

October 27, 2006

File #: MD-27561

Initials: _____

Ms. Kim Coady, Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
Fifth Floor, TD Place
140 Water Street
St. John's, NL
A1C 6H6

Canada-Newfoundland and Labrador
Offshore Petroleum Board

RE: Husky Energy Drill Centre Construction & Operations Program – Environmental Assessment Report

Dear Ms. Coady:

We have reviewed the *'Husky Energy Drill Centre Construction & Operations Program – Environmental Assessment Report'* and it satisfies this Department's concerns relating to fish habitat, fish, commercial fisheries and species at risk.

This report has conducted appropriate levels of consultations with all levels of government and fishing industry stakeholders which we support. A new addition to the environmental assessment (EA) was a comprehensive section on accidental spills, which is important for all oceans resource users to recognize.

We raise the following points for clarification and possible editing purposes:

- Sediment excavation will remove 155,540 cubic meters of sediment in a zone of 70 X 70 meters for each glory hole. In addition to direct habitat/sediment removal, suspension of sediment will occur. In light of bottom currents, the zone of influence has the potential to be greater than 70m X 70m. Has the actual zone of influence been modeled or assessed to this point?
- For fish habitat and fish tables that summarize the environmental effects, you have noted negative effects that occur at a continuous frequency. More clarity is needed when you identify these effects as reversible. What is the time frame for disturbed habitat restoration and for negatively affected fish species to rehabilitate?
- Thirdly is a minor editing comment. Our department is the Department of Fisheries and Aquaculture, not Department of Fisheries, Food and Aquaculture as stated on page 11 of the report.

A positive point that Husky Energy may wish to emphasize is the scallop habitat restoration efforts in Placentia Bay as a condition of their HADD permit from Fisheries and Oceans Canada. Husky Energy is doing some great work with local fishers and community groups. This is a positive example of offshore oil and gas efforts for environmental protection and concern for other sectors.

Thank you for the opportunity to provide constructive feedback on this report. We are pleased to be part of this process in support of offshore oil and gas exploration, development and production in Newfoundland & Labrador.

Sincerely,

Tom Dooley,
Director
Sustainable Fisheries and Oceans Policy Division

p.c.: Patrick Shea