Chief Safety Officer Decision

Decision Date: 11 October 2019
Applicant: SBM Nova Scotia Contractors Inc.
Reference: RQ-074, Rev 3, Deluge Testing
Project: Encana - Deep Panuke
Installation Name: Production Field Centre
Authority: Canada-Nova Scotia Offshore Petroleum Resources Accord Implementation Act (Federal version), Section 155(1)(a)
Regulation: Nova Scotia Offshore Petroleum Installations Regulations, Section 25(6)

Decision:

SBM Nova Scotia Contractors Inc. has requested a deviation to Section 25(6), requiring water deluge systems to be designed in accordance with a specified NFPA reference document, which in turn sets out requirements for inspection, testing and maintenance of those systems.

The requested deviation is to allow the observation of deluge water discharge patterns into the fire zones of the plant to be limited to zones identified with remaining hydrocarbon inventory, and performed as per the established schedule.

Acceptance of this deviation is based on the rationale that with the exception of diesel and heli-fuel systems, hydrocarbon and production inventory has been removed, the plant is isolated from the reservoirs, and the pipeline is cleaned and disconnected. All discharge patterns for the fire zones have been previously tested, and the system will otherwise continue to be inspected, tested and maintained in accordance with the specified NFPA reference document.

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, Section 25(6), 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