

**1. Fisheries and Oceans Canada Original Comment:**

Section 1.2 Proposed Project modifications (page 5) Section 2.2 Planned Activities for 2016 (page 8) and Section 2.3.2 Increased Number of Wells (page 10) – Further to comments provided on January 15, 2015 arising from review of the Statoil EA Update for 2016 the proponent should indicate the probable drilling / well locations planned for 2016 – 2019 especially whether or not any such wells will be located within or near any of the NAFO Vulnerable Marine Ecosystem (VME) areas or other sensitive marine areas depicted in Appendix A – Figure 1.

**Statoil Response (December 14, 2016):**

The specifics of a drilling program for 2017, or subsequent years cannot be provided as a drilling program has not been planned. However, when locations are decided, per C-NLOPB requirements, pre-spud video surveys are undertaken to determine if the well location falls within 100 m of a *Lophelia pertusa* complex. In the event there are *L. pertusa* within 100 m of the well site, the well location will be moved. These pre-spud video surveys are always undertaken irrespective of the wellsite proximity to a VME or other sensitive marine area.

**DFO Reply (February 7, 2017)**

The response provided has not fully addressed our comment. More specifically “...whether or not any such wells will be located within or near any of the NAFO Vulnerable Marine Ecosystem (VME) areas or other sensitive marine areas.” While it is accepted that at this point in time it may be difficult to identify well locations for the planned program it is felt that an indication of whether any planned wells will be located within or near existing VMEs and/or EBSAs will be provided within subsequent annual EA updates. This type of notification was included in the 2010, 2011, 2012, 2014 and 2015 annual updates submitted for the previous program EA.

**Statoil Response**

Environmental assessments, and amendments to the EA, address project activities in a more general manner. When EA or amendments are prepared, planning for particular activities may not be finalized, and hence the activities are assessed as being carried out at any location in the Project Area. To provide more detailed information on planned activities for any given year and to ensure that these proposed activities have been assessed within the scope of the existing EA, the C-NLOPB requires that operators submit an annual environmental assessment (EA) update. Statoil will be submitting an EA update to the C-NLOPB that will provide more detailed information regarding drilling plans for 2017. This EA update will identify potential well locations and their proximity to NAFO Vulnerable Marine Ecosystem (VME) areas.

**2. Fisheries and Oceans Canada Original Comment:**

Section 4.1 Focus and Findings of the Original Environmental Assessment (page 20) – this section should provide; a summary description of VMEs and sensitive marine areas within the project area, an indication whether drilling activities have / or will occur within or near such areas, and mitigation measures that will be implemented to protect such areas.

**Statoil Response (December 14, 2016):**

The following text has is included under Section 3.6 Sensitive and Special Areas in the EA Amendment. The references, cited below, have been included in the reference section of the EA Amendment. (Text provided in December 2016 has not been repeated here).

**DFO Response (February 7, 2017)**

While the response and the revised section in the December 2016 EA Amendment provide a very good summary description of VMEs and sensitive marine areas within the project area, the response / description has not fully addressed our comment. More specifically there has been no "...indication whether drilling activities have occurred within or near such areas". To fully address our previous comment, it is felt that wellhead location information presented in Figure 2 (page 6 December 2016 EA Amendment) should be included within Figure 3 Location of Special / Sensitive Areas in Relation to Project Area (page 17 December 2016 EA Amendment).

**Statoil Response:**

The following figure replaces Figure 3 in the EA amendment. It identifies the wells drilled by Statoil and the locations of wells decommissioned in 2016.

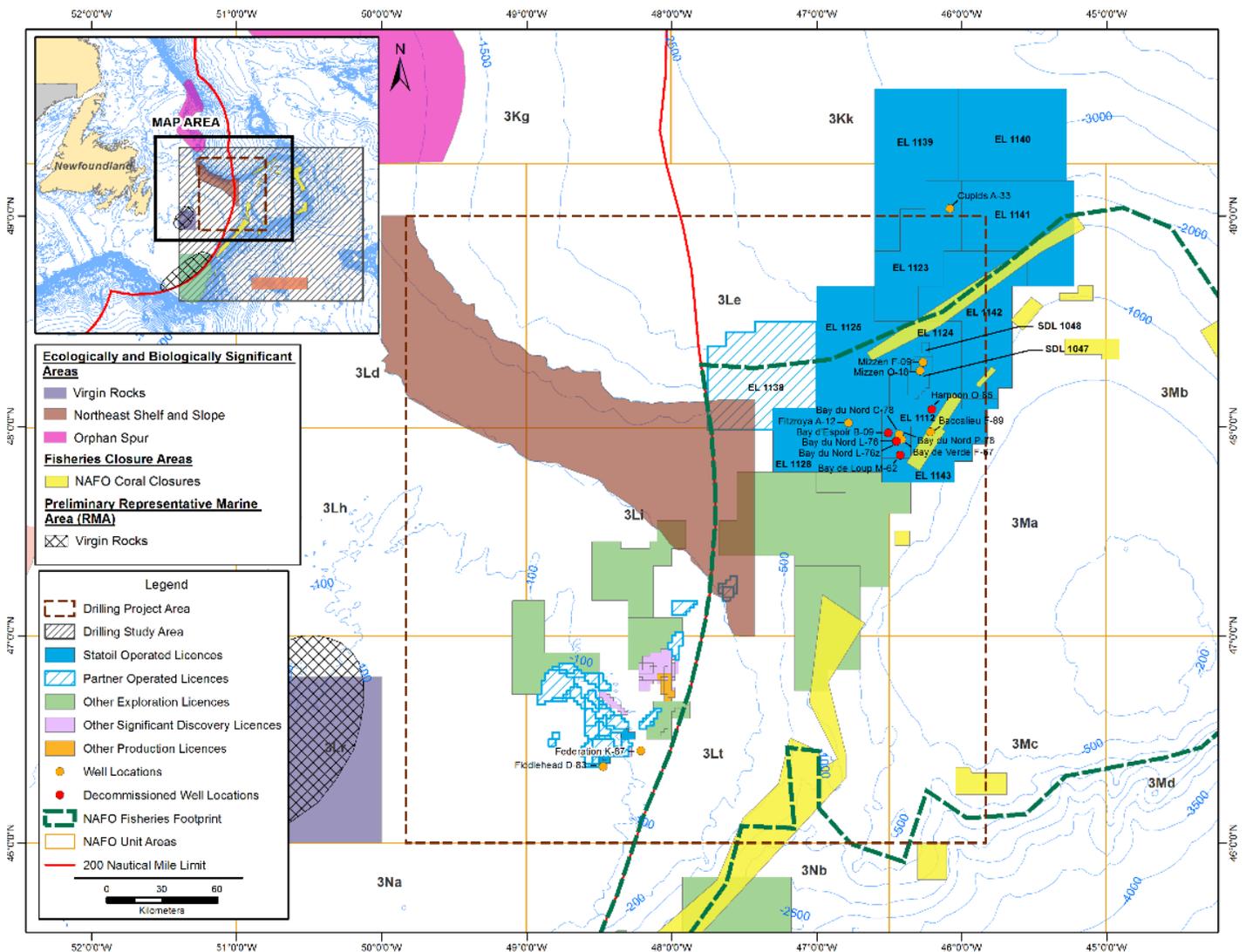


Figure 3: Location of Special Sensitive Areas in Relation to Project Area

**3. Fisheries and Oceans Canada Comment:**

Section 4.1 Focus and Findings of the Original Environmental Assessment (page 20) – 2nd bullet Last paragraph indicates that project mitigation procedures include “pre and post drilling ROV surveys” it should be noted what the results of such surveys have been, and whether they provide information to validate impact predictions made within the original EA and the assessment of effects relative to the expansion of drilling activity by Statoil presented within the 2016 EA Amendment.

**Statoil Response:**

Pre-spud ROV video surveys are undertaken to determine if there are any visible hazards to drilling at the drill site and to determine whether corals, specifically *Lophelia pertusa* are present in proximity to the wellsite. Post RoV surveys are undertaken to determine if any debris remains at the wellsite and to inspect the wellhead before the drilling unit leaves the location, if the wellhead is not removed at that time. In terms of the mitigations identified, it is primarily for the pre-spud video survey to determine presence of corals and if the well site should be moved as a mitigation to reduce potential effects on corals. Because they are used to determine presence-absence of corals, the data is not particularly useful to validate impact predictions. However, the data can be used in subsequent environmental assessments to provide more information on the location of corals in the area.

**DFO Reply (February 7, 2017):**

The response has addressed our comment. While the response indicates that “...the data can be used in subsequent environmental assessment to provide more information on the location of corals in the area...”, there is no such information provided in Section 3.1 of the December 2016 EA Amendment. This should be clarified and corrected if necessary.

**Statoil Response:**

Regarding the information from pre-spud ROV video surveys, it was intended to provide that information in subsequent environmental assessments, not in the EA amendment. The EA amendment addresses a temporal change in scope of a standing EA and an increase in the likely number of wells that could be drilled during the scope of the project. For the purposes of the EA amendment, there was no change in the determination of significance regarding potential impacts on fish habitat therefore the data provided in the ROV surveys was not included.