

Chief Safety Officer Decision (Regulatory Equivalence)

Date: 19 June 2015

C-NLOPB Reference: 2014-RQ-0113 Rev 1

Applicant: Seadrill

Applicant Reference: WH-IR-OSH-028

Installation Name: West Hercules

Authority: *Canada-Newfoundland Atlantic Accord Implementation Act, subsection 151(1)*
Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1)

Regulation: *Subsection 8(2) of the Newfoundland Offshore Petroleum Installation Regulations*
Section 1.1 of the Draft Petroleum OSH Regulations
Section 11.6 of the Draft Petroleum OSH Regulations
Section 17.4 of the Draft Petroleum OSH Regulations

Decision:

The Chief Safety Officer concurs with the following in respect of the Applicant's proposal to conduct hot work operations onboard the West Hercules:

1. 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.
2. Hot work, while connected to a development well, is not allowed when the Installation is:
 - Drilling in hole sections with targeted reservoir sections.
 - Performing riserless drilling

3. Hot work, while connected to a delineation or exploration well, is not allowed except as otherwise permitted by this decision.
4. Hot work, while not connected to the well, is allowed if:
 - the work is conducted in accordance with the Installation's permit to work system and risk assessment procedure
 - the work is not conducted in the vicinity of other sources of ignitable vapor
 - the fire suppression systems and fire and gas detection systems are fully functional
 - the measures outlined in the Application are followed.
5. Hot work, in interior non-hazardous locations as outlined in the Application and inclusive of the welding shop, is only permitted if work is conducted in accordance with the Installation's permit to work system, is not conducted in the vicinity of other sources of ignitable vapor and the following systems are fully functional:
 - Sealed HVAC providing a gas tight environment
 - Sealed fire/blast protected doors
 - Fire suppression systems
 - Fire and gas detection systems

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

No other hot work activities are approved.


Chief Safety Officer