



File #: 7705 H6 4

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November 20, 2006

Ms. Kim Coady
Canada Newfoundland Offshore Petroleum Board
Fifth Floor, TD Place
140 Water Street
St. John's, NF A1C 6H6

Dear Ms. Coady:

RE: WR HSE RP 4003 Husky White Rose Development Project: New Drill Centre Construction and Operations Program Environmental Assessment Orphan [Draft]

One Ocean has, as requested, reviewed the draft EA Report for the above referenced project. Our comments are as follows:

3.5.2 Drilling

What type of mooring and anchor system will the proponent use? Are the anchors determined by seafloor characteristics and water depth? It is important that the impact of these systems on the seafloor is considered for mitigation purposes.

3.5.5 Abandonment

This section refers readers to section 3.8.6. where abandonment for the end of the Husky project is briefly outlined, however there is nothing to explain Abandonment Methods (3.8.6.2.). Does the proponent plan to apply for well abandonment for this specific project? Or is that implied by section 3.8.6.?

/ Information on Consultations

The proponents listing of One Ocean and the FFAW under organizations consulted, is correct; however section 5.6.1. gives the impression that these two entities are joined; they are listed in the same line. One Ocean kindly asks that the proponent use the format in section 3.7 for all further references.

3.10 Seismic Survey Equipment (Geohazard and VSP Surveys)

It is anticipated that the C-NLOPB will adopt and enforce a national seismic code of practice, *Mitigation of Seismic Noise in the Marine Environment*, upon its completion. This report, although in Draft form should be referenced in future EAs, specifically in terms of mitigation measures for Fish and Fisheries (One Ocean does recognize that seismic programs for this project are under separate cover [Canning & Pitt 2005]).

5.5.3.2. Atlantic Cod

The importance of the Northern Cod in NL is not evidenced in this section. The most recent and updated information on this species does not seem to be thoroughly covered. Both the Hawke Channel and Bonavista Corridor are referenced in this section but are not referenced in a Figure as they should be.

5.6.3.3.1. Snow Crab

At the very end of this section the document states that the Project Area at its closest point is *several* kilometres from any usual concentrations of snow crab fishing found to the east and that *most* of the Project Area is much farther away than this. *Several* and *most* are not appropriate descriptions, especially if we are to use Figures 5.19 to 5.21 as suggested in the document as references. More specific information on proximity is required and the Figures are miniscule. Figure 5.1 illustrates the Bonavista Cod Box and it is suggested that all figures referencing fish include the box and are illustrated in a more reader-friendly manner to decipher the Project Area and what it is referencing.

7.6.2.6.1. Cement

The report states that cement would be released during the Drilling Phase to the amount of 33 t per well. It also states that the release has the potential to affect all fish life stages with the exception perhaps of eggs of some species and larvae. What are these affects? and a more detailed explanation of how the effects of cement on fish would be *negligible* is requested

I hope that these comments will assist your work in the WR HSE RP Draft EA.

Please contact me at your convenience if you would like to discuss in further detail.

Regards,



Maureen Murphy
Research Analyst, Secretary-Treasurer
One Ocean Corporation