CANADA-NEWFOUNDLAND & LABRADOR C-NLOPB OFFSHORE PETROLEUM BOARD

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

Date:	2024-Apr-23 | 5:15:39 PM NDT
C-NLOPB Reference:	2024-RQ-0011
Applicant:	ExxonMobil Canada Properties
Applicant Reference:	RQF-HEB-124
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) & section 201.66
Regulation:	Subsection 11(1)(2)(a) and (b) of the Newfoundland Offshore Petroleum Installations Regulations

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Hebron Platform*, use of cables constructed and tested in accordance with UL 1309 and UL 2556 for cold bend and impact testing of electrical, instrumentation and telecommunications (EIT) cables for the Managed Pressure Drilling (MPD) Rotating Control Device (RCD) piston position sensor cables in lieu of the requirements in Subsection 11(1)(2)(a) and (b) of the *Newfoundland Offshore Petroleum Installations Regulations*, which states "Electrical wiring on an installation shall be: (a) designed in accordance with International Electrotechnical Commission Publication 92-3, Electrical Installations in Ships, Part 3: Cables (construction, testing and installations)... (b) tested for impact at -35 °C and bending at -40 °C in accordance with Canadian Standards Association Standard C22.2 No. 0.3-M1985, Test Methods for Electrical Wires and Cables ..."

The approval is subject to the following condition:

1. The operator and the operator's MPD vendor to execute RCD checks, tests and installation procedures as follows:
   a) Visually verify the proper operation of RCD pistons and position indicator lights prior to the installation of the mandrel above the RCD;
   b) Inspect and maintain the RCD and cables in accordance with applicable codes, standards, and vendor programs;
   c) Complete pull tests, pre-operation flow checks and fingerprinting to confirm RCD bearing and latch integrity.

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Chief Safety Officer