



Chief Safety Officer Decision

Decision Date: April 29, 2019
Applicant: ExxonMobil Canada Properties
Reference: RQ-169 - Compression Platform Facilities Transition and Lighthouse Mode
Project: Sable Offshore Energy Project
Installation Name: Thebaud Compression Platform
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, 22, 29, 31, 32, 34, 36(5) and 36(7)(b)

Decision:

ExxonMobil Canada Properties (Exxon) has requested a deviation to Sections 11(4)(a), 12, 22, 29, 31, 32, 34, 36(5) and 36(7)(b), relating to primary and emergency electrical power, life saving equipment and fire extinguishers, fire and gas detection systems, and alarm and communications systems for the Thebaud compression platform, which is connected via bridge to the Thebaud Complex (includes Thebaud process platform and Thebaud wellhead platform). Compression platform will be transitioning to "lighthouse mode", and once achieved, there will be no work activities or personnel accessing the platform.

Acceptance of this deviation is based on the rationale that Sable Field gas production has ceased and pipelines and process systems have been depressurized. Considerations include that the transition activity can be supported from the Thebaud process platform, with the reduced fire and gas risk allowing unimpeded egress to the process platform temporary safe refuge (TSR) from the compression platform in an emergency.

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:

- Life Buoys currently in place on Thebaud compression 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).
- 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.
- Once in lighthouse mode, appropriate barriers and signage must be in place at the bridge access points.

The Chief Safety Officer hereby grants a deviation from the Nova Scotia Offshore Petroleum Installations Regulations, Sections 11(4)(a), 12, 22, 29, 31, 32, 34, 36(5) and 36(7)(b), 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