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June 13, 2013

Canada-Newfoundland and Labrador Offshore Petroleum Board
Fifth Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6

Attention: Darren Hicks, Environmental Analyst

Dear Mr. Hicks:

RE: Chevron Canada Limited Orphan Basin Exploration Drilling Program Environmental Assessment: 2013/14 EA Validation Report

In regards to the comments received by the C-NLOPB on Chevron Canada Limited's (Chevron) *Orphan Basin Exploration Drilling Program Environmental Assessment: 2013/14 Environmental Assessment (EA) Validation Report*, Chevron offers the following response for your consideration:

General Comments

Comment:

There are instances of lack of diligence to ensure accuracy throughout the document. For example Table 2.1 lists wells to be drilled in "2012" and not "2013/2014". Table 2.2 states that galley waste will be "skipped" to shore. Please review for accuracy.

Response:

The inaccuracies pointed out by the reviewer are noted. However, these inaccuracies do not cause a material change to the validation document.

Comment:

In the discussion of doing Vertical Seismic Profiling the use of Fisheries Liaison Officers and Marine Mammal Observers is being pointed as a mitigation effort (table 2.2). There has been no approach or discussion to this effect with the FFAW. Further, as the proponent has expressed the wish to extend the temporal scope to March 2014 – this again has not been brought up in any consultation effort.

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Response:

Consultations were conducted prior to submission of the EA Validation document. Section 2.2 of the EA Validation document outlines the consultations which were conducted, and indicates that all relevant material was sent to the FFAW for its review.

Specific Comments

Section 2.0, 1st para., line 2, pg 5 – *"The initial phase of the well will be commenced during March of 2013". The date of the report is April 2013 and one of the purposes of the Validation Report is to inform of activities that are "proposed" for the 2013/2014 timeframe. The details of the March 2013 activity, including the ROV survey, should also be described. Please review and update accordingly.*

Response:

The temporal inconsistency pointed out by the reviewer is noted. However, this inconsistency does not cause a material change to the validation document. The initial activity at the Margaree A-49 well site has been addressed within the EA validation document.

Section 2.0, 3rd para., line 5, pg 5 – *"The boundary of EL 1074R now represents the Project Area for this validation document". Please confirm that this boundary falls within the boundary of the Project Area delineated in the 2005 EA Report.*

Response:

The boundary changes for the Project Area were addressed in the *EA Update* document prepared in 2012.

Section 2.0, Table 2.1, line 3, pg 5 – *Please identify the approximate timeframe for the 2nd phase (testing activities).*

Response:

In the event of a discovery, Chevron proposes to suspend the Margaree A-49 well and return at a later date to conduct a well test, as soon as a suitable drilling vessel and test package can be arranged, installed and inspected by the Certifying Authority. This would require a minimum of one year planning and lead time once a well test is designed for this specific wellbore.

Section 2.1.1, last bullet, pg 6 – *Please identify what is meant by "timely fashion". The timing for submission of reports should be identified.*

Response:

As per the C-NLOPB/C-NSOPB Guideline for the Reporting and Investigation of Incidents, damaged fishing gear attributable to the project will be reported **immediately**.

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Section 3.1.1, last para., last line, pg 11 – *"There is general consensus among scientific communities that Greenhouse gas emissions have played a significant role in climate change over the past 50 years". Please provide references.*

Response:

General references associated with the effects of greenhouse gas emissions on climate change are too numerous to list, although two sources of such information include the following:

NRC. 2010. *Advancing the Science of Climate Change*. National Research Council. The National Academies Press, Washington, DC, USA

A United States Environmental Protection Agency (US EPA) website also contains a great deal of information on this issue: <http://www.epa.gov/climatechange/science/causes.html>

Should you have any questions or require further clarification in this regard, please contact me either by phone at 403-234-5194, or by email at jennifer.wyatt@chevron.com.

Sincerely,

<original signed>

Jennifer Wyatt
Environmental Specialist