

PDI Production Inc. – Port au Port Onshore to Offshore Drilling Program
Scoping Document Review Comments

1. Demonstration of provisions for ensuring compliance with environmental protection legislation, and federal environmental policy statements should be described in the environmental assessment (EA), as applicable (e.g., Appendix 1). The assessment of potential impacts and identification of necessary mitigation and follow-up could be focused accordingly.
2. The EA should clearly describe the location of proposed activities, including figures and maps where appropriate.
3. Additional Information on Fisheries in the area of proposed activity..

American Plaice

4Rc –

SHAG ISLAND TO CAPE ST. GREGORY July 15, 2006 September 30, 2006

Cod Fishery

July Fishery

JULY 10, 2006

JULY 25, 2006

September Fishery

SEPTEMBER 5, 2006 SEPTEMBER 8, 2006

October Fishery

October 16, 2006 October 31, 2006

Lump

4Rd North –

JOHNSON'S COVE TO CAPE ST. GEORGE MAY 15, 2006 JUNE 3, 2006

4Rc –

CAPE ST. GEORGE TO CAPE ST. GREGORY MAY 15, 2006 JUNE 3, 2006

Skate

4Rc – <125 fathoms

CAPE ST. GEORGE TO LONG PT. July 7, 2006 September 30, 2006

4Rc – <125 fathoms

LONG PT. TO BLUFF HEAD July 7, 2006 September 30, 2006

Winter Flounder

4Rd –

BANK HEAD, BSG TO CAPE ST. GEORGE July 21, 2006 September 30, 2006

Witch Flounder

4Rd –

CAPE RAY TO CAPE ST. GEORGE May 20, 2006 SEPTEMBER 16, 2006

Lobster:

LFA 13B 250 pots

APRIL 22, 2006

JULY 4, 2006

Scallop:

FA13

– Cape Ray to Cape St. Gregory

June 1, 2006 December 31, 2006

FA13

- Long Point to Broad Cove, Port au Port Bay

July 7, 2006

Crab:

Snow: Crab Fishing Area 12

APRIL 5, 2006 JUNE 30, 2006

Rock Crab

HANDLED BY RHQ

4. The Port au Port Peninsula is an important area for migratory birds. There are two very large Black-legged Kittiwake colonies on the southwestern tip of the peninsula. These colonies lie in the Garden Hill South discovery. There are a number of additional Gull and Tern colonies on the peninsula. A Piping Plover (Endangered) was sighted at Piccadilly Beach in 2005. There have also been recent (2005) reports to CWS from the public suggesting that gannets may be nesting in the study area. For the Shoal Point area, up to date information on these groups should be included in the EA.
5. The project description indicates that an exploration well will be drilled on the Shoal Point Peninsula, an area that is primarily wetland. As part of its commitment to wetlands conservation, the Federal Government has adopted *The Federal Policy on Wetland Conservation* (FPWC) with its objective to “promote the conservation of Canada’s wetlands to sustain their ecological and socio-economic functions, now and in the future.” In support of this objective, the Federal Government strives for the goal of No Net Loss of wetland function on federal lands or when federal funding is provided. CWS recommends that the goals of the policy be considered in wetland areas, and we recommend that the hierarchical sequence of mitigation alternatives (avoidance, minimization, and as a last resort, compensation) recommended in FPWC is followed. Avoidance refers to elimination of adverse effects on wetland functions, by altering the siting or modifying the design of a project, and is the preferred option. A copy of the FPWC can be found at: <http://dsp-psd.communication.gc.ca/Collection/CW66-116-1991E.pdf>
6. For bird species, mitigation measures related to adverse effects, including cumulative effects, should be identified in the EA. Measures should be consistent with the *Migratory Bird Convention Act* and SARA and with applicable wildlife management plans, recovery strategies and action plans. Mitigation should reflect a clear priority on impact avoidance opportunities. The following specific measures should be among those which are considered in preparing a mitigation strategy:
 - Do not enter the colony from the land. Entering the colony will result in the destruction or abandonment of nests.
 - When working near the colony (within 500 m), have a biologist monitor the activity of the colony to assess whether the colony is being repeatedly disturbed. Cease activity if the colony is being repeatedly disturbed
 - Similar actions should be taken if a nesting northern gannets are discovered.

7. **Management of Hazardous Materials and Waste**

In order to ensure compliance with Section 36 (3) of the *Fisheries Act* and with the *Migratory Birds Convention Act* and their Regulations, provisions for the management of hazardous materials (e.g., fuels, lubricants) and wastes (e.g., waste oil) should be identified and implemented so as to ensure the risk of chronic and accidental releases is minimized. It is therefore, recommended that all necessary precautions be undertaken to prevent a fuel spill from occurring, as even small spills can have deleterious effects. The following mitigations are offered as suggestions which, when employed, may minimize impacts to nearby receiving waters:

Transport, Storage, Use and Disposal of Petroleum Products and Toxic Substances

- Refueling and maintenance activities should be undertaken on level terrain, at least 30m from any surface water, on a prepared impermeable surface with a collection system to ensure oil, gasoline and hydraulic fluids do not enter surface waters. Waste oil should be disposed of in an approved manner
- Drums of petroleum products or chemicals should be tightly sealed against corrosion and rust and surrounded by an impermeable barrier in a dry, water-tight building or shed with an impermeable floor
- In order to ensure that a quick and effective response to a spill event is possible, spill response equipment should be readily available on-site. Response equipment, such as adsorbents and open-ended barrels for collection of cleanup debris, should be stored in an accessible location on-site. Personnel working on the project should be knowledgeable about response procedures. The proponent should consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event.
- **The proponent should report any spills of petroleum or other hazardous materials to the Environmental Emergencies 24 Hour Report Line (St. John's 709-772-2083; Other areas 1-800-563-9089).**