



Chief Safety Officer Decision

Decision Date: May 24, 2019
Applicant: ExxonMobil Canada Properties
Reference: RQ 170 - 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 210.07(1) and 93(1)
Regulation: Canada - Nova Scotia Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations, Sections 56 (2)(b), 93 and 298

Decision:

ExxonMobil Canada Properties (Exxon) has requested deviations from Sections 56 (2)(b), 93, 298, relating to emergency lighting systems, wash basins, and emergency drills for the Thebaud process platform (TPP) and Thebaud wellhead platform (TWP) for activities to transition the installation to "lighthouse mode" in preparation for removal.

The Operator's proposal breaks the activity into three phases of activity to achieve final lighthouse mode. Once achieved, there will be no work activities or personnel on the installation, and emergency drills will no longer be necessary. 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 batteries will be removed from the designated emergency lights, with considerations including that plug-in style battery back-up lights will be placed inside the accommodations area, and normal lighting remains powered by primary and emergency power sources.
- Phase 3 recognizes that the platform will only be attended and powered during visual flight rules interventions. Considerations include the availability of the normal lighting, and provision of head-lamps in addition to the plug-in battery back-up lights (which may have reduced functionality while recharging). Washbasins will be supplied with cold water and hand sanitizer.

The workforce has been consulted. No concerns were identified during the public comment period.

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

The Chief Safety Officer hereby grants a deviation from the Nova Scotia Offshore Petroleum Installations Regulations, Sections 56 (2)(b), 93 and 298, and is satisfied that these arrangements protect the health and safety of employees.

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