

Environmental Stewardship Branch
6 Bruce Street
Mount Pearl NF A1N 4T3

June 26, 2007

File No.: 4194-10

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

Dear Ms. Coady:

RE: ConocoPhillips Laurentian Sub-basin Exploration Drilling Program EA Addendum, Offshore NFLD **EAS 2006**

As requested in your letter of May 30, 2007, Environment Canada has reviewed the EA Addendum for the ConocoPhillips Laurentian Subbasin Exploration Drilling Program. From the information provided it is understood that the proponent intends to drill an initial exploratory well and up to 7 exploration/appraisal wells in exploratory licenses 1087, 1081, 1085, and/or 1086 in the Laurentian Channel at the offshore entrance to the Gulf of St. Lawrence. Vertical seismic profiling and geohazard surveys may also be conducted.

The following EC comments stem from the department's mandate under the *Migratory Birds Convention Act* (MBCA) and Section 36 of the *Fisheries Act*. Pertinent EC expertise, and related comments, also originate with the *Canadian Environmental Protection Act* (CEPA), the *Canadian Wildlife Act*, and the *Species at Risk Act* as well as *Department of the Environment Act*.

Comment No. 5 Air Emissions

The reference to the Offshore Waste Treatment Guidelines doesn't help much as they only incorporate a couple of minor reporting requirements for air emissions. However, as long as air emissions are described during the Authorization and Approval process (as indicated), the response is satisfactory. The low NOx, high efficiency engines being required are a good thing, so that requirement is beneficial.

The EA addendum did not address the following comments on greenhouse gases:

Greenhouse Gas Release

An accounting of greenhouse gas (GHG) releases from project activities is absent from the EA. At a minimum, revisions to the EA should provide an inventory of GHG emissions, in equivalent amounts of carbon dioxide, along with a discussion of measures that have been considered and/or are proposed to reduce or monitor GHG emissions. It would also be desirable to include a discussion of emissions in the context of the proponent's operations and of its Voluntary Challenge and Registry (VCR) commitment, if any. If possible, a comparison of the above information with an estimate of the total contribution from the province of Newfoundland and Labrador, as well as that of the industry sector in Canada should be provided.

Guidance on the assessing the effects of GHG emissions on the environment can be found in the document entitled, *Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners* (Federal-Provincial-Territorial Committee on Climate Change and Environmental Assessment, 2003).

Comment No. 6 Well Abandonment

This section states that well abandonment will have no effect on seabirds. While this may be true, there is no evidence presented to show how this conclusion was reached, and this information should be provided.

Comment No. 7 Consultations

For Environment Canada, Martha Robertson should be listed as Environmental Assessment Biologist, not Seabird Biologist, and Jeanette Goulet, Environmental Assessment Officer should be added to the list.

Comment No. 63 Effects of the Environment on the Project

It is unclear the procedure by which a risk assessment would be deemed necessary, or at what stage it should come relative to the EA. However it certainly would be advisable.

The information presented does not make it possible to conclude with confidence that effects of winds and waves on the project would not be significant. For that there would need to be some description of the operating and survivability limits of jack-up platforms and semi-submersible platforms, and those limits would need to be related to the frequency of occurrence of those values. In addition some information would be needed on required lead times to take action to mitigate against effects that could result in pollution releases under various scenarios. There would need to be some assessment of forecast reliability in providing those lead times.

A quick survey of survivability limits available online for semi-submersible platform design for harsh environments give values such as a maximum wave height of 30 to 32 m, wave periods of 11 to 15 seconds, wind speeds (one-minute means at 10 metres) of 55 m/s (107 knots), and current velocity at the surface of about 1.5 m/s (3 knots). These values approach (or reach, in the case of wave period) the 100-yr return period values for the area for waves and wind speed, without commenting on the current.

I trust that this information will be of assistance in your review of this assessment. If you wish to discuss these comments or have further questions, please do not hesitate to contact me at your convenience.

Yours truly,

Original Signed by Glenn Troke

Glenn Troke
Environmental Assessment Coordinator
Environmental Protection Operations Directorate
EPB/NL

Attachment

cc K. Power
B. Jeffrey