

Hi Daniel,

Please find below my comments regarding the Framework Regulations Phase 3 Policy Intentions document.

I am sorry that these are just coming to you, I was on vacation in the last couple of weeks and only just got back.

You may have already received some of these comments from others, but I decided to send them in anyway.

1. Section 6.5 CONCEPT SAFETY ANALYSIS

...as well as all installations, facilities, equipment and systems that are proposed as part of the development concept.

Clarity is required regarding section 6.5 with respect to when Mobile Offshore Drilling Units (MODUs)/Semi Submersibles are used for drilling as part of a development concept. What concept safety analysis would then be required for those MODUs?

2. Section 6.3 INNOVATION

The operator shall ensure that any new proposed technology has been independently verified, through a systematic and comprehensive technology qualification process, to be safe and fit for purpose for its intended application.

Clarity is required as to what would qualify as “independent verification?” Will verification done by the R&D department/unit of a company count as “independently verified” for the use of the same company?

3. Section 6.7 PASSIVE FIRE AND BLAST PROTECTION

(2) The operator shall ensure that passive fire and blast protection and division arrangements are designed to protect against and mitigate foreseeable accidental events and loads identified in the fire, explosion and hazardous gas risk assessment required under 6.6.

(3) At a minimum, the operator shall ensure that:

- a. the following areas shall be separated from other areas by divisions that are designed equipped, installed and maintained to prevent the passage of smoke and flame, and to limit the unexposed face to an average temperature increase of 139 °C and a maximum temperature rise of 180°C above the initial temperature following 120 minutes of exposure to a hydrocarbon fire:

- i. external bulkheads of the Temporary Safe Refuge, accommodations, evacuation embarkation points excluding helidecks, and control rooms that are facing production or well heads; and
 - ii. the bulkheads that segregate the well head and production process areas from other areas of the installation; and
- b. in respect to passive fire and blast protection, the offshore installation shall comply with the appropriate rules of a classification society as if it were an offshore installation to which those rules applied.

The requirements specified in section 3 are not typical for MODUs and cannot generally be met by MODUs. It seems to be that these requirements are targeted at development projects/installations where hydrocarbons are being brought to the surface. This should be clarified in the policy intent document.

4. Section 6.20 VENTILATION OF HAZARDOUS AND NON-HAZARDOUS LOCATIONS

...(5)

- a. be maintained at a positive overpressure relative to atmospheric pressure; and
- b. have airlock arrangements on all external doors.

Typically, either a or b would be in place on MODUs. Specifically requiring both a and b on all external doors would be onerous for MODUs. These have been subject of several RQs and either a or b has been justified in lieu of having a and b

5. Section 7.27 REFERENCE FOR WELL DEPTH

The operator shall ensure that any depth in a well is measured from a single reference point, which is either the kelly bushing or the rotary table of the drilling rig.

Reference to Kelly bushing is dated. Need to remove and use rotary table.

6. ANNEX 2 – DEFINITIONS

"installation" means a drilling installation, a production installation, or an accommodation installation

Vessels are not defined as Installations - How do you deal with vessels/seismic vessels then? What about intervention vessels?

Regards,



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