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Kim Coady  
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Offshore Petroleum Board  
5th Floor, TD Place  
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**Subject: NRCan comments on the Husky White Rose - New Drill Centre  
Construction Project EIS**

Dear Kim:

Please find comments on the screening EA for "Husky White Rose Development Project: new Drill Centre Construction and Operation Programs Environmental Assessment", September 2006 prepared by LGL Ltd. environmental research associates.

Back in 2000, NRCan had provided comments on White Rose Development Project and have asked the same reviewers the review expansion project as well. In regards to this project, NRCan's expertise and comments lies in aspects related to physical oceanography, sea-bed geology, ice, and icebergs.

It is important to note that as some of the issues were covered in the earlier project (2000) there is not much to comment on this EA. Also, there is no need for NRCan to provide comments on the seismic design levels and accident mitigation plans for the add-on that will most certainly be adopted for the first phase of the project. This is an expansion project and no new onshore facilities are proposed.

Should you have any questions regarding the above please do not hesitate to contact me at (613) 995-4434.

Sincerely,

Kim Mann  
Environmental Assessment Officer

Attach.

**Canada**

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## **Comments from the Geological Survey of Canada**

NRCan has no substantive comments. There is little in this geological or seabed update so it is hard to find much to comment on. There is no discussion of the iceberg scour environment, seabed sediments, or the character of the sediments that will be dredged. It is surprising given the significant volume of material provided on the physical and biological environments. NRCan does not dispute their findings on dredge spoils or modeled transport of drill muds.

They reference a clearance height of 2 or 3 m above subsea installations to protect from iceberg keels. Not sure which, NRCan expects they will try for 3 but the Board will probably allow 2 m. The decision on the clearance depth and resulting necessary depth of the glory holes (11 m max) is based on ice scour risk assessment and modeling they would have done, but it is not presented here. That said, the project was passed with similar design scenarios for the main project. Approaches and issues are similar to the original project. They have all NRCan's data for the risk assessment; CNLOPB would determine whether their risk assessment was valid, not NRCan.

There is no need to comment on shore issues, as spill issues are no different than original project and they are not proposing new onshore facilities.