

Chief Safety Officer Decision

Decision Date: May 24, 2019

Applicant: ExxonMobil Canada Properties

Reference: RQ 168 Rev. 1 - Thebaud Complex (TPP & TWP) Facilities Transition and Lighthouse Mode

Project: Sable Offshore Energy Project

Installation Name: Thebaud Complex

Authority: Canada-Nova Scotia Offshore Petroleum Resources Accord Implementation Act (Federal version), Section 155(1)(a) and (b)

Regulation: Nova Scotia Offshore Petroleum Installations Regulations, Sections 11(4)(a), 12(3)(a), 12(3)(b)(i), 12(3)(b)(ii), 12(4), 24(2)(a), 29, 31, 32, 34 and 36

Decision:

ExxonMobil Canada Properties (Exxon) has requested deviations from Sections 11(4)(a), 12(3)(a), 12(3)(b)(i), 12(3)(b)(ii), 12(4), 24(2)(a), 29, 31, 32, 34 and 36, relating to primary and emergency electrical power, fire hydrant systems and extinguishers, fire and gas detection systems, and alarm and communications systems for the Thebaud Complex. The Thebaud Complex will be transitioning from an attended production installation to a fully-unattended, permanently-isolated, hydrocarbon-free facility awaiting removal (i.e. "lighthouse mode").

The Operator's proposal breaks the activity into three phases of activity to achieve final lighthouse mode. Rationale for acceptance of deviations during:

- Phase 1 recognizes that production systems are being taken offline and de-inventoried, with considerations including that Sable Field gas production has ceased, the installation's wells have been plugged and abandoned, and pipelines and process systems have been depressurized.
- Phase 2 recognizes that utility and accommodations systems are being taken offline and de-inventoried, with considerations including that emergency power and fire systems remain available, primary power will be supplied by a temporary generator, and the installation's accommodations will no longer be used to support interventions to satellite platforms.
- Phase 3 recognizes that continuous access to the installation is no longer required and personnel will only be present on an intervention basis when weather is suitable for visual flight rules. Considerations include availability of crane use, primary and emergency power, fire systems, emergency egress systems, and presence of standby vessel through to the final intervention.

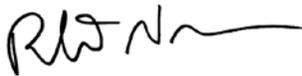
Once lighthouse mode is achieved, there will be no work activities or personnel on the platform. The only equipment that will be functioning on the platform while awaiting removal will be the solar powered navigational aids.

The Certifying Authority concurs that the proposal meets the requirements of Certificate of Fitness Regulations Section 4(2)(a)(ii).

Acceptance of the deviation is conditional on the following:

- 1) The Thebaud Galley Active Fire Suppression System to remain in service as long as the Galley is used for food preparation.
- 2) The CNSOPB is to be advised in writing prior to commencing Phase 3 of the proposed operations.
- 3) Life Buoys currently in place on the platform will continue to be maintained and only removed as part of the final work scope, just prior to leaving the facility in ready for removal stage (lighthouse mode).
- 4) Platform Layout Placards to remain in place around the facility marking major equipment and escape routes. The placards must be updated or appropriately modified to identify that Life Saving Appliances are no longer in place as indicated.

The Chief Safety Officer hereby grants a deviation from the Nova Scotia Offshore Petroleum Installations Regulations - Sections 11(4)(a), 12(3)(a), 12(3) (b)(i), 12(3)(b)(ii), 12(4), 24(2)(a), 29, 31, 32, 34 and 36, subject to the above conditions, and is satisfied that these arrangements provide an equivalent level of safety to that provided by the Regulations.



Robert Normore, B.Tech., CRSP
Chief Safety Officer