



Leslie Harris Centre of Regional Policy and Development

Memorial University of Newfoundland
St. John's, NL CANADA A1C 5S7
Tel: (709) 864-7963 Fax: (709) 864-3734 www.mun.ca/harriscentre

White Rose Extension Project: Public Review Process Report

Prepared for the Canada-Newfoundland and Labrador Offshore Petroleum Board

Keith Storey, PhD
Leslie Harris Centre for Regional Policy and Development
Memorial University, St. John's, NL

September 23, 2014

1.0 Background to the Public Review

Husky Energy intends to develop the western portion of the White Rose field and other potential resources (the White Rose Extension Project, hereafter the WREP), and has submitted an application to do so to the Canada-Newfoundland and Labrador Offshore Petroleum Board (the Board).

The Board is responsible for management and regulation of the petroleum resources in the Canada-Newfoundland and Labrador Offshore Area, pursuant to the Canada-Newfoundland Atlantic Accord Implementation Act, and the Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act (the Acts).

The C-NLOPB, in Decision 2001.01, approved the original White Rose Development Application. The reservoir depletion scheme in the original Development Plan contemplated the exploitation of oil resources in the western portion of the White Rose field. When the application to develop the western portion of the field came forward from Husky Energy, the Board decided that an amendment to the original White Rose Development Plan was required. Furthermore, with the significant benefits arising from the construction of a concrete gravity drilling structure in Argentina, NL, the Board decided that an amendment to the Benefits Plan was also required.

The Acts establish the requirements that proponents of offshore petroleum development projects must fulfill in order to obtain approval for a Development Application, including an amendment. The Development Application is primarily comprised of a Benefits Plan and a Development Plan with supporting documents.

Section 44(1) of the Accord Acts (Federal Version) states that:

44. (1) Subject to any directive issued under subsection 42(1), the Board shall conduct a public review in relation to any potential development of a pool or field unless the Board is of the opinion that the public hearing is not required on any ground the Board considers to be in the public interest.

The Board's interpretation of section 44(1) is described in its Development Plan Guidelines, which indicates that the scale and scope of the public review should be commensurate with the scale of the development and the degree to which new and innovative techniques and approaches are proposed.

The legislation indicates that a public review is to be conducted in relation to any potential development "unless the Board is of the opinion that the public hearing is not required on any ground the Board considers to be in the public interest". Therefore, the legislation contemplates that a public hearing may be necessary for some developments and not for others. In other words, the public review process is best determined on a case-by-case basis.

In respect of this Development Application Amendment, the Board decided that the form of the public review would be a 90-day web-based process, supplemented by public information sessions. It was also determined that the public review process would be conducted by an independent third party. The Leslie Harris Centre of Regional Policy and Development, Memorial University of Newfoundland (The Harris Centre), was selected to lead this process on behalf of the Board. The Harris Centre was to be responsible for the following:

- Establish and promote a website to solicit the public's input on the application;
- Post a description of the project on the website in a format and manner that is suitable for public understanding;
- Conduct public information sessions as may be required to further assist the public in understanding the project; and
- Provide a report within 30 days following the public review period.

This final report would then be considered in the Board staff's analysis of the Application.

The public review focused on four main documents:

- Benefits Plan Amendment
- Development Plan Amendment
- Socio-economic Impact Statement Update
- Wellhead Platform Concept Safety Analysis

The Public Review did not include a review of the environmental assessment of the project as prior to receipt of the Development Application, the WREP underwent a harmonized environmental assessment (EA) process that satisfied the requirements of both the Newfoundland and Labrador Environmental Protection Act and the federal Canadian Environmental Assessment Act (CEAA).

The NL Minister of Environment and Conservation determined on August 21, 2013 that the EA was satisfactory and released the project from further environmental assessment, subject to conditions as published. The C-NLOPB, Fisheries and Oceans Canada, Environment Canada, and Transport Canada, as Responsible Authorities under the CEAA, determined on September 18, 2013 that, following the application of mitigation measure, the WREP was not likely to cause significant adverse environmental effects.

These decisions were based on information provided by Husky Energy in the *White Rose Extension Project Environmental Assessment* and in the company's *Response to Review Comments on the White Rose Extension Project Environmental Assessment*. The latter two documents are intended to fulfill the requirement for an Environmental Impact Statement within the Accord review. This EA process included an opportunity for public comment, and all documents related to this process are posted on the C-NLOPB's website at

(<http://www.cnlopb.nl.ca/environment/whiterose.shtml>).

2.0 The WREP Public Review Website

2.1 Website

A website for the White Rose Extension Project Public Review was established at www.whiteroseconsultation.ca. The site was organized into three main areas to facilitate participation by the public in the review process:

- Get informed by:
 - Reading FAQs about the project, the process and the players;
 - Reading the Project Summary document;
 - Attending an information session; and
 - Viewing a presentation.
- Review the Application documents:
 - Benefits Plan Amendment
 - Development Plan Amendment
 - Socio-economic Impact Statement Update
 - Wellhead Platform Concept Safety Analysis
- Have your say by:
 - Asking a question
 - Commenting on the Application documents
 - Submitting a written submission

Information on the home page of the website also included a brief information video about the project, details of the Public Information Sessions, presentation slides from the information sessions, contact information for the Harris Centre, links to received formal submissions and information on the end date of the Public Review period. Site visitors could also request hard copies of any of the documents under review.

To ensure appropriate use of the site, Terms of Use, Privacy Policy, Moderation, Accessibility and Technical Support details were included on the home page (see <http://whiteroseconsultation.ca>).

2.2 Registration

While anyone could view any of the content on the website, request hard copies of documents or ask a question, those wishing to participate in discussion about the development application amendment documents were asked to register using an email address, a user name and a password. As per the terms of use and privacy policy of the site, users were only ever identified publicly by their user name, which could be a pseudonym.

2.3 Questions

Visitors to the website could ask questions about the project or the regulatory process via a specified form. Questions asked were directed to either Husky or the C-NLOPB, as appropriate, for response. Every effort was made to post an answer to questions asked within three business days. Questions or answers with any private or identifying information were kept private. Participants preferring their question to remain private could also request this. Otherwise all questions and answers of general public interest were posted on the website.

2.4 Comments

Registered users of the website could also provide comments on specific subject matter in the individual documents via discussion, e.g. comments related to employment would typically be made under the Benefits Plan Amendment. Users could also indicate their agreement or otherwise with the posted comments of others.

If comments bridged more than one subject area and document, comments could be cross-referenced, e.g. comments on safety might be cross-referenced in both the Wellhead Platform Concept Safety Analysis and the Development Plan.

All comments were subject to the site terms of use, privacy and moderation policies, which included third party screening for obscene or abusive comments as well as review for relevance. In cases where comments were deemed irrelevant, or out of the scope of the public review process, the site administrators could indicate such in a reply to the comment on the site.

2.5 Website activity summary

In total 4,352 persons visited the website during the consultation period and 501 document downloads occurred. Two interested groups submitted detailed comments and recommendations and there were four comments from private individuals.

Members of the public had the opportunity to ask questions and post comments confidentially. There were two requests for confidentiality with respect to questions, but there were no comments that participants requested be kept private. The private questions and responses have been submitted to the C-NLOPB separately from this report.

3.0 Public Information Sessions

Four Public Information Sessions were held as part of the review process, in Placentia at the Arts Centre on June 24, 2014, at 2 pm and 7 pm, and in St. John's at the Holiday Inn on June 25 at 2 pm and 7pm. The 7pm St. John's session was also

webcast live and an audio recording of that webcast, together with the presentation slides used at the information sessions, were posted on the website.

The sessions were publicized beforehand with newspaper advertisements in *The Telegram* on June 14 and by radio on Steele Communications stations VOXM (AM Station) and K-Rock 97.5 (FM Station). Information about the review process and the Public Information Sessions were also circulated through the Noia daily e-bulletin. A public service announcement on the public information sessions was submitted to the local community channel for the Placentia area.

Each of the Public Information Sessions was scheduled for two hours. The format for each was as follows:

- Welcome, safety moment and housekeeping issues and introduction of session facilitator Keith Storey, by Morgan Murray on behalf of the Harris Centre;
- Outline of the public review process and the role of the Harris Centre, information on accessing and using the website, the purposes of the sessions and introduction of Husky Energy WREP project presented by Keith Storey;
- Overview of the WREP by Richard Pratt, Vice President, Developments, Atlantic Region, Husky Energy and Derek Pearcey, Graving Dock/CGS Project Manager, Husky Energy (their joint presentation lasted approximately one hour);
- Question and answer session, facilitated by Keith Storey with questions responded to by Richard Pratt, Derek Pearcey and other members of the Husky Energy WREP team attending the session; and
- Session closing and reminder by Keith Storey to those participating to submit their comments via the website within the 90-day review period window.

At the conclusion of the formal proceedings for each session Husky Energy representatives made themselves available for further discussion with members of the public.

A record of the questions and comments made at the Public Information Sessions was maintained by Harris Centre staff for subsequent inclusion on the website and in the final report.

Attendance at the sessions was generally light, with 18 and 7 members of the public attending the two Placentia sessions and 37 and 16 people attending the St. John's sessions.

Questions and comments at the Placentia sessions focused primarily on local (i.e., Placentia area) issues, such as employment and business opportunities, traffic concerns and local corporate funding support.

In St. John's, questions and comments were concerned mainly with topsides project employment opportunities, sub-contractor business opportunities, cost and timeline

estimates, offshore personnel transfer arrangements, projected exploration activity levels, and worker training plans.

Concerns and comments from the Public Information Sessions are included in the Summary of Concerns, Comments and Submissions, Section 5.0.

4.0 Ongoing Review Process Publicity

To maximize potential public involvement in the review process email reminders encouraging comments on the project and the application documents under review were sent out on July 23, 2014, to 19 groups/organizations that were considered likely to have an interest in the project. The notice sent read as follows:

Good Day,

This email is to advise that the deadline for comments as part of the public review period for Husky Energy's proposed White Rose Extension Project is **September 10, 2014**.

The 90-day public review period is part of the Canada-Newfoundland and Labrador Offshore Petroleum Board (CNLOPB) review of the proposed White Rose Extension Project and this is being coordinated by the Leslie Harris Centre of Regional Policy and Development at Memorial University. Your input and comments are welcome. To learn more about the proposed project, review the application documents and to have your say, please visit www.whiteroseconsultation.ca. All comments must be received by **September 10, 2014**.

Please feel free to forward this message to your membership, affiliate organizations or others that you believe may have an interest in the proposed project.

Regards,
Dr. Keith Storey,
Chair, Public Review Process
Harris Centre

A second, similar, email reminder was sent out to 17 of the 19 groups/organizations on August 28, 2014¹, emphasizing the closing date for comments and submissions. In addition:

¹ One group made a submission in the intervening time period, the email address for another was inactive and no alternative address could be found.

- The WREP website was updated on August 27 2014 to highlight the end of the consultation period on September 10 2014;
- An advertisement ran in the *Telegram* September 3, advising of the end date of the consultation period;
- NOIA circulated information about the end of the consultation period on September 8, 2014 through its daily ebuletin; and
- A public service announcement drawing attention to the end of the consultation process was submitted to the community cable channel for the Placentia area.

5.0 Summary of Concerns Comments and Submissions

5.1 Introduction

Concerns, comments and submissions posted on the website are organized here by relevance to primary document, e.g., Benefits Plan Amendment, Socio-economic Impact Statement Update, etc., and by theme, e.g. business, employment issues, etc.

Some questions asked at the public information sessions that expressed no particular concern, but were asked purely to acquire additional information, are not included in this summary. It should be noted that this is a *summary* of concerns and submissions. Readers are encouraged to access the concerns comments and submissions, and in some cases responses, as presented on the website for further details.

Concerns, comments and submissions by document relevance and theme are summarized below with the source (where self-identified) of the concern/comment indicated:

5.2 Benefits Plan Amendment

5.2.1 Business Concerns

5.2.1.1 Technology Transfer and Research and Development

The Benefits Plan Guidelines anticipate continuous improvement in technology transfer and research and development. In the original White Rose Benefits Plan Husky stated that it would develop strategies to achieve its objectives in this regard. Noia recommends that the C-NLOPB require Husky to provide information on these strategies, including the objectives, progress, measurement metrics employed and how this commitment has addressed the expectation for continuous improvement. (Noia)

5.2.1.2 Supply Constraints

The Benefits Plan Amendment is seen as providing adequate information on supply opportunities in both the construction and operations phases of the project, but does not fully address constraints. Noia recommends that the C-NLOPB require Husky to provide further information on supply constraints. (Noia)

5.2.1.3 National and International Business Participation

The proponent is expected to have programs, policies or procedures to enable Newfoundland and Labrador and other Canadian suppliers to participate in the proponent's national and international activities. The amendment does not specifically address this expectation and Noia recommends that the C-NLOPB require it to be specifically addressed within a program with clearly defined objectives. (Noia)

5.2.1.4 Canada-Newfoundland Benefits as an Evaluation Criterion

Husky states Canada-Newfoundland Benefits will be a factor in awarding all contracts. Noia strongly supports Husky's use of the evaluation criteria (supplier development, research and development (R & D), and technology transfer, NL content and person-hours, ownership and training) for Canada-NL benefits and is interested in how the evaluation has influenced results.

The proponent is also expected to have plans for transfer of technology and "know-how" to Newfoundland and Labrador and other Canadian suppliers and contractors. Husky has clearly expressed its belief in the value of technology transfer and has outlined the requirement for contractors and that bidders will be rewarded for proposals that detail innovative initiatives, strategies and methods for transfer of technology. Noia is supportive of Husky in this and believes that effective technology transfer can produce positive results.

Noia recommends the C-NLOPB require that Husky demonstrate how the evaluation criterion has contributed to achieving positive and measurable results for Canada-NL Benefits. (Noia)

5.2.1.5 International Competitiveness

The C-NLOPB encourages offshore proponents to undertake initiatives that will assist business firms in the province to become internationally competitive in the offshore oil and gas industry. Husky states that it *'provides support and assistance to bidders through early notification of program requirements and specification and encouragement of Newfoundland and Labrador suppliers to become globally competitive – including the provision of technical assistance and advice where necessary'*. Noia supports and encourages Husky to continue with this initiative and recommends that the C-NLOPB require Husky to describe how encouragement,

technical assistance and advice will be provided for the WREP. (Noia)

5.2.1.6 Newfoundland and Labrador Fabrication, Outfitting and Other Commitments

Section 3.0 of the Benefits Plan Amendment, states that *'This Benefits Plan Amendment also takes into consideration the 2013 White Rose Expansion Project Framework Amending Agreement with the Government of Newfoundland and Labrador'*, but does not detail the commitment (packages) for mechanical fabrication and mechanical outfitting in Newfoundland and Labrador or other aspects of the commitments such as for the additional sub-sea facilities, infrastructure and temporary works and detailed and construction engineering. Noia recommends that the C-NLOPB require Husky to provide detail on all the NL commitments in the 2013 Amending Agreement in Table 5.1 and that these be identified for NL only. (Noia)

5.2.1.7 Integrated Drilling And Utilities Module

Information on the Integrated Drilling and Utilities Module (bid internationally as per the Amending Agreement) is absent from Table 5.1 and Noia recommends that the C- NLOPB require Husky to include this information. (Noia)

5.2.1.8 Global Frame Agreements

Noia is concerned about the use of global frame agreements and the potential impact on local supply, in particular during the operations phase. In this regard Noia recommends that the C-NLOPB require Husky to identify its plans for the control of this type of agreement and encourage Husky to not use frame agreements that would negatively impact local suppliers. (Noia)

5.2.1.9 Employment and Business Diversity

Husky believes that an effective employment and business diversity strategy is important to the successful development of the Newfoundland and Labrador offshore oil and gas industry. Noia is supportive of this belief and commends Husky on its Diversity Plan and goals for the access of designated groups to employment and training on the Project.

Noia is also supportive of supplier diversity and recommends that the C-NLOPB require Husky to include special measures to facilitate the increased and measurable participation of under-represented groups in procurement for the project in both the development and operational phases. (Noia)

5.2.1.10 Small Company Participation

Noia is concerned that opportunities for smaller companies to participate in the project are limited unless measures are undertaken.

Noia recommends that the CNLOPB require Husky to develop special proactive measures including policies or procedures for sub-contracting to facilitate the increased participation of small companies in procurement for the project in both the development and operational phases. (Noia)

5.2.1.11 Business Targets for Women

The Business Access portion of the Diversity Plan is seen to require more information on how women and other designated groups might access business opportunities from the Project. Questions posed include:

- How does the Project plan on achieving the business access piece for women?
- What will constitute a woman or women owned/controlled business?
- Will there be a certification process?
- What targeted and proactive measures will be taken to ensure women specifically are aware of business opportunities and how to competitively access them?

The Provincial Advisory Council on the Status of Women (PACSW) strongly recommends targets for business access for women. Husky is encouraged to review the Hebron Supplier Diversity Program in this regard.

Elements of a Business Access plan, specific to women, would include:

- The opportunity for women-owned businesses to self-identify;
- A certification program for women-owned businesses in line with national certification programs;
- Identification of where current business access exists;
- Communication of information on supply and procurement opportunities;
- Identification of possible barriers in the procurement program that limit potential participation; and
- Development of a business access strategy that provides a fully equitable supplier and procurement process.

It was also recommended that the business access strategy proposed to provide an equitable supplier and procurement program would include the following information:

- Positive policies and practices, including setting targets, raising awareness, training procurement officers and providing other supplier development supports for women and other designated groups to ensure their participation and benefits from supply and procurement;
- The identification of other aggressive and proactive measures to remove supply and procurement barriers for women-owned businesses and other designated groups;
- The identification of timetables and goals that are sufficient to achieve

reasonable progress towards a representative supplier clientele for the project;

- A commitment and demonstration to continuous improvement;
- A commitment to and a demonstration of reasonable efforts to implement its plan and monitor, review, and revise its plan on an annual basis, including the assigning of responsibilities for this goal, and
- A commitment to prepare an annual public report by designated group that would include a report on the achievement of targets by procurement categories.

Initiatives, such as consulting with the Newfoundland and Labrador Association of Women Entrepreneurs and other local business networks are supported and encouraged. (PACSW)

5.2.1.12 Management and Maintenance of the Graving Dock

Noia believes that the new Graving Dock is a critical piece of infrastructure that can and should play an important and diverse role in the future. In this regard, Noia recommends that the C-NLOPB ask Husky to provide detail on what will remain at the site after construction of the CGS is complete. As well, Noia is concerned about the uncertainty regarding the future management and maintenance of the facility and recommends that the C-NLOPB ask Husky to provide greater definition on its future management and maintenance. (Noia)

A similar question was asked at the Placentia Information Sessions.

How will the dry dock or other project infrastructure help the long-term future of the Placentia area? Who will own the dry dock in the future?

Husky responded to this question as follows:

- Husky leases the CGS site from the Argientia Management Authority, but it would be premature to speculate on long-term use of the site at this point in the project.
- The reusable dock gates represent a significant up-front investment, and will allow for the future use of the site.

5.2.1.13 Bid Process for the CGS Contract

A participant at the St. John's Information Sessions, and later through the website, considered that there was a failure by CGS bidders to fully engage the supply community during the bidding stages. He recommended that the successful CGS bidder undertake a more exhaustive supplier development process to explain contracts and engage suppliers one-on-one. (R. Strong)

5.2.1.14 Business Opportunities for the Placentia Area

Several participants at the Placentia Information Sessions were concerned about the capture of local area benefits from the Project as follows:

- How does project information come to Placentia and surrounding towns?
- Some thirty companies are now supplying various things to the project. How can Placentia area companies take best advantage of such opportunities?
- What encouragement can we in the Placentia area expect from Husky to ensure that Placentia benefits from the project?
- How can we get the opportunity to provide services to those companies?
- How do we get information about contractors that will be working on the project in the Placentia area?

Husky Energy responded as follows:

- Project information is available at <http://wrep.huskyenergy.com>, at events such as the Placentia Bay Industrial Showcase, and the project Information Office at the Placentia Mall;
- The best way to stay involved and take advantage of all opportunities is to reach out to companies listed on the website and stay informed through supplier information sessions;
- Husky Energy cannot direct companies to use Placentia area suppliers. The Atlantic Accord has specific requirements regarding the provision of full and fair opportunity to businesses throughout Newfoundland and Labrador, not just those in the Placentia area. Husky encourages all businesses in the Placentia area to contact the prospective CGS contractors and to attend upcoming supplier information events.
- Potential suppliers should review the website to understand the main project contracts, and how they can fit into the supply chain.
- Husky's website is the best source of information for the project, and major contract award information is distributed through the Noia newsletter.

5.2.1.15 Helicopter Services

A participant at the St. John's Information Sessions wanted to know which company would provide helicopter services to the platform, the type of helicopter to be used and whether there would be any pooling of helicopter transportation with other offshore companies.

Husky responded as follows:

- The bidding process for a helicopter transportation provider is ongoing. The type of airframe and whether or not there would be pooling is yet to be determined.

5.2.1.16 Cost Overruns

A participant at the St. John's Information Sessions asked if the original projected costs for the project had changed and how cost pressures might be mitigated in the future.

Husky responded as follows:

- Bids for major contracts are still being examined and projected versus actual costs cannot be commented on at this time;
- Husky is well aware of the cost pressures on a project of this scale, which is why careful planning and execution are so important.

5.2.1.17 Use of the *West Mira* Drilling Unit

A participant at the St. John's Information Sessions wanted to know if the use of the West Mira drilling unit would mean a decrease in the use of older drilling units currently in use offshore.

Husky responded as follows:

- When it arrives, the *West Mira* will become the primary mobile offshore drilling unit for our operations in the region, but we may also contract additional drilling capacity as required;
- At present, the contract with the Henry Goodrich is scheduled to expire early 2015, and the contract for the GSF Grand Banks is scheduled to finish in September 2015.
- Future drilling contracts will be based on our anticipated drilling requirements, potential rig share opportunities, and the availability of drilling units, which are suitable for our offshore operating conditions.

5.2.2 *Employment Concerns*

The Provincial Advisory Council on the Status of Women noted that they are encouraged by Husky's commitment to: endeavouring to provide women, Aboriginal people and people with disabilities, an inclusive and culturally sensitive work environment; provide opportunities to advance their careers; provide assistance to employees in balancing the responsibilities of career and family life; and ensuring that the recruitment and selection process supports diversity. (PACSW)

5.2.2.1 Employment of Women - General

A low/zero representation of women in many occupational categories (e.g. marine crews, technicians/technologists) is noted. Recognition is given to the fact that there have been increases in some areas, but that there is still work to be done to increase the employment of women in the White Rose Project labour force during both the construction and operations phases. (PACSW)

5.2.2.2 Employment Targets for Women

Targets for employment of women are in part based on outdated information (2006 NOC code data). Targets based on outdated information are considered to help perpetuate women's low (or lack of) participation in many relevant occupational categories.

That said, targets were also based on recent labour market outlook views, which recognize the potential role of under-represented groups, including women, in helping meet future labour demands, on more recent data on achievements in provincial professional and vocational training programs and on information from agencies and groups representing women's interests. These perspectives and achievements need to be considered when developing realistic targets for women.

While targets have been established for the construction phase, PACSW recommends that targets also be established for the operational phase. (PACSW)

5.2.2.3 Offshore Apprentice Program

Providing an offshore apprentice program for women is seen as helping break down barriers they face where trying to gain experience offshore. This is seen by PACSW as a very positive commitment by Husky. (PACSW)

5.2.2.4 Newfoundland and Labrador Workforce Opportunities

The Business Manager of UA Local 740 Plumbers and Pipefitters expressed concern both at the Information Sessions and on the website about the small amount of topsides work being undertaken within the province and whether mating, hook-up and commissioning would utilize local workers.

Husky responded to the questions posed at the Information Sessions as follows:

- There were no yards available in the province at which to build the integrated module.
- The work was bid both internationally and in Newfoundland and Labrador so that any company wanting to compete for the work could do so.
- To maximize potential NL content certain components of the module were broken out for fabrication in the province.
- The crew in the field mating the topside with the CGS is expected to be made up mainly of the eventual full-time crew for the platform, of whom approximately 90% are anticipated to be Newfoundlanders and Labradoreans.

5.2.2.5 Training Programs

A participant at the Placentia Information Sessions asked if there would be training programs at existing facilities in the Placentia area or if new centres would be established.

Husky responded as follows:

The training programs are something that will be worked on with the CGS contractor. The training programs are meant to help meet the immediate needs of the project through the local workforce, so until a contractor is selected, it is difficult to determine what those needs may be. In any event, it is expected that existing facilities would be utilized, if possible.

5.3 Development Plan Amendment

5.3.1 Produced Gas

A participant at the St. John's Information Sessions asked how much gas would be produced and if that gas would be re-injected.

Husky responded as follows:

- 20 of the 38 wells will be oil producers. At this time, gas will be re-injected to enhance oil recovery and will also be used as a fuel source for the platform. Natural gas development is very important to Husky, but it is not the focus of the White Rose Extension Project.

5.3.2 Decommissioning

A participant at the St. John's Information Sessions asked if a Decommissioning Plan was required as part of the approval process.

Husky responded as follows:

- Our design incorporates the ability to decommission the facility.

5.4 Socio-economic Impact Statement Update

5.4.1 Social Concerns

5.4.1.1 Road Transportation

Three participants at the Placentia Information Sessions were concerned about impacts of traffic on the Placentia area:

How do you intend to access the construction site at the Base? Will you be using the Dunville Road or are you considering building a separate road?

Have you done any studies, or do you plan to do any studies on the impact that the project will have on traffic in the area, particularly the Dunville road? Is there anything that can be done to mitigate traffic effects?

There is going to be a lot of traffic in and out of the construction site and the roads here are pretty bad. Are you going to be involved in any road works?

Husky Energy responded to these as follows:

- The Dunville Road will be used.
- No traffic studies have been done or are planned.
- The traffic situation in Dunville will be monitored.
- Husky Energy does not fund municipal infrastructure.

5.4.1.2 Childcare

When working or re-entering the workforce women often have difficulty obtaining affordable, reliable and flexible childcare options. Husky's commitment to collaborate with the Department of Child, Youth and Family Services in identifying an appropriate non-profit group to provide funding to explore child care issues of those working on large construction projects and possible responses is strongly supported by PACSW. (PACSW)

5.4.1.3 Support for Non-profit Organizations

A participant at the Placentia Information Sessions asked what help Husky is able to offer local non-profit organizations.

Husky responded as follows:

- Every year, Husky supports a number of charitable and community initiatives in the areas where we live and operate.
- Our funding priorities for community investment focus on health, education and community initiatives.
- <http://www.huskyenergy.com/socialresponsibility/communityinvestment/default.asp> provides organizations with all the information on what we do (and don't) fund, as well as the online application to apply for funding.

5.5 Wellhead Platform Concept Safety Analysis

There were no concerns or submissions relating to this document.