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BAB 3970-200

Ms. Kimberly A. Coady
Environmental Assessment Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's NL A1C 6H6

RE: PDI Production Inc. Port au Port Exploration Drilling Program Environmental Assessment Report

Dear Ms. Coady:

Thank you for the opportunity to review and provide comments on your document, entitled "*Port au Port Bay Exploration Drilling Program Environmental Assessment."*

DFO understands that the environmental assessment report covers the drilling of a single well that will be drilled onshore and deviated to an offshore target. This program is to commence sometime in the fall or winter of 2007/2008 and take approximately 90 to 120 days to complete. It is further understood that since the proposed project is a land-based drilling program designed to enter a target in the offshore area, the only potential impact to the marine environment under the jurisdiction of the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB), is from an accidental event. Therefore, the scope of our assessment focuses on the project-environment interactions associated with hydrocarbons entering the marine environment from accidental events. The following comments on the EA document are provided for your consideration.

Section 4.3.1, Page 29: The figure presented gives a typical summer surface circulation pattern. This information is not relevant as the project is scheduled to take place in fall and winter. Circulation patterns appropriate for the project timeline should be presented instead.

Section 5.1.1 Marine Ecosystem: The descriptions of the marine ecosystem provided focus mainly on commercially important fish and invertebrate species, and are based on landings data (which would not give the location of capture) and on stock assessment information, much of which is outside of the Port au Port Bay area. This represents a data/knowledge gap for the area in terms of allowing an adequate assessment of the potential impacts of accidental release of hydrocarbons. At the very least these data gaps should be identified in a separate section of the report and the resultant limitations of the effects assessment acknowledged.

Section 5.1.3.1, Page 110: The statement: "*Currently, there are no recovery strategies, action plans, or management plans in place for species under Schedule 1 and known to occur in the Study Area*" is incorrect. Wolffish (spotted and northern) occur in the area, are on Schedule 1 of SARA and have recovery plans as stated on page 116. A recovery strategy for Leatherback Turtles (Atlantic population) is also on the SAR Public Registry, as is a management plan for

Striped wolffish. The proponent should refer to these recovery strategies/plans to ensure that proposed mitigation is consistent with these documents.

Table 5.15, Page 111: While Atlantic cod in general is listed on Schedule 3 of SARA, the Newfoundland and Labrador population is not on any SARA schedule and currently has no status under SARA. The species was considered a single unit and assigned a status of *Special Concern* in April 1998. However, the species was split into separate populations for consideration in May 2003. Please refer to the species profile on the SARA Registry for further explanation.

Section 5.2, Notable Areas: There is no reference in the report to the Community-based Coastal Resource Inventory (CCRI). This database is an important source of qualitative biological information for many coastal marine areas, including Port au Port Bay. The proponent should access the CCRI database at the following website: http://public.geoportal-geoportail.gc.ca/publicGeoBrowser/public/GeoPortalBrowser.jsp and reference relevant information to Port au Port Bay in the EA.

DFO recently released a report on ecologically and biologically significant areas in the Gulf of St. Lawrence: DFO, 2006. Ecologically and Biologically Significant Areas (EBSA) in the Estuary and Gulf of St. Lawrence: identification and characterization. DFO Can. Sci. Advis. Sec., Sci. Adv. Rep. 2007/016. (http://www.dfo-mpo.gc.ca/csas/Csas/status/2007/SAR-AS2007_016_E.pdf). One of these areas is adjacent to the study area and should be noted in the document and in the potential impacts assessment.

Section 8.4.2.3, Oil Spill Trajectory Modeling-General Model Results, Page 178: It is concluded that the likelihood of accidentally released hydrocarbons moving beyond the northern boundary of the study area is negligible. There are potentially other factors besides the prevailing winds that could influence surface currents and the movement of oil beyond the study area. Some of these are described earlier in the report (section 4.3, Physical Oceanography). It is recommended that these factors be considered or addressed in the modeling carried out in relation to this aspect.

If you have any questions or comments regarding the above, please do not hesitate to contact Habitat Biologist Randy Power by phone at 772-8888, or by e-mail (powerrg@dfo-mpo.gc.ca).

Yours sincerely,

Original Signed By

Tilman Bieger
A/Division Manager
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