

From: EC  
Sent: Monday, June 17, 2013 2:00 PM  
To: C-NLOPB  
Cc: EC  
Subject: EC Response 2013-012: HMDC Seismic Program for the Hibernia Oil and Gas Production Field 2013-end of the life of the field Environmental Assessment  
Attachments: EC Response 2013-012 Hibernia Management and Development Company Seismic Program for the Hibernia Oil and Gas Production Field 2013-end of the life (2).doc; COM 1515\_Eastern Canada Seabird\_e\_03.pdf; Seabird Identification Photo Card2.pdf; Protocol for Collecting Dead Birds from Platforms.pdf

Dear Mr. Hicks:

As requested in your memorandum of 7 May 2013, Environment Canada (EC) has reviewed the report (Environmental Assessment of HMDC's 2D/3D/4D Seismic Projects 2013-Life of Field Newfoundland Offshore Area" (LGL May 2013)). EC's previous comments on the scoping documents (submitted to you on 1 March 2013; attached) are still applicable to the report. In addition, the Canadian Wildlife Service of Environment Canada (EC-CWS) offers the following comments:

#### EC-01, 2.2 Project Description

EC-CWS continues to recommend the implementation of a seabird monitoring protocol for all offshore projects. Although it was originally provided with the EC-CWS comments concerning the guidelines for this project, EC-CWS again provides the CWS monitoring protocol for pelagic seabirds at sea (attached), as well as a guide for pelagic seabirds of Atlantic Canada (attached) for assistance in identifying pelagic seabirds in the area. As is noted in Section 5.8.2 of the environmental assessment, surveys of this nature are typically performed by the Marine Mammal Observer in cases where a dedicated Seabird Observer is not available.

A report of the seabird monitoring program, together with any recommended changes, is to be submitted to EC-CWS on a yearly basis. In an effort to expedite the process of data exchange, EC-CWS recommends that the data (as it relates to migratory birds or Species at Risk) collected from the monitoring program be forwarded in digital format to the EC-CWS office following completion of the study. These data will be centralized for EC-CWS's internal use to help ensure that the best possible natural resource management decisions are made for these species in Newfoundland and Labrador. Metadata will be retained to identify source of data and will not be used for the purpose of publication. EC-CWS will not copy, distribute, loan, lease, sell, or use of this data as part of a value added product or otherwise make the data available to any other party without the prior express written consent.

#### EC-02, 2.3 Mitigations

The pelagic seabird monitoring program recommended in the guidelines and in EC-01 should be added to this section.

#### EC-03, 5.6.3.1 Sound

The protocol of ramping up the airgun prior to use should be listed as a mitigation activity in this section, similar to how it is referenced throughout the previous sections concerning marine mammals. Though this mitigation is referenced as a deterrent for marine mammals, it functions as a similar deterrent for avifauna.

#### EC-04, 5.6.3.2 Vessel Lights

Quote: "Deck lighting can be minimized (if it is safe and practical to do so) to reduce the likelihood of stranding."

EC-CWS recommends changing this to "Deck lighting will be minimized (if it is safe and practical to do so) to reduce the likelihood of stranding."

#### EC-05, 5.6.3.2 Vessel Lights

The section regarding Leach's Storm-Petrel on page 144 should be moved to or referred to in section 5.8.2 (Mitigations).

#### EC-06, 5.6.3.7 Accidental Releases

EC-CWS continues to support the use of solid seismic streamers due to the potential of the release of streamer fluid from liquid-filled seismic streamers. Though potential accidental releases of Isopar M are predicted to be small in magnitude, these releases should still be discussed in the oil spill response plan. Solid streamers do not release sheen-inducing substances, and so are not likely to negatively affect migratory birds.

#### EC-07, 5.6.5 Species at Risk

In addition to the mitigations listed, strandings of Ivory Gull (regardless of injury) should be recorded by the seabird observer and submitted annually with the bird survey data mentioned in section 5.8.2.

#### EC-08, 5.8.2 Seabirds

Quote: "Storm-petrels showing signs of possible oiling must be captured and released as per "Williams and Chardine" protocol."

Any birds contaminated with oil should be kept in a separate box and not mixed with clean birds. Contact the Canadian Wildlife Service at 709-772-5585 for instructions on how to deal with contaminated birds.

#### EC-09, 5.8.2 Seabirds

Quote: "Injured birds: Sabina Wilhelm, Canadian Wildlife Service (709-764-1957 sabina.wilhelm@ec.gc.ca) must be notified and contacted for instructions immediately upon discovery."

The proper contact information for Sabina Wilhelm is (709) 772-5568, sabina.wilhelm@ec.gc.ca.

#### EC-10, 5.8.2 Seabirds

Quote: "Dead Birds: Non-oiled birds found dead or that die before release should be identified, recorded and disposed of at sea."

If more than 10 birds are found dead in the same event, they need to be collected and sent ashore to Canadian Wildlife Service personnel at Environment Canada. Details of how to undertake this are included in the attached protocol designed for handling non-oiled, dead birds (attached).

Please don't hesitate to contact me should you have any questions regarding our comments.

Environmental Stewardship Branch  
Environment Canada  
6 Bruce Street  
Mount Pearl, Newfoundland & Labrador A1N 4T3  
Website [www.ec.gc.ca](http://www.ec.gc.ca)

#### Documents mentioned:

<<EC Response 2013-012 Hibernia Management and Development Company Seismic Program for the Hibernia Oil and Gas Production Field 2013-end of the life (2).doc>>

#### Seabird monitoring protocol:

<<COM 1515\_Eastern Canada Seabird\_e\_03.pdf>>

#### Guide to pelagic seabirds:

<<Seabird Identification Photo Card2.pdf>>

#### Protocol for handling non-oiled dead migratory birds:

<<Protocol for Collecting Dead Birds from Platforms.pdf>>