

Mr. Darrin Hicks  
Canada-Newfoundland & Labrador Offshore Petroleum Board  
1<sup>st</sup> Floor, TD Place  
140 Water Street  
St. John's, NL A1C 6H6

Our Date: 2016-05-11  
Our Reference: SC-CNO-0054-16  
[REDACTED]

**Reference: Statoil Canada Limited - Revised 2016 Seismic Environmental Assessment Amendment**

Dear Mr. Hicks:

Statoil Canada Ltd. hereby submits a revised environmental assessment (EA) amendment "2016 Amendment to the Environmental Assessment of Statoil's Geophysical Program for the Jeanne d'Arc and Central Ridge / Flemish Pass Basins, 2011-2019" to address the April 19, 2016 comments.

Responses to the following comments have been incorporated into the revised EA amendment, where applicable.

**General Comments**

**C-NLOPB Comment:**

There are multiple references to "amendments" in the "2016 Amendment to the Environmental Assessment of Statoil's Geophysical Program for the Jeanne d'Arc and Central Ridge / Flemish Pass Basins, 2011-2019 (Statoil Canada Ltd. March 2016)." For clarity, the C-NLOPB reviewed and assessed one (1) amendment in 2012.

**Statoil Response:**

We agree that one amendment to the environmental assessment was submitted in 2012. Any reference to 'amendments' has been replaced with 'amendment'.

**C-NLOPB Comment:**

There are multiple references to "Addenda" in the "2016 Amendment to the Environmental Assessment of Statoil's Geophysical Program for the Jeanne d'Arc and Central Ridge / Flemish Pass Basins, 2011-2019(Statoil Canada Ltd. March 2016)." For clarity, the C-NLOPB reviewed and assessed one (1) addendum in 2011.

**Statoil Response:**

The term "Addenda" was used instead of "Amendments". All references to 'addenda' have been replaced with 'amendment'.

**Department of National Defence (DND) Comment:**

- Please identify a specific individual or office to serve as a Point of Contact (POC) for MARLANT queries and concerns
- Please ensure the appropriate Notice to Mariners will be issued for all underwater activities and any significant surface ventures, such as use of flares, buoys, and unconventional lighting;

- Please ensure the appropriate Notice to Airmen will be issued for all activities that could affect air safety, such as use of balloons, Unmanned Aerial Vehicles (UAVs) or tethered airborne devices; and
- Please ensure engagement of CTF 84, through Director General Naval Strategic Readiness (DGNSR), to ensure de-confliction with possible Allied submarine activities.

Due to the inherent dangers associated with UXO and the fact that the Northwest Atlantic Ocean was exposed to many naval engagements during WWII, should any suspected UXO be encountered during the course of the operations, the Proponent should not disturb/manipulate it. The Proponent should mark the location and immediately inform the Coast Guard. Additional information is available in the 2010 Annual Edition - Notices to Mariners, Section 37. Further UXO general information is available at our website at [www.uxocanada.forces.gc.ca](http://www.uxocanada.forces.gc.ca).

**Statoil Response:**

Bullet 1: All queries can be addressed to Ms. Stephanie Curran, Regulatory Lead, Statoil Canada Ltd. 2 Steers Cove, Cormack Building, St. John's NL A1C 6H5. 709-726-9091.

Bullet 2: Statoil will issue a Notice to Shipping upon commencement of any planned activities.

Bullet 3 – Statoil does not currently have any geophysical activities planned for 2016. If activities are to be undertaken in 2017 or future years, Statoil will consult with the Director General Naval Strategic Readiness to determine if there are any planned conflicts between allied submarine activities and Statoil geophysical operations.

Comment: Statoil appreciates the advice regarding UXO. Statoil will ensure that if any UXOs are encountered, the Canadian Coast Guard will be notified and the location will be marked as recommended.

**Specific Comments:**

**C-NLOPB Comment:**

§ 1 Introduction, page 4 – please include Labrador to the Canada-Newfoundland Atlantic Accord Implementation Act.

**Statoil Response:**

The federal title of the Act has been corrected to include the word Labrador. It now reads as *Canada-Newfoundland and Labrador Atlantic Accord Implementation Act*.

**C-NLOPB Comment:**

§ 1.1 Previous Environmental Assessment Review and Approval, page 4 - In May 2012, Statoil submitted an Amendment, not an Addendum, to address a change in the spatial (geographic) scope to accommodate the extension to the survey lines outside the project area boundary during the 2012 program. This section will need to be rewritten to properly reflect the Amendment of 2012.

**Statoil Response:**

The section has been revised to replace the word Addendum with Amendment and a more detailed explanation for that amendment.



**C-NLOPB Comment:**

§ 1.3 Purpose and Structure of the EA Amendment, page 5, 1st sentence – some clarity is required with respect to the reference to amendments. The C-NLOPB reviewed and assessed one (1) amendment, in 2012.

**Statoil Response:**

References to "amendments" have been changed to "amendment" to reflect the one amendment to the original environmental assessment submitted in 2012.

**C-NLOPB Comment**

§ 4.2 Commercial Fisheries, page 13, paragraph 3 – As of February 2016, fish data for commercial fishing activity in 2014 was and still is, available.

**Statoil Response:**

Statoil's consultant, who prepared the EA Amendment, requested 2014 fisheries data from DFO Statistical Services on January 4, 2016. They made several follow-up requests to ascertain when the data would be made available. On March 21, 2016 our consultant received the geospatial mapping data and on March 22, they received the fish landings statistics. Since our EA Amendment was submitted to the C-NLOPB on March 15, 2016, this data was not available to Statoil to be incorporated into the amendment. The EA amendment was revised to include the now available 2014 fisheries data.

**C-NLOPB Comment:**

§ 5.1 Consultation, page 17 – The correct name for Once Ocean is One Ocean.

**Statoil Response:**

Noted. "Once" has been changed to "One".

**Fisheries and Oceans Canada Comment:**

§ 2.2.1, page 8 – the document provides the Exploration Licenses (EL) held totally or partially by Statoil that fall within the amended project/ study area (i.e. EL 1139, 1140, 1141, 1142, 1143 and 1138 (Statoil in partnership with Chevron) for clarity these ELs should be numbered on Figures 1, 2, and 3 which show the expanded Study/project areas relative to Statoil ELs.

**Statoil Response:**

Figures 1, 2, and 3 have been revised to include EL and SDL numbers for licences in the Flemish Pass area where Statoil is an interest holder and/or operator.

**Fisheries and Oceans Canada Comment:**

§ 5.2.5 Species at Risk, page 20, 2nd paragraph, last sentence – it is accurately noted that "No designated critical habitat for these SARA – listed species occurs in the Project and Study Areas". Given that the proposed geophysical program is planned to extend to 2019 the status of designation of critical habitat for SARA listed species may (or may not) change, as such any future EA Updates should bear this in mind and ensure that they reflect the most current and accurate information vis a vis SARA species critical habitat designations.

**Statoil Response:**

If Statoil undertakes any geophysical program in 2017 through to 2019, an Environmental Assessment update will be provided to the C-NLOPB that will provide updated information on Species at Risk and/or their critical habitat. This is in accordance with the requirements as set out in the June 30, 2011 C-NLOPB screening decision for the original environmental assessment which states:

*"At the time of application for subsequent program authorization in the Project Area, Statoil Canada Limited will be required to provide information to the C-NLOPB. This information should outline the proposed activities, confirm that the proposed program activities fall within the scope of the previously assessed program, and indicate if, with this information, the EA predictions remain valid. In addition, Statoil Canada Limited shall provide information regarding the adaptive management requirements of SARA into program activities (e.g., introduction of new species or critical habitat to Schedule 1; additional mitigations; implementation of recovery strategies and/or monitoring plans)."*

**Fisheries and Oceans Canada Comment:**

Appendices – similar to above comment since the planned geophysical program is planned to continue into 2019 any subsequent EA Updates should also present the most current information on existing commercial fishing activity within the Project and Study Areas.

**Statoil Response:**

Should program activities be undertaken in 2017 through to 2019, the Environmental Assessment Update, as referenced above will include an update of fisheries data, provided fisheries data information is available at the time of preparing the EA update report.

For enquiries related to the above responses and the enclosed revised environmental assessment amendment, please contact [REDACTED]

Yours truly,

[REDACTED]  
Operations Manager  
Statoil Canada Ltd.