

2016 Environmental Assessment Update: Hebron Project Comprehensive Study Report
(Amec Foster Wheeler February 26, 2016)

SPECIFIC COMMENTS

Canada – Newfoundland and Labrador Offshore Petroleum Board

§ 1 Introduction, 2nd paragraph, pg 1 – It is stated that hook-up and commissioning activities plan to occur in 2016. Details on this activity in 2016 should be described in this EA Update.

§ 2 Project Description (Planned 2016 Activities), 1st paragraph, pg 4 – It is important to note that the “Project Area” that was amended in 2013 was only for seismic surveys, as noted in the “Hebron Project Comprehensive Study Report Addendum” (June 2013) which stated that *The amended Offshore Project Area defined herein will replace the original Offshore Project Area in the Hebron Project CSR, for seismic surveys only; the Offshore Study Area (Figure 2-2) remains unchanged.* The legend in Figure 1.1 should reflect that.

§ 2.5 Other Project Updates and Definitions, page 9 - Hebron has proposed to leave equipment in the centre shaft consisting of two Alimak elevator carts (steel, plastic and aluminum) and four submersible ballast pumps. There is no CSR discussion of any such temporary equipment being left in the centre shaft. The submersible pumps each contain 70L of a 70/30 MEG water mixture. The CSR does discuss discharges of glycol but it is in the context of subsea development and not from equipment left in the centre shaft of the GBS. Therefore unless there is a compelling reason that prohibits or it is inherently unsafe to remove the pumps, they should be removed along with Alimak elevator carts.

§ 2.5 Other Project Updates and Definitions, page 9 – It is stated that the maximum residual chlorine concentration for cooling water would be 2 ppm. This is in contradiction to the CSR, which on page 9-44 state: “Cooling water will be chlorinated and discharged overboard at an approximate temperature of 30°C, with a residual chlorine level <0.5 ppm.” The residual chlorine concentration of the cooling water discharge should be as stated in the CSR.

Environment Canada (EC)

§ 2.1.2 OLS Sal Base / Hose Installation Program, page 5 – It is indicated that pile excavation will occur to a depth of approximately 6 meters using a soil plug removal tool. EC requests additional information regarding installation of the Single Load Anchor and the Proponent is asked to clarify how and where the soil plug will be disposed.