

**REGISTRATION 1665**  
**ASSESSMENT COMMITTEE SCOPING DOCUMENT COMMENTS**  
*Argentia Wellhead Platform for White Rose Extension*

Date: November 29, 2012

**DEPARTMENT OF ADVANCED EDUCATION AND SKILLS**

*Skills Division*

Request the proponent provide:

1. qualifications, certifications and other requirements, including the need for, location and availability of related training opportunities (e.g., post-journey person training) associated with key positions for all phases of the project; and,
2. an estimate of the number of apprentices (by level) and journeypersons required.

*Labour Market Development Division*

Request the proponent provide:

3. National Occupation Classification (NOC) codes at the 4-digit level associated with each position for all phases of the project, including the number of positions associated with each NOC code.
4. The approximated time lines for each of the positions during the construction and operations phases of the project. This would include the number of positions for each 4-digit NOC code throughout the project at specified time intervals (monthly or at least quarterly) which would show levels of employment throughout the project timeline.
5. An indication of whether the positions are full-time equivalent or if they are the actual number of positions; if they are indeed the actual number of positions, how many are full-time vs. part-time.
6. An estimate of the number of apprentices (by level and trade) and journeypersons required.
7. The anticipated source of the workforce, including an estimate of local employment (local area, provincial) and any strategies for recruitment.
8. A commitment to provide quarterly reports during the construction phase as well as for the duration of the operations phase, including information on the number employed by 4-digit NOC, the number of full-time/part-time employees, the number of apprentices (by level) and journeypersons, gender, and source of the

workforce.

## **DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

### *Environmental Assessment Division*

#### Labour Camp

9. The registration document states “At this time, Husky does not anticipate the need for a labour camp” (registration pg. 11). Husky needs to provide further justification on their position regarding a labour camp.

#### Site Decommissioning

10. Site decommissioning or future use/planning of this purpose-built graving dock the registration document states “Husky does not plan to continue operation of the graving dock facility” (registration pg. 36). Also stated in the registration document is “During the design of the graving dock and its associated construction site, consideration will be given to designing the facility as a permanent graving dock, which could be used for the construction of future CGSs or for other industrial applications. Design of the graving dock for future use could include provision for a gated system allowing the graving dock to be flooded and drained as required” (registration pg. 12). There are no commitments in the registration to do any of the above and site rehabilitation or reuse for future is unknown. These options should be described in more detail including commitments.

### *Pollution Prevention Division*

#### Information Requirements:

11. It is stated that water removed from the graving dock will be pumped into a lined 2,700 m<sup>2</sup> settling pond, where it will be aerated and tested against applicable regulations prior to ocean disposal. Details should be provided on the location and construction of the settling pond, how the water flow into the settling pond will be managed, and how this water will then be discharged into the ocean and if the settling pond be constructed to hold a large enough volume of water to avoid overflow and potential ground contamination.
12. It is stated in section 4.2.5.4 that the expected zone of influence in groundwater is 20 hectares zone. How was this calculated? Following this statement, it states that contaminated groundwater is not expected to be drawn from adjacent land during the graving dock excavation. Has groundwater chemistry within this 20 hectares been investigated? Please provide further information.
13. It is stated in section 4.2.4 that an estimated 4-6 m of excavated material will be spread over the existing grade of the site. Details of the purpose of this should be provided as well as details of extent of the area to be graded should be provided.

14. The contaminant concentrations are used to determine if and how the excavated/dredged material can be re-used. In order to re-use excavated soil/dredged sediments around the site; it must meet commercial guidelines for all parameters with the exception of petroleum hydrocarbons. If petroleum hydrocarbon concentrations exceed 1000 mg/kg, it cannot be reused on site. This material must go to a soil treatment facility. The applicable guidelines for disposal in the pond would depend on whether or not the pond will remain a pond or if it is going to be completely filled in with excavated soil/dredged sediments. If the pond is going to remain a pond (i.e., not completely filled in), the material should meet the sediment quality guidelines to be protective of aquatic receptors. As it does not appear to be known whether the pond will be completely filled in or not, the most conservative (lowest) of the sediment quality guidelines and the commercial soil quality guidelines should be used for comparison. These guidelines should be referenced when discussing analytical results throughout the registration document.
15. Section 4.2.6 indicates that if all of the excavated soil/dredged sediments are disposed of in the pond; the material volume would exceed the water volume but would not exceed the volume of the natural topography of the pond. If this is the case, would additional soil be brought to the site to completely level the area? Please provide further information.
16. Details of how the displaced pond water is going to be managed during filling of the pond to ensure no impact to surrounding soil/groundwater/surface water and no issues with erosion, siltation, etc. A plan for the management of displaced pond water should be provided.
17. It is stated in Section 4.3.7 that “Disposal of material in the Pond can be considered disposal for beneficial use since it would essentially be capping the contaminated sediments in the Pond with cleaner sediments thereby reducing the ecological risk” The ERA completed in 1998 indicated potential for unacceptable risks from PAHs in The Pond. However, in closure documentation previously provided to the Department by PWGSC, it is stated that a further assessment was conducted by Cantox in 2005 which concluded that further remediation was not required at the Pond. This same conclusion is referenced on page 23 of the registration document. It is therefore not evident that remediation/risk management is actually required at the Pond. In addition, based on the sediment samples collected during the recent sampling programs conducted by Husky, the pond sediment chemistry does not appear to be significantly different than that of the dredged materials, with the exception of some slight PCB exceedances. The PCB results appear to be fairly consistent with those from 1997. Based on this, in order to determine if disposal in the pond is a beneficial use for excavated materials, an updated risk assessment would be required to demonstrate that risk management/capping is warranted.

### *Water Resources Management Division*

18. The registration document does not provide enough details to support a request to dispose of the materials resulting from dredging and grave site excavation into the Pond. Therefore the proponent should explore options on the beneficial use of materials resulting from grave site excavation and ocean dredging along with a cost benefit and environmental analysis. Beneficial uses may include options such as; onsite storage of the materials for use by others or to stabilize the graving site post construction; use of the materials for leveling nearby land which may be beneficial to the owner of the site; use of materials to improve the environmental condition of the Pond; and possibility of ocean disposal of dredged materials.
19. The proponent will be required to submit a groundwater-flow and groundwater-quality monitoring and treatment plan for review. The monitoring plan should be developed using a conceptual model of the area to assess the effect the excavation and dewatering will have on groundwater levels, flows and potential to increase migration of contaminants to the graving site. If this conceptual model indicates there is little or no risk of contaminated groundwater being pulled into the graving site, the monitoring program should reflect this assumption. The water treatment plan should outline how the water will be treated if required to meet the regulatory effluent standards.

### **Department of Natural Resources**

The Operator must include in the Scoping document the following commitments:

20. All benefit amendment components including local benefit capture, and Gender Equity and Diversity Plans (including Business Access Strategies) with the Province for the construction, operations and decommissioning phases of the project will be finalized and approved by the Minister of Natural Resources, and for Gender Equity and Diversity, the Minister responsible for the Status of Women prior to the start of construction.
21. The Operator agrees to address any additional benefit concerns identified by the province arising from the Wellhead project.
22. Any Benefit Amendments will be submitted to the CNLOPB as an amendment to the Benefits Plan, and will also be amended in the overall White Rose Benefit Framework if deemed necessary by the Province.

### **Executive Council, Women's Policy Office**

23. WPO requires the Operator to commit in the Scoping Document to the development of a separate and distinct Gender Equity and Diversity Plan (including Business Access Strategies) for the White Rose Extension Project (WREP) which covers all phases of the Project, including construction and

- operations. The Plan must be finalized and approved by the Minister Responsible for the Status of Women prior to the start of construction.
24. The Operator currently has a Diversity Plan in place for the White Rose Project but the plan is not sufficient to effectively capture the expansion. The WREP encompasses a new and distinct piece of work and requires a Gender Equity and Diversity Plan with goals and targets specific to the WREP. Further, the existing plan does not include provisions for business access which is now a requirement of all new Gender Equity and Diversity Plans negotiated by the Province.