

May 13, 2024

Bjørn Boge
Hercules Rig Manager
Odjfell Drilling
Kokstadflaten 35 • 5257 Kokstad
NO-5863 Bergen • Norway

Dear Mr. Boge:

Subject: CSO Approval of Alternative to Section 30(2) – Annual lifeboat launching drill

We have reviewed your letter DOCS-#2480821 dated December 15, 2023 and approve the proposed alternate means to test the integrity and operation of the lifeboats and associated launching systems onboard the MODU Hercules in lieu of actual lifeboat launches. This approval is in accordance with section 30(3) of the *Canada Newfoundland and Labrador Occupational Health and Safety Regulations*.

This approval is subject to all the mitigations listed in the request for approval and to the following additional requirements:

1. A coxswain training program is maintained to ensure coxswains remain competent to launch lifeboats;
2. The alternate means of verifying lifeboat integrity adheres to the maintenance and integrity management routines outlined in the request for approval and per the Safety and Environmental Critical Element ER3-TEMPSC Performance Standard (L-4-MODU-DSH-E-MA-450-22);
3. Lifeboat maintenance and integrity routines are verified and witnessed by the Certifying Authority (CA) and in accordance with the CA verification scheme;
4. Lifeboat Original Equipment Manufacturer (OEM) maintenance, inspection and testing is performed as outlined in the request for approval; and
5. Supporting documents to support the request, including maintenance, inspection and testing plans submitted as part of the CSO Approval application are considered controlled documents and cannot be modified without concurrence of the CSO, OEM and CA.

Please ensure that this approval letter and the CSO Approval application are provided to the Workplace Committee and posted publicly at the workplace.

C-NLOPB will post a copy of the application and this CSO Approval on the C-NLOPB website.

Sincerely,
"Original signed by CSO"
Paul Alexander
Chief Safety Officer