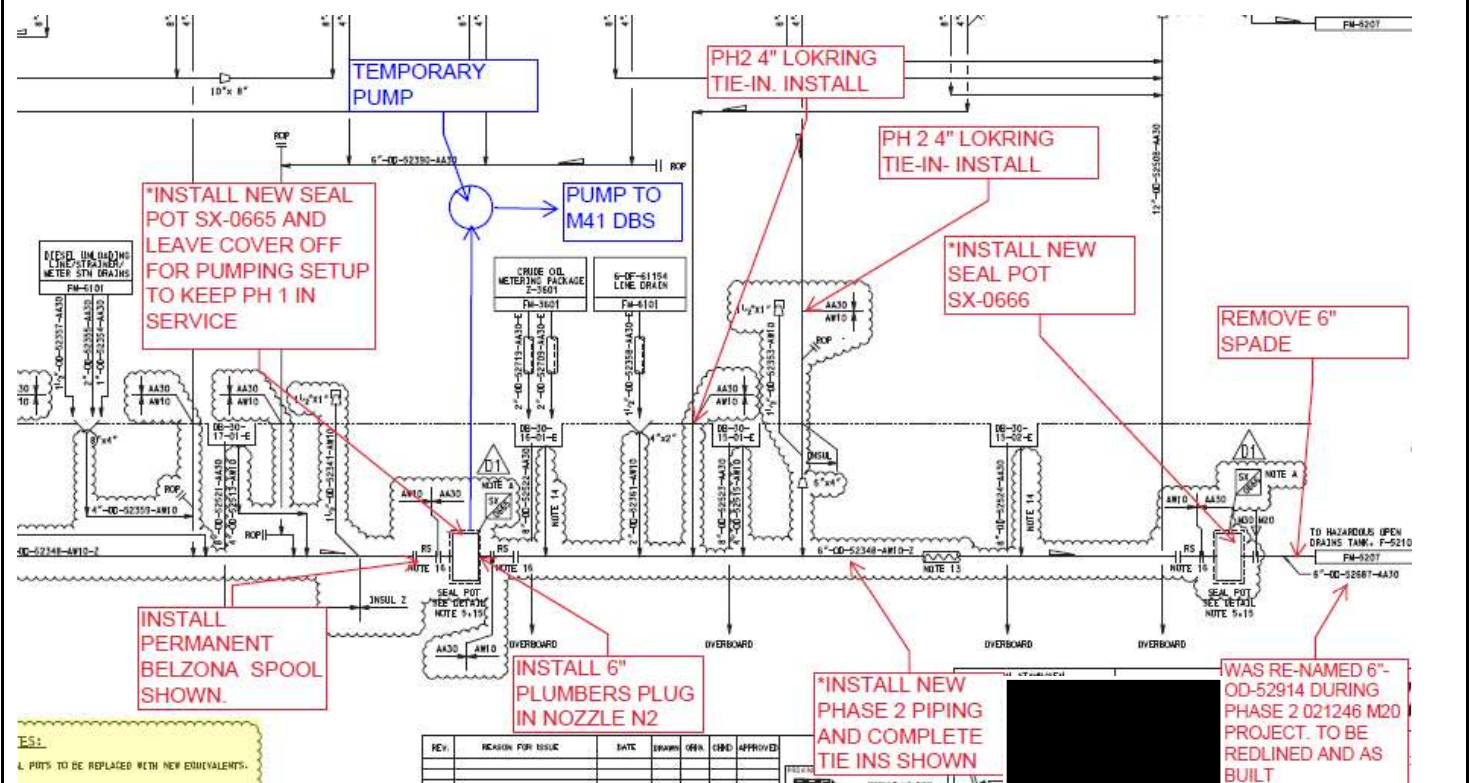


Figure 2 Phase 2 Seal Pot Replacement Temporary Bypass

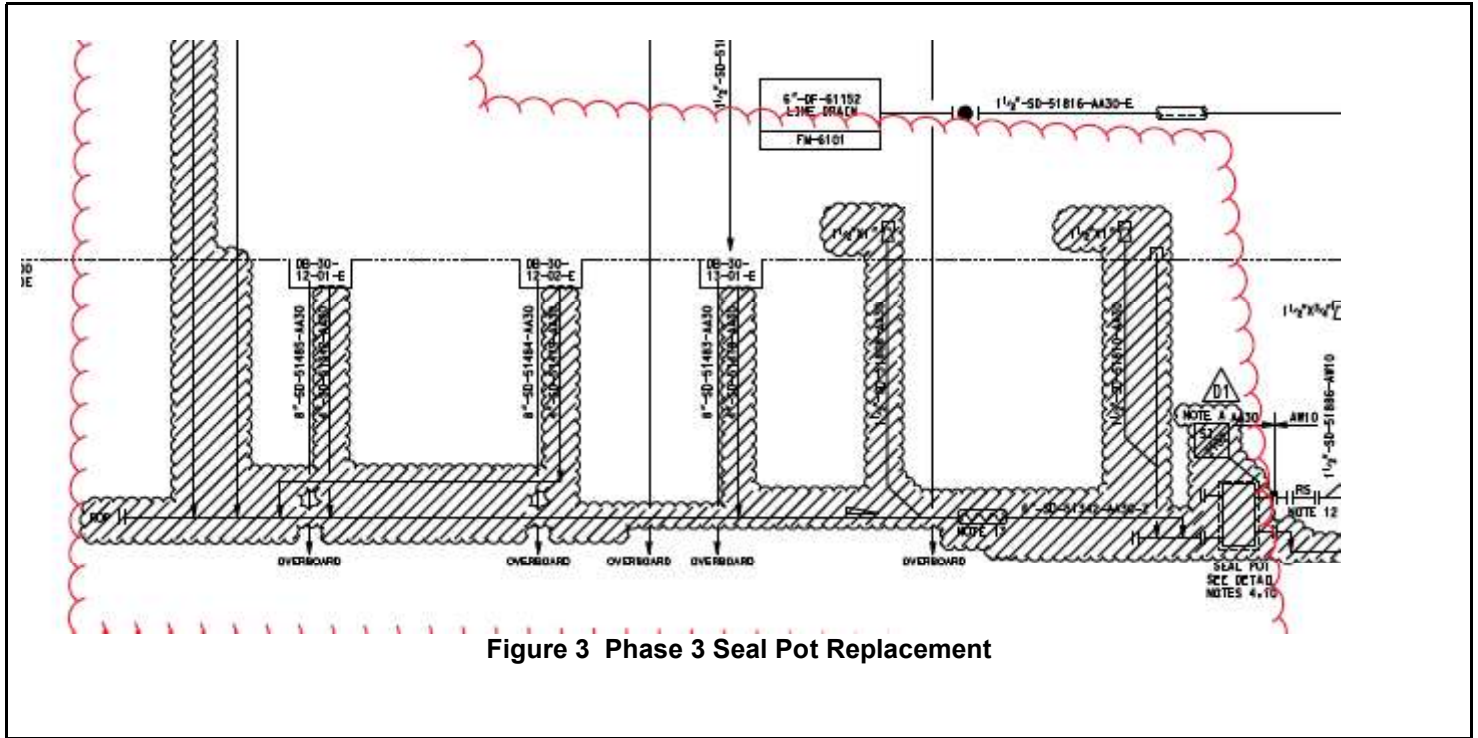


Figure 3 Phase 3 Seal Pot Replacement


4. PRECEDENTS

- RQF-HIB-489 (Piping Isolation for nHODT tank F-5101)

5. REFERENCES

- Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations, Section 133 (2)
- 'Work Management System Addendum - Isolation of Piping OSH Regulation Requirements'

6. ATTACHMENTS

 Hibernia Management and Development Company Ltd.	RQF#	RQF-HIB-497
REGULATORY QUERY FORM	DATE	22 July 2023
TITLE: CSE – Piping Isolation for M30 Seal Pot Pits		

RQF Originator

	Signatures	Date
RQF Originator (Jamie Norris)	 7CB5A2F4C0DA4AD...	August 14, 2023
RQF Originator Supervisor (Michelle Bugden)	 2C2CE17E315145C...	August 15, 2023
Integrity and Maintenance Systems Supervisor (Brent Fischer)	 D0E890C6DB7F404...	August 17, 2023
HMDC SSHE Supervisor (Rob Harris)	 00B86387336C434...	August 21, 2023
Hibernia OIM (Paul Hollett / Mike Harris)	 8422648B010A471...	August 21, 2023
Asset Manager / HMDC President (Steve Edwards / Trevor Bezanson)	 97DB52744774452...	August 21, 2023

Certifying Authority Endorsement

Project Manager - N/A

C-NLOPB Review and Decision

Decision		Title: C-NLOPB Chief Safety Officer
Approved	<input type="checkbox"/>	Date:
Approved with Conditions	<input type="checkbox"/>	
Rejected	<input type="checkbox"/>	
Decision Details Attached?	Yes <input type="checkbox"/>	
		Signature: