

Chief Safety Officer Decision (Regulatory Equivalence)

Date: 12 June 2015

C-NLOPB Reference: 2015-RQ-0008

Applicant: Husky Energy

Applicant Reference: RQF-WR-0294

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) and section 201.66

Regulation: Section 8(2) of the Newfoundland Offshore Petroleum Installations

Regulations

Decision:

The Chief Safety Officer concurs with the Applicant's proposal to conduct hot work to repair the produced water caisson during normal production operations provided all risk reduction measures outlined in the Application are followed. The Application has been approved subject to the following conditions:

- 1. The safety systems (e.g. fire and gas detection, fire suppression) either installed or proposed to be installed to protect the immediate area and surrounding areas are fully operational.
- Ensure COT #4 & #5 port are drained, purged and the hydrocarbon content reduced to less than 2 % by volume.
- 3. The pressurized habitat proposed is installed and used in accordance with manufacturer's recommendations.
- 4. On loss of positive pressure within the enclosure all welding is to cease and any non-hazardous area rated equipment (i.e. welding machines) are electrically isolated.
- 5. If work is not completed before the upcoming turnaround, it must be completed during the turnaround.
- 6. All hazards and risk associated with repair work are to be identified, risk assessed and mitigated to ALARP and the operator is responsible to ensure the safety of the crew onboard while carrying out the hot work repair to the PW Caisson.
- 7. Husky adheres to the DNV GL conditions as listed in the DNV GL Letter of Concurrence dated March 31, 2015.
- 8. Conduct a drill of evacuation and rescue plan prior to commencing any hot work activity.