



Chief Safety Officer Decision
(Application for Substitution, Equivalency, or Exemption)

Date: April 3, 2023

C-NLOPB Reference: 2023-RQ-0010

Applicant: Cenovus Energy

Applicant Reference: RQ-2023-03-28-467

Installation Name: SeaRose FPSO

Authority: *Canada-Newfoundland and Labrador Atlantic Accord Implementation Act, subsection 151(1) & section 205.069*

Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1) & section 201.66

Regulation: Section 8(2) of the *Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the Operator of the *SeaRose FPSO*, proposal to conduct hot work to upgrade the power turbines on the *SeaRose FPSO*. This approval allows for the hot work required to upgrade MPG A to be performed during the production shutdown period and the upgrades to MPG B and MPG C are approved to be repaired during normal operations with the use of a pressurized habitat, in lieu of the requirements in Subsection 8(2) of the *Newfoundland Offshore Petroleum Installations Regulations*, which states that "No person shall create or cause to be created any unprotected flame or source of ignition within 50 m of a well, an oil storage tank or other source of ignitable vapour", subject to the following conditions:

1. All safeguards listed by Cenovus as well as the recommendations outlined by the 3rd party review are strictly adhered to.
2. The plant shall be depressurized and if applicable, any systems related to the MPG A hot work scope shall be purged and made inert.
3. There will be no cargo offloading to tanker, internal cargo transfers or bulk fuel transfers during the completion of the hot work for each MPG.

DocuSigned by:

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Chief Safety Officer