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## **13.0 SENSITIVE AREAS**

Sensitive Areas have been included as a VEC due to stakeholder and regulatory concerns about the vulnerability of such areas to potential WREP-related environmental effects, including those arising from either planned activities or accidental events.

Sensitive Areas are commonly associated with one or more of the following: rare or unique marine habitat features; habitats that support sensitive life stages of valued marine resources; and/or critical habitats for species of special conservation status. For this environmental assessment, Sensitive Areas are defined based on the definition provided in the Scoping Document (C-NLOPB 2012a):

...any sensitive areas in the Study Areas, such as important or essential habitat to support any of the marine resources identified, or areas identified through the Grand Banks-Placentia Bay (PBGB) Large Ocean Management Area (LOMA) Integrated Management Plan Initiative (Ecologically and Biologically Sensitive Areas (EBSAs), Valuable Marine Ecosystems (VMEs), Marine Protected Areas (MPAs), etc.)

### **13.1 Environmental Assessment Boundaries**

The spatial and temporal boundaries of the WREP, including specifically the Nearshore and Offshore Project and Study Areas, are described in Chapter 5 (Effects Assessment Methods).

#### **13.1.1 Spatial Boundaries**

Sensitive Areas identified within or near to the Nearshore and Offshore Study Areas are shown in Figures 13-1 and 13-2, respectively, with the exception of eelgrass beds, capelin beaches and salt marshes, which are identified/described in Section 13.3.1. Oil spill trajectory modelling has been used to determine the potential maximum Affected Area.

##### **13.1.1.1 Nearshore**

The Nearshore Study Area (Figure 13-1) of most relevance for the Sensitive Areas VEC is that associated with an accidental oil spill. Cape St. Mary's Seabird Ecological Reserve will be included in the review of the Sensitive Areas VEC. Although it is outside of the Nearshore Study Area and beyond the area predicted by oil spill trajectory models, Cape St. Mary's has been included in the environmental assessment because of its exceptional ecological and cultural importance.

##### **13.1.1.2 Offshore**

The Offshore Study Area (Figure 13-2) associated with an oil spill has the potential to interact with several identified sensitive areas. Routine WREP-related activities and operations (e.g., drill cuttings deposition) are not expected to interact with offshore sensitive areas, and therefore have not been included in the scope of assessment for this VEC.

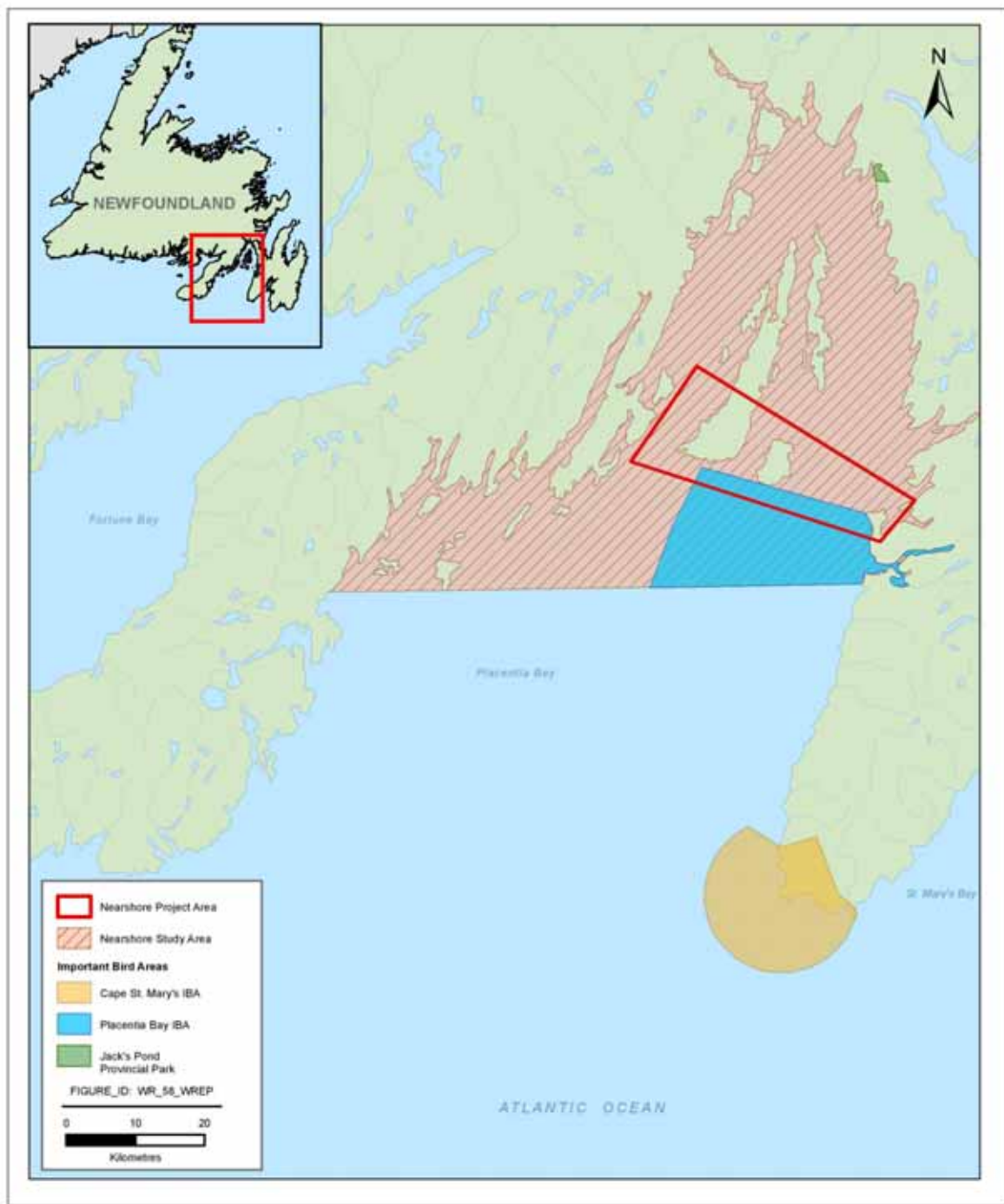


Figure 13-1 Sensitive Areas Identified Within or Near to the Nearshore Study Area

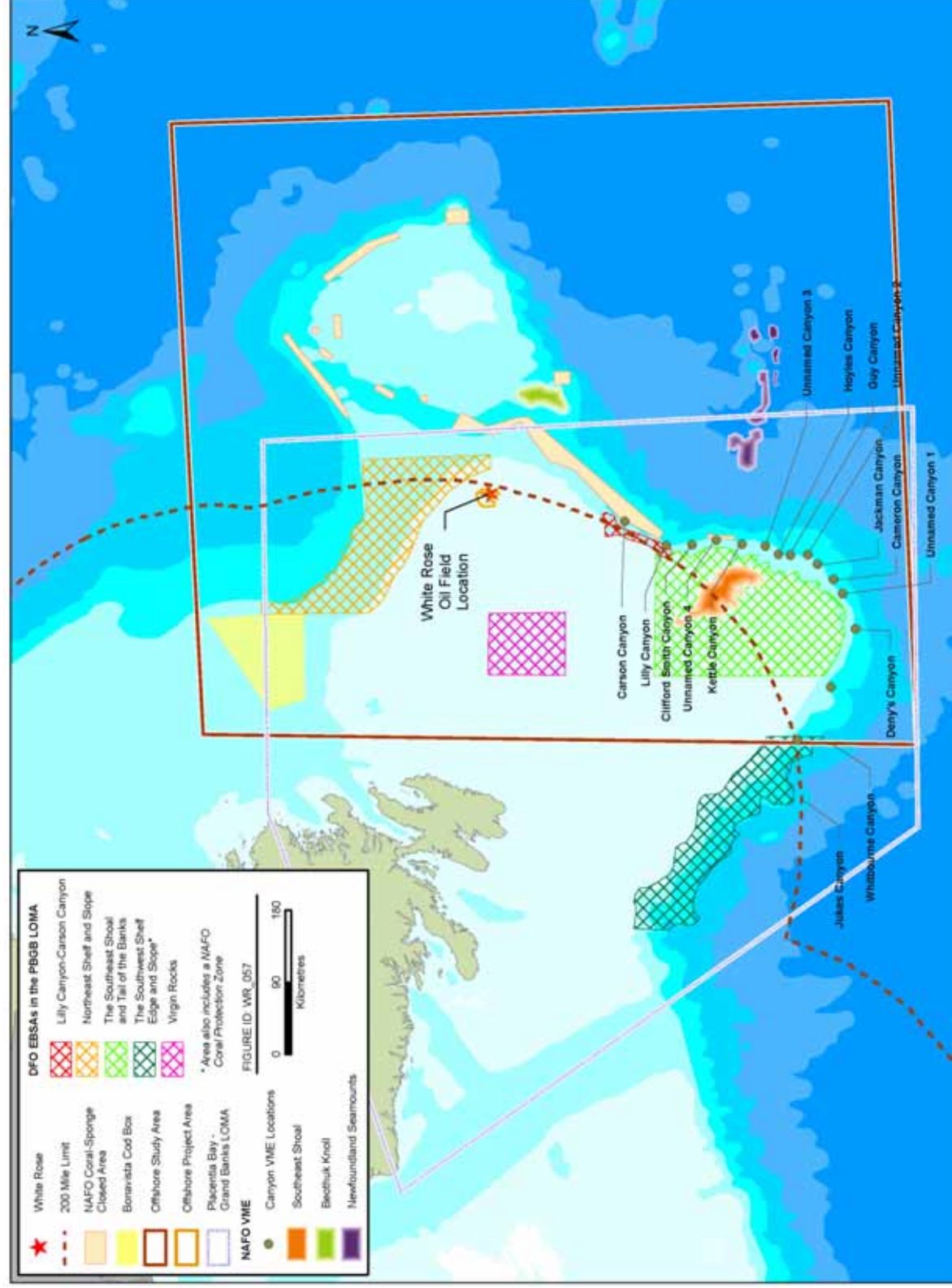


Figure 13-2 Sensitive Areas Identified Within or Near to the Offshore Study Area

### 13.1.2 Temporal Boundaries

The temporal boundaries for the assessment are defined in Chapter 5 and outlined in Table 13-1.

Table 13-1 Temporal Boundaries of Nearshore and Offshore Study Areas	
Study Area	Temporal Boundary
Nearshore	<ul style="list-style-type: none"> <li>In the case of the WHP development option, site preparation, graving dock construction, construction of CGS, dredging, topsides mating and tow-out will occur over an estimated 30 to 38 months from 2013 to 2016. Some activity will occur at all times of year until completion.</li> <li>In the case of the subsea drill centre development option, no nearshore activities will occur.</li> </ul>
Offshore	<ul style="list-style-type: none"> <li>In the case of the WHP development option, site preparation, installation of the WHP, and initial production/maintenance will occur from 2016 or 2017. The WHP will be decommissioned and abandoned in accordance with standard practices at the end of its production life, which is anticipated to be 25 years.</li> <li>The subsea drill centre option is scheduled to begin the construction phase in 2014, with first oil expected in 2015. Under this option, the wells will be plugged and abandoned at the end of its production life (anticipated to be 20 years), and the subsea infrastructure removed or abandoned in accordance with relevant regulations.</li> </ul>

### 13.1.3 Administrative Boundaries

Protection of marine sensitive areas is provided by Canada's *Oceans Act*, which authorizes DFO to provide enhanced protection to marine areas of ecological or biological significance (DFO 2004e, 2007b).

In addition to the *Oceans Act*, many sensitive and/or special areas are sites that may provide habitat for species identified as threatened or endangered. Thus Sensitive Areas may be regulated under the SARA. NAFO has committed to identifying VMEs as well as areas with high densities of intact coral and/or sponge habitat (coral-sponge closure areas) in the offshore environment within the context of deep sea fisheries management. Several Sensitive Areas identified within the offshore study area are VMEs (as identified on Figure 13-2).

## 13.2 Definition of Significance

A significant adverse residual environmental effect is one that alters (physically, chemically or biologically) the valued habitat of the identified Sensitive Area, to such an extent that there is a decline in abundance of key species or species at risk or a change in community structure, beyond which natural recruitment is unable to return the population or community to its former level (within several generations).

An adverse residual environmental effect that does not meet the above definition is considered to be not significant.

## 13.3 Existing Environment

The Sensitive Areas included in this environmental assessment include any sensitive areas in the Nearshore and Offshore Study Areas, such as important or essential habitat to support any of the marine resources identified, or areas identified through the PBGB-LOMA Integrated Management Plan Initiative (EBSAs, VMEs, MPAs). The Nearshore and Offshore Study Areas occur within Canada's Newfoundland-Labrador Shelves Marine Ecozone (DFO 2010c). This biogeographic classification system is used for: i) assessing and reporting on ecosystem status and trends; and ii) spatial planning for the conservation of ecosystem properties and management of human activities.

As part of the PBGB-LOMA plan, DFO has identified EBSAs that may contain depleted or rare species, ecologically significant species and community properties, and degraded areas which require special management measures (DFO 2007b). To achieve conservation objectives, some EBSAs may be put forward as areas of interest for MPA status; other areas or species may be considered for protection under other management schemes such as SARA.

Sensitive areas in the Nearshore Study Area include: Placentia Bay Extension EBSA; capelin spawning beaches; eelgrass beds; salt marshes; wetlands; river otter habitat; Important Bird Areas (IBAs); and scallop beds. The Canadian Parks and Wilderness Society (CPAWS) have also identified 'Special Marine Areas' in Newfoundland and Labrador (CPAWS 2009), including Placentia Bay Extension and Bar Haven. Jack's Pond Provincial Park Reserve is a terrestrial park that also occurs within the Nearshore Study Area (Figure 13-1), and was designated to preserve rare plants, as well as barren, wetland and forested stream habitat (NLDEC website, June 2012).

Sensitive areas in the Offshore Study Area and adjacent area include EBSAs designated by DFO (2007b), including: Northeast Shelf and Slope; Virgin Rocks; Lily Canyon-Carson Canyon; Southwest Shelf Edge and Slope; and Southeast Shoal and Tail of the Banks. The four areas identified as EBSAs by DFO were also recognized by CPAWS as being Special Marine Areas (CPAWS 2009). Other identified Sensitive Areas include: VMEs identified by NAFO, specifically the Southeast Shoal VME and also canyon, seamount, and knoll VMEs; NAFO coral-sponge closure areas; and the Bonavista Cod Box, an important spawning area for Atlantic cod.

### 13.3.1 Nearshore

Placentia Bay has traditionally been recognized as an ecologically rich and highly productive area. Placentia Bay supports an estimated 26 species of seabirds, 13 species of waterfowl, 10 species of shorebirds, and seven species of raptors. At least 15 bird species breed in Placentia Bay. In addition, the marine environment supports at least 14 species of groundfish (including Atlantic cod), seven species of shellfish (including snow crab, lobster and scallop), 14 marine mammal species (10 whale, three seal and one river otter species), and one marine reptile (leatherback sea turtle). Some of these species are resident in the Bay, while others are seasonal visitors, predominantly migrating to the Bay during spring, summer, or fall (DFO 2008b).

The Placentia Bay Extension EBSA (which includes all of Placentia Bay) is ranked second by DFO (2007b) in priority among the 11 identified EBSAs within the PBGB-LOMA as candidate sites for designation as an MPA. The geophysical and biological characteristics of Placentia Bay have been characterized by Catto et al. (1997, 1999), which provides a framework for describing the area. Catto et al. (1999) classified Placentia Bay based, in part, on the distribution of important indicator species and habitat features, including: eelgrass; salt marsh; barachois estuaries; capelin spawning beaches; rockweed; and seabird-dominated shores. Placentia Bay is highly industrialized, but is well flushed and levels of contamination are generally low; although moderate levels of persistent organic pollutants have been detected in marine birds, harbour seals, and fish (Sjare et al. 2005).

CPAWS (2009) have also identified 'Special Marine Areas' in Newfoundland and Labrador and three of these areas occur within the Nearshore Study Area: Placentia Bay Extension (existing EBSA); Bar Haven; and Ragged Islands. An Integrated Management Plan for Placentia Bay has been developed (DFO 2008b), and the ecological reserves and special places identified (mainly terrestrial) during this process are shown in Figure 13-3.

The identified sensitive areas within the Nearshore Study Area are discussed in further detail in the following sections.





Source: DFO 2008b

**Figure 13-3 Ecological Reserves and Special Places Identified in Placentia Bay**

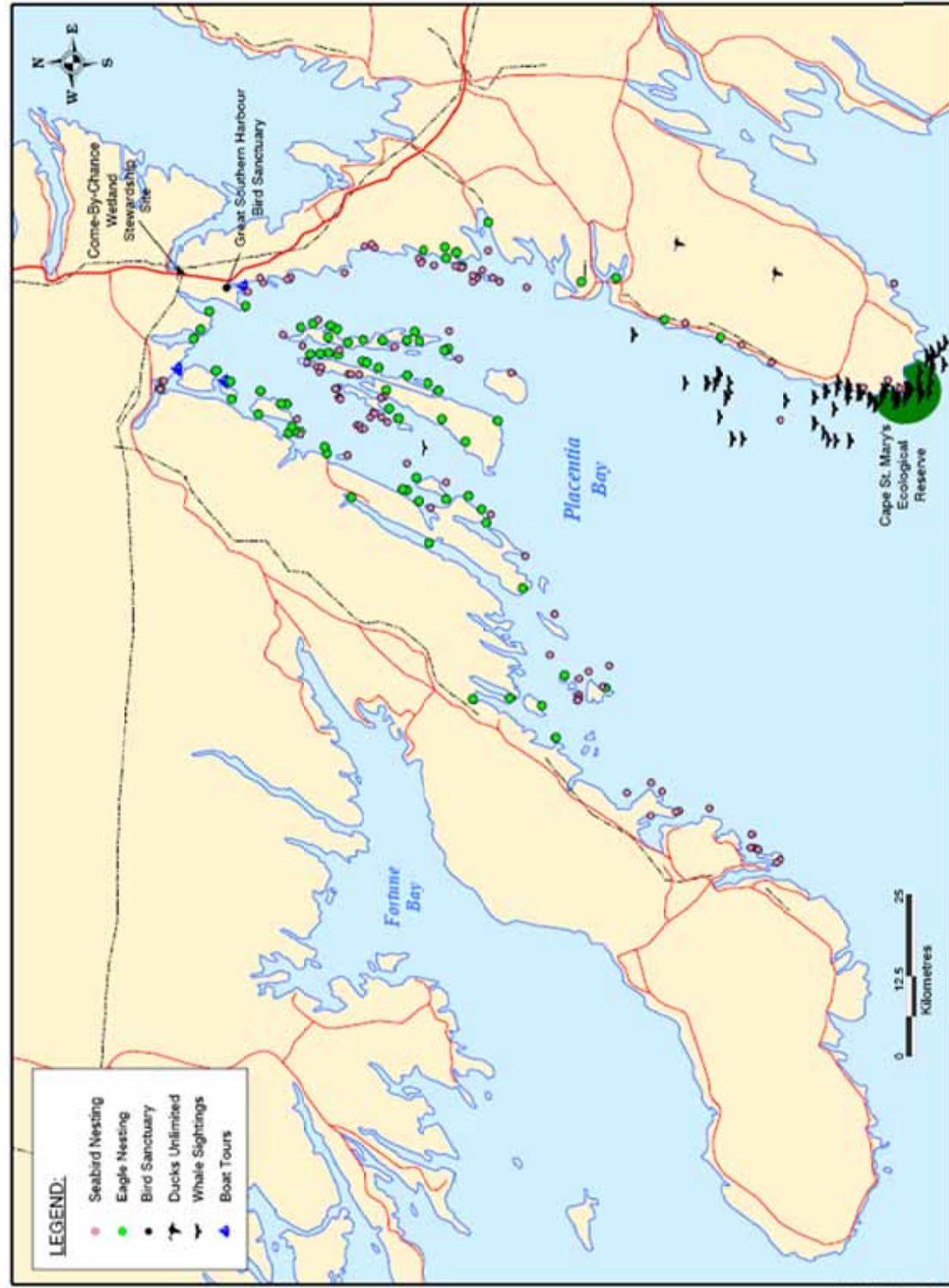
### 13.3.1.1 Placentia Bay Extension Ecologically and Biologically Significant Area

The Placentia Bay Extension EBSA is characterized by a counter-clockwise gyre and localized upwelling near headlands, driving high primary and secondary production and supporting very high biodiversity (DFO 2007). The area is known to contain high amounts of ichthyoplankton (e.g., Atlantic cod, cunner, American plaice, capelin), and to function as an important spawning and nursery ground for fish. The cod stock that occurs in southern Newfoundland is considered to be in the best condition of the Northwest Atlantic stocks and supports the largest cod fishery in the region (Bradbury et al. 2000; Lawson and Rose 2000; Robichaud and Rose 2001, 2002; Mello and Rose 2005).

Placentia Bay and the surrounding headlands are known to provide important breeding, feeding and overwintering areas for seabirds (e.g., Atlantic Puffin, Black Guillemot, Common Murre, Northern Gannet) (Table 13-2). There are also haul out and pupping areas for harbour seals and feeding areas for cetaceans (e.g., humpback whale, harbour porpoise), leatherback sea turtles, harbour seals and river otters (Figure 13-4). Placentia Bay may be part of the migratory route used by many cetaceans and leatherback turtles; it has historically been an aggregation area during summer when female-calf pairs of whales and porpoises seasonally visit the area to feed.

**Table 13-2 Number of Pairs of Marine Birds Characteristic of Placentia Bay Colonies**

Common Name	Species Name	Cape St. Mary's
Northern Fulmar	<i>Fulmarus glacialis</i>	12
Manx Shearwater	<i>Puffinus puffinus</i>	-
Leach's Storm-petrel	<i>Oceanodroma leucorhoa</i>	-
Northern Gannet	<i>Mora bassanus</i>	12,156
Herring Gull	<i>Larus argentatus</i>	Present
Great Black-backed Gull	<i>Larus marinus</i>	Present
Black-legged Kittiwake	<i>Rissa tridactyla</i>	10,000
Common Murre	<i>Uria aalge</i>	10,000
Thick-billed Murre	<i>Uria lomvia</i>	1,000
Razorbill	<i>Alca torda</i>	100
Black Guillemot	<i>Cepphus grylle</i>	Present
Sources: Stenhouse and Montevicchi (1999); Cairns et al. (1989), and Chardine (2000) [adapted from VBNC 2008]		



Source: DFO 2008

Figure 13-4 Areas Identified as Important for Birds and Whales in Placentia Bay

### 13.3.1.2 Eelgrass Beds

Eelgrass beds are highly productive habitats, as well as important sites for spawning, nursery and refugia for many species. Eelgrass is a flowering plant adapted to the marine environment and is of ecological importance (Gotceitas et al. 1997; Orth et al. 2006; DFO 2009c). Eelgrass has been found to be among the most productive ecosystems globally (Beal et al. 2004; DFO 2009c) and provides a number of important functions and services, including: supporting high diversity; providing refuge and nursery areas for invertebrates and fishes; providing food sources for migrating and overwintering waterfowl; stabilizing sediments (Catto et al. 1999); filtering the water column; shoreline protection; and recycling and storing nutrients and exchanging gases (Gotceitas et al. 1997; Catto et al. 1999; DFO 2009c; Warren et al. 2010). A variety of invertebrates feed on eelgrass directly as well as upon associated epiphytes and in turn, these invertebrates attract higher trophic levels. The softshell clam, the lugworm *Arenicola marina* and the sand shrimp *Crangon septemspinosus* are common inhabitants in the soft sediment surrounding eelgrass roots. Macroalgae use the eelgrass for support and anchorage (i.e., *Polysiphonia harveyi*, *Rhodophysetema georgii* and *Myrionema* sp.), as do hydroids, byozoans and serpulids. Fish common to eelgrass beds include cunner, lumpfish, Atlantic cod, Greenland cod, white hake, lobster and herring (Gotceitas 1997; Morris et al. 2011). Eelgrass is also important for several species of shorebirds and migratory birds including eiders. Eelgrass is considered an Ecologically Significant Species (DFO 2009c) and is protected under the *Fisheries Act* because it meets the following criteria by DFO:

- The structure of eelgrass creates habitat that is preferentially selected by other species.
- It physically supports other species and provides settlement substrate and/or protection for this associated community.
- It is widely distributed and abundant enough to influence the overall ecology of the habitat/community.

Extensive eelgrass beds have been identified in Placentia Bay (Catto et al. 1999; CPAWS 2009), particularly in shallow and sheltered coastal areas that have soft substrate and some freshwater input such as near Swift Current. Eelgrass beds characterize the Swift Current estuarine area (between North Harbour Point and Prowsetown in Placentia Bay) from just above the low tide level to approximately 3 m depth, and also the Placentia area. These eelgrass beds are known to support a diverse community including: red algae, shrimp, crabs, salmon and trout (Catto et al. 1999).

Marine habitat surveys of the benthos at the Argentia project site (e.g., adjacent to proposed graving dock site and the proposed tow-out routes) were undertaken using a ROV during winter 2012. Habitat characteristics such as substrate type, vegetation and macrofauna observed were described, including the proportion of habitat covered by eelgrass. Eelgrass habitat was observed within the proposed dredge area for the graving dock site and had an estimated cover of approximately 1 percent within the area surveyed (Stantec 2012b). Vegetation occurred in low densities in the areas surveyed, and was dominated by kelp, sea colander and sour weed. Eelgrass was not observed within either of dredge areas along the CGS tow-out corridor.

### 13.3.1.3 Salt Marshes

Salt marshes are recognized as sensitive habitats that support birds, insects and terrestrial mammals in tidal areas. Common plants that occur within these habitats include the genera *Plantago* (plantain), *Carex* (sedges), *Triglochin* (arrow grass), *Glaux* (sea milkwort), *Festuca* (fescue), *Arenaria* (sandworts) and *Potentilla* (typical cinquefoils). In Placentia Bay, salt marshes occur near Swift Current. These salt marsh plants stabilize sediments and provide coastal protection from erosion and wave action. The Swift Current estuarine area is located in northwestern Placentia Bay between North Harbour Point and Prowsetown, and includes Sound Island, Woody Island and Bar Haven Island (Catto et al. 1999). This area experiences strong freshwater influxes from Piper's Hole and other nearby rivers, although the amount and extent of freshwater discharge varies annually and seasonally (Catto et al. 1999). Waterfowl and shorebirds have not been observed to be frequent users of the salt marsh habitat, which may relate to the presence of the community of Swift Current and the Burin Peninsula Highway (Catto et al. 1999).

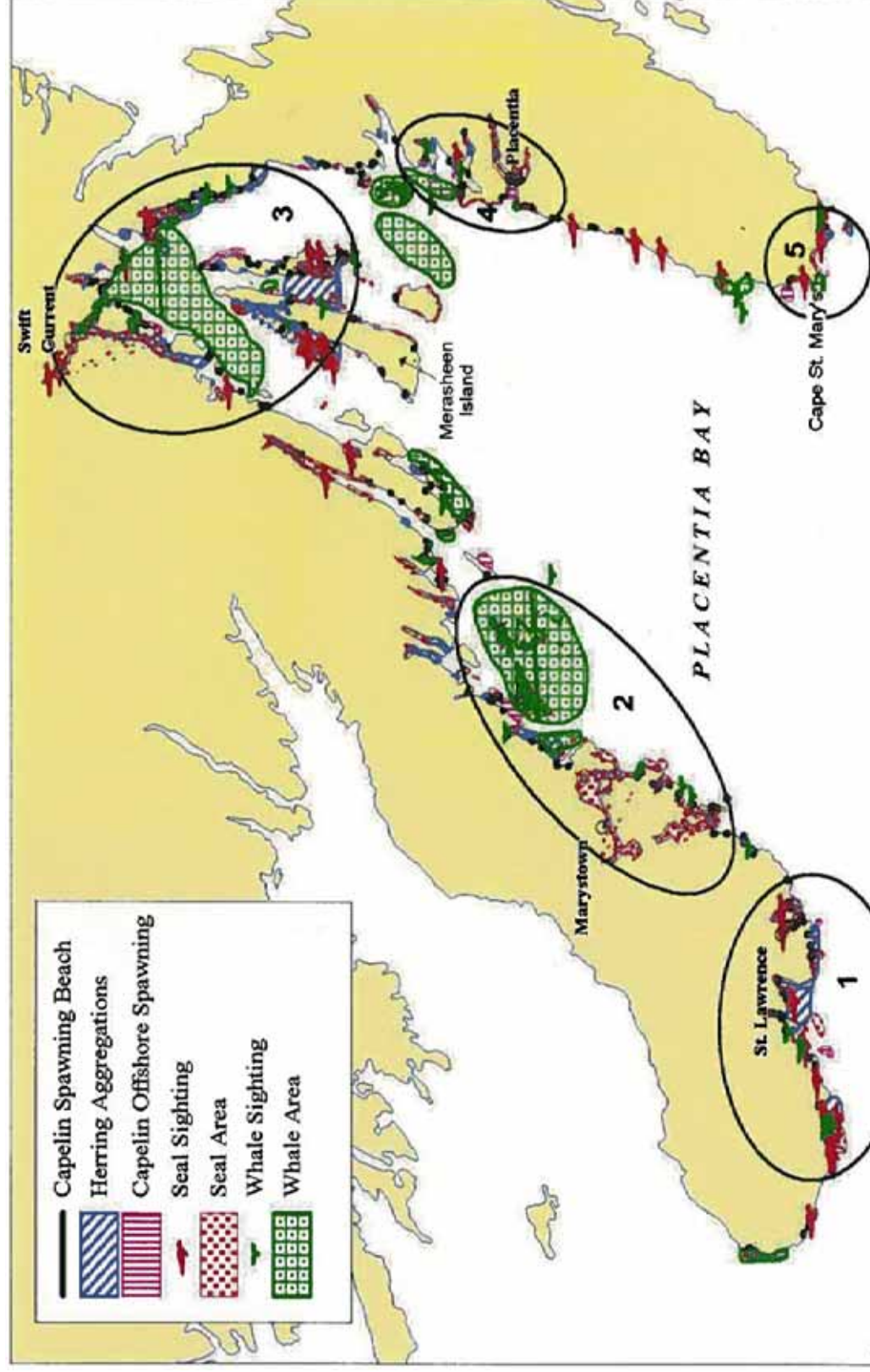
### 13.3.1.4 Capelin Beaches

Capelin occurring in southwestern Newfoundland commonly overwinter in offshore waters, migrate inshore to Placentia Bay in early spring to spawn on preferred beaches in spring and summer (Figure 13-5), and then return to the offshore once again in autumn (Nakashima and Wheeler 2002; Sjare et al. 2003).

Capelin spawning beaches and offshore spawning areas were identified by Sjare et al. (2003) based on local ecological knowledge (mainly provided by local area fishers) (Figure 13-5). The main capelin spawning beaches were near St. Lawrence, Lamaline, Cape St. Mary's and Placentia. Over 80 capelin spawning beaches were identified during the survey. In the St. Lawrence and Lamaline areas alone, 31 spawning beaches were identified, eight of which were thought to be annual spawning sites (based on local knowledge).

The St. Pierre Bank stock of capelin spawn along the southern coast of Newfoundland, typically at age three and four (Nakashima and Wheeler 2002; Gregoire 2011). Capelin typically arrive at the head of Placentia Bay in June and July, and have spawned in the past on beaches, including Fox Harbour, Point Verde, southern Ship Cove and Gooseberry Cove. Beach suitability appears to be determined by substrate type (i.e., gravel 5 to 15 mm in diameter), and capelin spawning beaches occur in sheltered, semi-exposed and exposed areas (Nakashima and Wheeler 2002; Gregoire 2011). Eggs are usually deposited in the intertidal zone, but are also known to be deposited in the subtidal zone up to 37 m. Larvae are generally carried out of the inshore region by surface currents.

For more detail on the biology of capelin in Placentia Bay, see Section 8.3.1.5.



Source: Sjare et al. 2003.

Note: Area 1 is St. Lawrence, Area 2 is Marystown, Area 3 is Swift Current/Merasheen Island, Area 4 is Placentia, and Area 5 is Cape St. Mary's. Black dots indicate known capelin spawning beaches based on local knowledge

**Figure 13-5 Areas of Importance to Pelagic Fish and Marine Mammals**



### 13.3.1.5 Bird Habitat

#### Important Bird Areas

The IBA program is an international conservation initiative coordinated by BirdLife International, designed to use scientific data to identify, conserve and monitor a network of sites that provide essential habitat for birds. In Canada, the partners for this program are Bird Studies Canada and Nature Canada. Two IBAs have been identified within or adjacent to the Nearshore Study Area: Placentia Bay; and Cape St. Mary's (see Figure 13-1).

The Placentia Bay IBA is located on the eastern shore of Placentia Bay and extends from Argentia south to Cape St. Mary's and out to 25 km from shore (total 1,398 km<sup>2</sup>). Most of this IBA occurs outside the WREP nearshore Study Area, but is included here for ecological context. This IBA is considered to be a globally important area and supports 85 known bird species, many of which congregate in the area seasonally, particularly when capelin spawn in June and July. This IBA is particularly known for the large numbers of Greater Shearwater (greater than 100,000) that gather here, as well as large numbers of Sooty Shearwater. Local breeding seabirds include Northern Gannet, Black-legged Kittiwake and Common Murre, which often prey upon capelin in Placentia Bay. Pomarine Jaegers and Parasitic Jaegers have also been observed joining the flock of feeding kittiwakes in order to steal capelin from juvenile birds. An estimated 1,000 to 2,000 Common Eiders congregate in the rocky area between Great Barasway and Gooseberry Cove to overwinter (Cairns et al. 1989; Chardine 2000; Russell and Fifield 2001; Chapdelaine et al. 2001; DFO 2007b).

Cape St. Mary's was designated a Seabird Ecological Reserve (64 km<sup>2</sup>) in 1983. It has also been selected by CPAWS (2009) as one of Newfoundland and Labrador's Special Marine Areas. Cape St. Mary's is located on the southwestern tip of the Avalon Peninsula, near the entrance to Placentia Bay. The designated IBA covers an area of 329.4 km<sup>2</sup>. Although it is located outside the Nearshore Study Area, it is included here because of its ecological importance for marine birds, as well as local tourism. The site is considered globally and nationally important due to the high numbers of seabirds and shorebirds that concentrate, as well as the occurrence of at-risk species (Russell and Fifield 2001). The site includes the cliffs of the mainland as well as islands, islets and cays offshore. The colony extends along 100 to 125 m cliffs, over a distance of approximately 5 km, and is estimated to support 30,000 breeding seabirds including Common Murres, Black-legged Kittiwakes, Thick-billed Murres, Razorbills, Black Guillemots, Herring Gulls, Great Black-backed Gulls, Great Cormorants, and Double-crested Cormorants, as well as migrant seaducks (Oldsquaw, scoters, eiders).

Many seabird and shorebird species use Cape St. Mary's as a staging site during migration, and the area seasonally to feed, including Atlantic Puffin, Manx, Sooty Shearwater, Leach's Storm-petrel, Northern Fulmar, Lesser Golden Plover, Black-bellied Plover, Canada Goose, jaegers, skuas, phalaropes, terns, loons, gulls, ducks and sandpipers (Russell and Fifield 2001; Gaston et al. 2009; Montevecchi et al. 2012). Birds using Cape St. Mary's are described in Sections 10.3.1 and 10.3.5.

Cape St. Mary's is adjacent to a rich marine area where there is strong mixing and upwelling and high concentrations of plankton. This area has traditionally been known as among one of the best fishing grounds in Newfoundland, and is an important Atlantic cod spawning area (along with Oderin Bank and Bar Haven, Placentia Bay) (Lawson and Rose 2000). Capelin, herring, blue mussel, sea urchins and marine mammals are also abundant (DFO 2007b).

Bycatch of birds in gill nets has become the primary anthropogenic cause of bird mortality at the Cape St. Mary's IBA (Piatt and Nettleship 1987; Benjamins et al. 2008; Regular et al. 2009; Montevicchi et al. 2012). Common Murres appear to experience the highest mortality as result of bycatch in Newfoundland and Labrador (Benjamins et al. 2008). Between 1980 and 1994, the breeding population of Common Murres declined by 31 percent in the Cape St. Mary's area. Annual mortality due to fishery bycatch was estimated to be 16.3 percent for Common Murres at Cape St. Mary's in 1982 (Piatt and Nettleship 1987). The highest rates of bycatch occur during the four to six week period when the capelin move inshore to spawn, as well as during the peak breeding season. Such high mortality is difficult to sustain for long-lived seabird species with few offspring and high parental investment (Russell and Fifield 2001). Although fishing is permitted within the ecological reserve, hunting is prohibited.

The second main threat to marine life at Cape St. Mary's is the potential oiling of birds or accumulation of toxins due to chronic pollution and potential oil spills. The colony at Cape St. Mary's is located near a main shipping route. In 2004, total annual vessel movement in Placentia Bay was 8,286, including 1,276 oil tankers, 62 chemical tankers, 522 cargo ships, 2,046 tug boats, 1,501 ferry movements and 1,589 fishing boats and other small vessels (under 20 m) (Transport Canada 2007). Marine traffic data collected by Transport Canada for the ports of Come by Chance, Whiffen Head, Marystown and Long Harbour from May 2011 to April 2012 (with November 2011 and March 2012 data missing) reported 1,756 commercial vessels entering ports in Placentia Bay (C. McDonald, Transport Canada, pers. comm.). However, Transport Canada does not track commercial shipping traffic into ports of Argentia, Arnold's Cove, Burin, Southern Harbour or North Harbour, and that value does not include ferry or fishing vessels.

### **Arnold's Cove Bird Sanctuary**

A bird sanctuary has been established in the town of Arnold's Cove and is an important migratory stopping site for many bird species and used year-round. Species that use the sanctuary include Black Duck, Canada Goose, Pie Ducks, Mallard Duck, Ruddy Turnstone, Plomer, Spoked Sandpiper, Twillick (Greater Yellow Legs), Merganser and variety of gulls. The largest concentration of Black Ducks in eastern Canada occurs at this site, and Ptarmigan, Bald Eagles, Osprey and Cormorants also occur occasionally. The site is protected by provincial hunting regulations ([www.townofarnoldscove.com](http://www.townofarnoldscove.com)).

### **Wetlands**

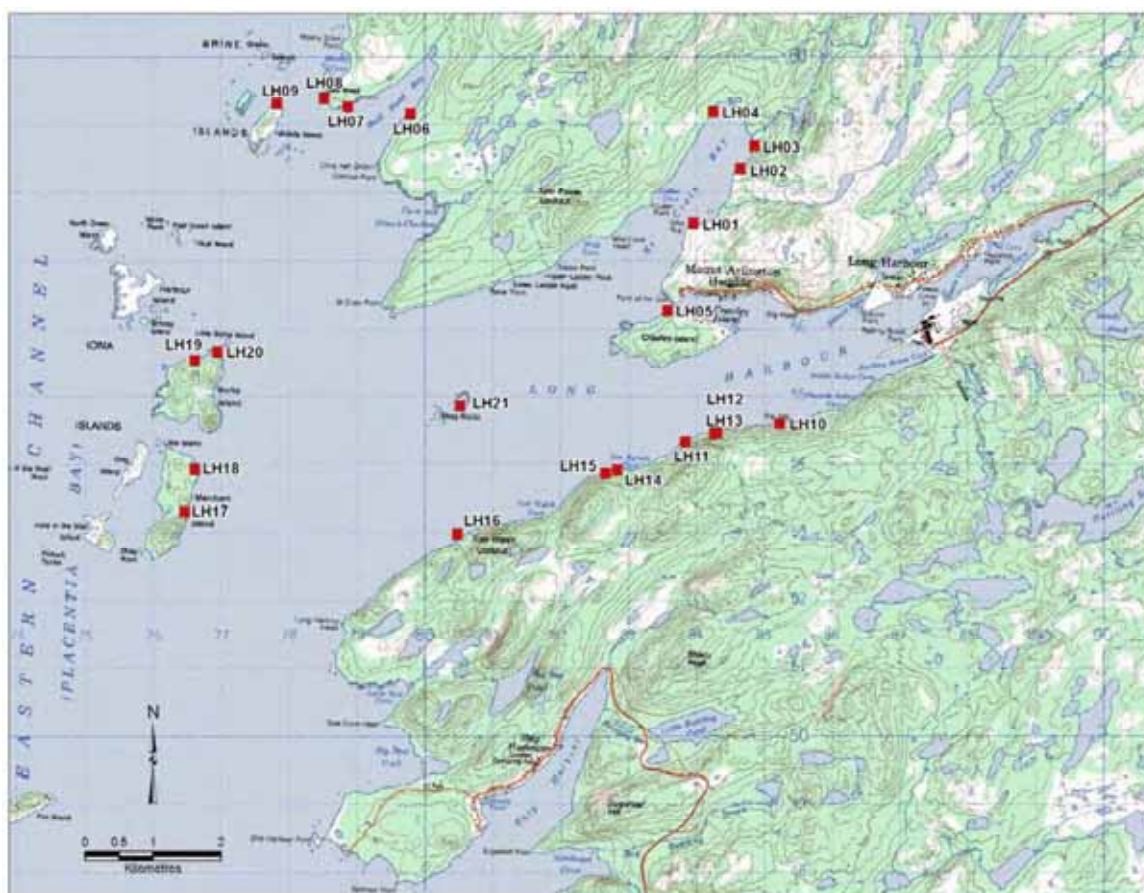
There is a Wetland Stewardship Area in the Come By Chance estuary. It was designated in 1995 to protect waterfowl staging habitat (CPAWS 2009) under a Municipal Stewardship Agreement (LGL 2007c). There are 4,046 ha protected, with a management unit area covering 289 ha. The wetlands provide important staging habitat for Black Duck, Canada Goose and Green-winged Teal.



### 13.3.1.6 River Otter Haul Outs

The river otter has adopted a marine lifestyle in Placentia Bay and is resident year-round in relatively large numbers. This species is a top predator in the ecosystem, commonly consuming invertebrates and fishes, and occasionally eating insects, waterfowl and small mammals (LGL 2007d; Cote et al. 2008). Diet studies of scat suggest river otters in Placentia Bay mainly feed on inshore fishes including cunner, gunnel, sculpin, flounder and stickleback (Cote et al. 2008).

River otter have relatively large range requirements, making the species sensitive to changes in habitat (Bowyer et al. 1995). The inner reaches of the Bay around Merasheen Island and Long Island are recognized to support one of the highest densities of river otter in Newfoundland and Labrador (Goudie 2007; Jones and Goudie 2007; Park et al. 2010). Typically, concentrations of otter are highest near the head of the Bay, and decline toward the mouth of the Bay (Mercer and Willcott 2005). Twenty-one sites have been identified as otter haul outs or 'rubs' in Long Harbour area alone (Figure 13-6). Many of the sites are located on promontories, although straight coastlines with bedrock and boulder were also frequently used (LGL 2007d).



Source: LGL 2007d

Note: Data obtained during boat surveys 2006 surveys of Long Harbour during summer and winter.

**Figure 13-6 Locations of River Otter Haul Out Sites Identified in Long Harbour**

Otters are trapped for their fur by licensed hunters from October 20 to March 15 annually in Newfoundland. An average of 93 otters is reported trapped annually in the Placentia Bay area (trapping zone 2 and 3) (NLDEC 2004; LGL 2007d). There are no data collected on bycatch of river otters in gillnets in Placentia Bay.

### **13.3.2 Offshore**

Sensitive Areas identified within in the Offshore Study Area are illustrated in Figure 13-2 and are discussed in detail in the following sections.

#### **13.3.2.1 Ecologically and Biologically Significant Areas**

As part of the Integrated Management Plan for PBGB-LOMA, DFO has identified EBSAs in the area that may require specific management measures. EBSAs are identified according to pre-established criteria, including uniqueness, aggregation, fitness consequences, resilience and naturalness (DFO 2004e). In total, 11 EBSAs have been identified within the PBGB-LOMA and ranked in terms of significance in order to determine the best candidate(s) for a MPA (DFO 2007b). Five of these 11 EBSAs are located within the Offshore Study Area (Figure 13-2): Lily Canyon-Carson Canyon; Northeast Shelf and Slope; Southeast Shoal and Tail of the Banks; Virgin Rocks; and Southwest Shelf Edge and Slope. In the ranking scheme for DFO priorities, the Southeast Shoal and Tail of the Banks EBSA was given the highest ranking, and the Southwest Shelf Edge and Slope EBSA ranked third. The other three EBSAs being considered within this section were ranked in the bottom 4 of the 11. The five EBSAs being considered are described in greater detail in the follow sections.

##### **Southeast Shoal and Tail of the Banks Ecologically and Biologically Significant Area**

The Southeast Shoal and Tail of the Banks EBSA is an area east of 51°W and south of 45°N (Figure 13-2), extending to the edge of the Grand Banks (DFO 2007b). The Southeast Shoal is notable for having the warmest bottom water temperatures on the Grand Banks and a well-defined gyre that drives high rates of primary production (CPAWS 2009) and supports reproducing populations of groundfish and capelin (Walsh et al. 2001; Fuller and Myers 2004). This area was the most recently exposed area on the Grand Banks, as it was formerly beach habitat, and the last part of the area to remain above sea level during the last glacial period. It is unique in that it contains the only shallow, sandy offshore shoal in the LOMA, as well as relict populations of blue mussel, wedge clam (*Mesoderma deauratum*) and capelin associated with beach habitats, and also has the highest benthic biomass on the Grand Banks. In their characterization, DFO (2007b) also note the Southeast Shoal has:

- The only known offshore spawning site for capelin (NAFO Division 3NO)
- The single nursery area of the entire stock of yellowtail flounder
- A spawning area for several groundfish species (American plaice, yellowtail flounder and Atlantic cod)
- An important nursery area for NAFO Division 3NO cod and American plaice

- An area that attracts large aggregations of marine mammals (especially humpback and northern bottlenose whales) and marine birds due to presence of forage species
- An area with the dense concentrations of Atlantic wolffish
- An area that has supported the highest density of American plaice on the Grand Banks since the mid-1990s.

Because of these features, it has been ranked first in priority among the 11 EBSAs. This EBSA has a dynamic sandy bottom habitat that is subject to regular disturbance by wave action and is thus less sensitive to disturbance. Fishing has greatly altered the ecosystem and DFO (2007b) concluded that ecosystem and community resilience in the Southeast Shoal area has been diminished and is likely sensitive to further disturbance.

The Southeast Shoal VME proposed by NAFO is within the boundaries of DFO's existing Southeast Shoal and Tail of the Banks EBSA (Figure 13-2).

### **Southwest Shelf Edge and Slope Ecologically and Biologically Significant Area**

The Southwest Shelf Edge and Slope is an EBSA that is located from 55°W to 52°W along the southwestern shelf edge of the Grand Bank to the 2,000 m isobaths (DFO 2007b). This area is highly productive due to upwelling processes, and is an important marine area on the Grand Banks because of the high coral species richness, groundfish biomass and seabird diversity (Kulka et al. 2003; Ollerhead et al. 2004; Edinger et al. 2007). Cetaceans and leatherback sea turtles are known to congregate in the area to feed (CPAWS 2009). NAFO closed a 14,040 km<sup>2</sup> area (NAFO Division 3O) to fishing from 2007 to 2012 to allow for research on the ecology and protection of deep water corals from the effects of fishing. In their EBSA characterization, DFO (2007b) noted this EBSA:

- Supports northernmost population of haddock in Northwest Atlantic, and this population spawns along edge of Southwest slope during spring
- Has high diversity of cold-water coral species and increased habitat structure and complexity due to the presence of these corals
- Greatest diversity of groundfish on the Grand Bank occurs on the Southwest Slope
- High biomass of groundfish
- Monkfish, pollock and white hake only occur along the Southwest Slope and within the Laurentian Channel within the PBGB-LOMA
- Supports Atlantic cod population and migratory route, and historically was area of high density
- Important spawning area for redfish species
- Has highest density of pelagic seabirds feeding within the PBGB-LOMA

- Cetaceans and leatherback sea turtles aggregate in this area to feed, particularly during summer.

DFO (2007b) also noted in their ranking of this EBSA that high fishing effort in this area as well as high rates of coral bycatch indicate this system has been heavily impacted by human activities. The Southwest Shelf Edge and Slope EBSA borders the Offshore Study Area and only a small proportion occurs within the Offshore Study Area (Figure 13-2).

#### **Lily Canyon-Carson Canyon Ecologically and Biologically Significant Area**

Lily Canyon-Carson Canyon is an EBSA that extends from 44.8°N to 45.6°N along the 200 m depth contour of the southeast slope of the Grand Banks (Figure 13-2). It contains Lilly Canyon and Carson Canyon, two areas where upwelling occurs due to wind (storms) as well as mixing of cold and warmer waters (CPAWS 2009). This area is variably productive, but at times can be highly productive and is strongly influenced by the Labrador Current. The area is biologically important due to the abundance of Iceland scallops, as well as feeding and overwintering of marine mammals (Ollerhead et al. 2004; CPAWS 2009). In their ranking of this EBSA, DFO (2007b) noted the area has:

- High concentrations of Iceland scallop
- Aggregations of marine mammals year-round for feeding and overwintering
- Deeper parts of canyons are relatively undisturbed by human activities.

It is ranked eighth of the 11 identified EBSAs in terms of DFO's priorities within the PBGB-LOMA. The area is assigned an overall low ranking in terms of uniqueness since other canyons occur throughout the Grand Banks, and because Iceland scallop are known to occur elsewhere.

#### **The Northeast Shelf and Slope Ecologically and Biologically Significant Area**

The Northeast Shelf and Slope EBSA is located on the northeastern Grand Banks, starting at the Nose of the Bank, from 48°W to 50°W, and from the edge of the shelf (e.g., 200 m depth contour) to the 1,000 m depth contour (Figure 13-2). The area is not considered unique but supports spotted wolffish and Greenland halibut populations, contains two important coral areas at Robin's Point and Funk Island Spur, and is a known feeding area for marine mammals, particularly harp seals, hooded seals, and pilot whales (CPAWS 2009). In their EBSA ranking assessment, DFO (2007b) noted that the Northeast Shelf and Slope EBSA has:

- Aggregations of spotted wolffish in spring (listed as threatened under SARA)
- High concentrations of Greenland halibut in spring
- Aggregations of marine mammals.

This EBSA is ranked ninth of the 11 identified EBSAs as a priority by DFO.

### **Virgin Rocks Ecologically and Biologically Significant Area**

The Virgin Rocks EBSA is located in the northern central area of the Grand Banks, and comprises the area from 46°N to 46.8°N and from 50°W to 51°W (Figure 13-2). The area is known to have exposed rocks (as shallow as 3.6 m) near the middle of the bank, a habitat that does not occur elsewhere on the Grand Bank and supports several fish species (Ollerhead et al. 2004) as well as marine birds. An estimated 1,000 to 2,000 Common Eiders commonly overwinter near the Virgin Rocks (CPAWS 2009). The site has high plankton productivity as well as dense kelp beds in the rocky shallow subtidal (CPAWS 2009). In their assessment, DFO (2007b) noted that the Virgin Rocks EBSA:

- Is considered geologically unique in the LOMA, because large, nearly exposed rocks occur offshore
- Supports aggregations of capelin and marine birds
- Provides spawning and breeding habitat for Atlantic cod, American plaice and yellowtail flounder, although these species are known to spawn elsewhere (CPAWS 2009).

The Virgin Rocks EBSA is ranked lowest in priority of the 11 identified EBSAs, largely because historical intensive fishing has resulted in the decline of several of the traditionally abundant species in the area, thereby reducing the resiliency of the area.

#### **13.3.2.2 Northwest Atlantic Fisheries Organization Vulnerable Marine Ecosystems**

NAFO has identified candidate VMEs with the goal of managing deep sea fisheries and the potential environmental effects that such fishing could have. NAFO uses criteria that have received general consensus internationally (i.e., the Food and Agriculture Organization (FAO) of the United Nations International Guidelines for the Management of Deep Sea Fisheries in the High Seas) (NAFO 2008). Several VMEs have been proposed in the LOMA, including many of the canyons along the shelf edge, seamounts and knolls, the Southeast Shoal, cold seeps, carbonate mounds and hydrothermal vents. However to date, the focus for identifying candidate VMEs have been areas that are currently fished (i.e., benthic data available), or that are currently technically feasible for fishing (refer to Figure 13-2) (NAFO 2008). The defined VMEs will likely be subject to additional management measures aimed to protect the high biodiversity of these areas (NAFO 2008).

The five criteria for VME identification are: uniqueness or rarity; functional significance of the habitat; fragility; life history traits of component species; and structural complexity of the habitat. Specifically, sessile or slow-moving benthic organisms such as corals, sponges and bivalves were identified by NAFO (2008) as important habitat-forming organisms. These species increase habitat structure and complexity as well as the number of microhabitats and niches, thereby attracting greater concentrations of fish and other species. Many of these cold-water coral species and large sponges are slow-growing organisms that are fragile and vulnerable to fishing disturbance, and this was also considered in selecting VMEs.

The following VMEs that have been identified by NAFO occur within the Offshore Study Area.

## **Canyons**

Canyons are distinctive features of the seafloor that are known to be important habitats for many species and communities, as they typically extend from 200 to 2,000 m depth and occur over the continental shelf. Canyon habitat can support diverse communities, including cold-water corals and deep sea fishes (Gordon and Fenton 2002). NAFO has identified 13 canyons that occur within the Offshore Study Area: Denys Canyon; Cameron Canyon; Jackman Canyon; Guy Canyon; Hoyles Canyon; Kettle Canyon; Clifford Smith Canyon; Lilly Canyon; Carson Canyon; and Unnamed Canyons 1, 2, 3 and 4 (refer to Figure 13-2). The ecological functions and services provided by canyons are not well understood, but research from well-studied canyons in the region (i.e., The Gully on the Scotian Shelf) suggest that deep-water areas support a rich, diverse community (Gordon and Fenton 2002), ranging from corals and sponges to deep-water fishes and marine mammals such as the northern bottlenose whale (Whitehead et al. 1997; Strain and Yeats 2005; Edinger et al. 2011).

## **Seamounts and Knolls**

Seamounts are defined as an elevation in the seafloor of 1,000 m or more, and can be peaked or flat at the top, and can occur as one alone, or as a chain of seamounts. Seamounts have been recognized as ecologically important features that support habitat-structuring communities such as coral and sponges, and attract aggregations of deep-sea fishes, as well as their predators. Seamounts may also be important for the mating and spawning of some species. The Newfoundland Seamounts, a chain of seamounts, occurs within the Offshore Study Area (refer to Figure 13-2). Beothuk Knoll, located southwest of Flemish Cap, also occurs within the Offshore Study Area (refer to Figure 13-2). Although there has been very little study of Beothuk Knoll to date, there is evidence of cold-water corals and aggregations of deep-sea fishes such as redfish at this site (Power 1997; NAFO 2008).

## **NAFO Coral-Sponge Closed Areas**

The NAFO scientific council identified areas of substantial coral and sponge communities within the NAFO Regulatory Area in 2008 and 2009 (Statoil 2011). As of January 1, 2010, NAFO implemented 11 coral-sponge area closures in NAFO Division 3LMN that total an area of 4,630 km<sup>2</sup>. Within NAFO Division 3O, 14,000 km<sup>2</sup> is closed to all bottom fishing and is also considered a coral-sponge area closure (refer to Figure 13-2).

### **13.3.2.3 Bonavista Cod Box**

The Bonavista Cod Box is an experimental protected area in the Bonavista Corridor and located in the northwest corner of the Offshore Study Area (refer to Figure 13-2). It was identified as being critical to the life cycle of Atlantic cod, and was designated as an experimental protected area in 2003 after consultation between DFO and the C-NLOPB and following recommendations by the Fisheries Resource Conservation Council. The Fisheries Resource Conservation Council recommended that commercial fishing (excluding snow crab trapping) and other potentially harmful activities such as seismic activities be prohibited.

### **13.4 White Rose Extension Project-Valued Environmental Component Interactions**

This section reviews potential environmental interaction between WREP activities and Sensitive Areas, as well as existing knowledge related to the potential environmental effects.

#### **13.4.1 Nearshore**

In the Nearshore Study Area, eelgrass beds, capelin beaches, wetlands, salt marshes, IBAs, scallop beds and river otter haul outs have been identified as Sensitive Areas. Some of these areas are potentially at risk of disturbance from nearshore WREP activities associated with the construction and tow-out of the CGS. For example, there is potential for dredging activities in the nearshore to adversely affect habitat through sedimentation and disturbance. The potential environmental effects on fish, seabirds and mammals are assessed separately in the Fish and Fish Habitat (Chapter 8), Marine Birds (Chapter 10) and Marine Mammal (Chapter 11) sections. The only additional routine activities that could interact with Sensitive Areas are the graving dock excavation and dredging. The environmental effects of these two routine activities are described and assessed below, in addition to the potential environmental effects from an accidental event (e.g., diesel spill).

Eelgrass may be particularly sensitive to the accidental release of hydrocarbons (Dean et al. 1998). The effects of toxins on seagrasses are not well studied, and the effects on seagrass from oil spills have varied considerably (Short and Wyllie-Echeverria 1996). The accidental release of hydrocarbons also has the potential to affect capelin spawning beaches. In addition to affecting the physical habitat of the beach itself, accumulation of hydrocarbons has the potential to affect capelin that spawn on the beach (including egg and larval stages), as well as invertebrates and shorebirds that use intertidal and beach habitat for feeding, refuge and reproduction. This potential environmental effect is discussed further in the Fish and Fish Habitat VEC (Chapter 8).

The release of diesel into the Nearshore Study Area also has the potential to affect other identified Sensitive Areas in the marine environment including salt marsh habitat, wetlands, bird habitat (i.e., IBAs), and river otter habitat; the presence of diesel could cause lethal or sublethal effects on vegetation or animals using the habitat.

#### **13.4.2 Offshore**

The Offshore Study Area contains several identified Sensitive Areas including five EBSAs, but the Offshore Project Area is nearest to the Northeast Shelf and Slope EBSA. The Offshore Study Areas also includes NAFO identified vulnerable marine ecosystems including canyons, seamounts and knolls, as well as NAFO coral-sponge closed areas and the Bonavista cod box (Figure 13-2).

Routine construction and operation activities associated with the WREP are not expected to interact with offshore Sensitive Areas.

Accidental events that may occur in the Offshore Study Area are assessed including: a synthetic-based mud (SBM) whole mud spill; a subsea hydrocarbon blowout; a crude oil surface spill; other spills (i.e., fuel, waste materials); and marine vessel incident, or a

collision (involving the WHP, vessel and/or ice). An accidental event in the Offshore Study Area would likely result in loss of habitat quality and potential mortality and therefore, overlaps with the environmental effects assessment undertaken for other VECs including Fish and Fish Habitat (Chapter 8), Commercial Fisheries (Chapter 9), Marine Birds (Chapter 10), Marine Mammals and Sea Turtles (Chapter 11) and Species at Risk (Chapter 12). The potential for interactions between the identified offshore Sensitive Areas and an accidental event is assessed in Sections 13.4.2 and 13.5.2.2.

### 13.4.3 Summary

Both the Nearshore and Offshore Study Areas have limited interactions between planned routine WREP activities and Sensitive Areas. If the WHP option is selected, then dredging activities in the nearshore may result in the removal of eelgrass in the Nearshore Project Area. The potential for interactions primarily stems from potential accidental events. An accidental event may affect Sensitive Areas, potentially resulting in changes in habitat quality or mortality of vegetation or other habitat-forming biota such as coral or sponge. The environmental effects on species using the Sensitive Areas (e.g., change in habitat use and potential mortality) are addressed in their respective VEC sections, and are not further assessed in this Sensitive Areas VEC with the exception of routine Project effects on eelgrass which is assessed further in this VEC.

A summary of the potential environmental effects from WREP-VEC interactions arising from dredging activities associated with construction of the CGS and accidental events are described in Table 13-3. Accidental events include nearshore diesel spill, offshore equipment failure, offshore subsea blowout, offshore crude oil surface spill, other offshore spills (fuel, chemicals, drilling muds, waste material) and marine vessel incident (including collisions (nearshore and offshore)).

**Table 13-3 Potential White Rose Extension Project-Related Interactions: Sensitive Areas**

WREP Activities	Potential Environmental Effects		
	Change in Habitat Quality	Change in Habitat Quantity	Mortality
<b>Construction</b>			
Dredging	x	x	x
<b>Accidental Events</b>			
Nearshore marine diesel fuel spill from support vessel	x		x <sup>(A)</sup>
Nearshore graving dock breach	x		x
Offshore SBM whole mud spill	x		
Offshore subsea hydrocarbon blowout	x		
Offshore hydrocarbon surface spill	x		
Other offshore spills (fuel, waste material)	x		
Marine vessel incident (including collision) resulting in marine diesel spill	x		
(A) A spill of diesel in the Nearshore Study Area could result in mortality of eelgrass plants. The potential for other species using Sensitive Areas are assessed in the appropriate VEC chapter			



## **13.5 Environmental Effects Analysis and Mitigation**

### **13.5.1 Nearshore Pre-construction and Construction**

During construction activities in the Nearshore Project Area, there will be excavation and dredging activities near the graving dock construction site, and dredging activities at Corridor 1 and Corridor 2, to deepen the tow-out route for the CGS. Habitat characterization studies carried out in November 2011 and between February and April 2012 indicated that eelgrass was absent from Corridor 1 and Corridor 2, but occurred near the graving dock construction site (Stantec 2012b). Eelgrass averaged approximately 8 percent of the macroflora species present in the vicinity of the graving dock and covered approximately 1 percent of the total surveyed seafloor area. Two eelgrass beds were delineated as approximately 100 m<sup>2</sup> and 1,000 m<sup>2</sup>, respectively. The predominant substrate within these two eelgrass beds was fine material and eelgrass covered a combined total of 45 percent of the seafloor of these two delineated areas. The remaining observations of eelgrass in the vicinity of the graving dock were sporadic and interspersed with more dominant brown algae (Stantec 2012b). Outside the area to be dredged, a change in habitat quality due to sedimentation is not expected to have adverse environmental effects since eelgrass are resilient to sedimentation in the water column and are able to improve water quality.

As there are multiple eelgrass beds in the Nearshore Study Area, the removal of an eelgrass bed of 1,100 m<sup>2</sup> is considered to be minor. An assessment of the potential environmental effects on Sensitive Areas as a result of dredging in the Nearshore Study Area is presented in Table 13-4.

Table 13-4 Environmental Effects Assessment: Construction

WREP Activity	Potential Positive (P) or Negative (N) Environmental Effect	Mitigation Measure	Evaluation Criteria for Assessing Environmental Effects <sup>(A)</sup>						Significance Rating	Level of Confidence	
			Geographic Extent		Frequency	Duration	Reversibility	Ecological/Socio-cultural/Economic Significance			
			Magnitude								
Nearshore											
Dredging	Change in habitat quantity (N)	<ul style="list-style-type: none"><li>Habitat compensation, if required (dredging)</li></ul>	L	1	1	3	R <sup>(B)</sup>	3	NS	H	
Key:											
<b>Magnitude:</b> N = Negligible (essentially no effect) L = Low: <10 percent of the population or habitat in the Study Area will be affected M = Medium: 11 to 25 percent of the population or habitat in the Study Area will be affected H = High: >25 percent of the population or habitat in the Study Area will be affected			<b>Frequency:</b> 1 = <11 events/year 2 = 11 to 50 events/year 3 = 51 to 100 events/year 4 = 101 to 200 events/year 5 = >200 events/year 6 = continuous			<b>Reversibility</b> (population level): R = Reversible I = Irreversible  <b>Ecological/Socio-cultural/Economic Significance:</b> 1 = Relatively pristine area not affected by human activity 2 = Evidence of existing adverse activity 3 = High level of existing adverse activity			<b>Significance Rating:</b> S = Significant NS = Not Significant P = Positive  <b>Level of Confidence:</b> L = Low level of confidence M = Medium level of confidence H = High level of confidence		
<b>Geographic Extent:</b> 1 = <1 km radius 2 = 1 to 10 km radius 3 = 11 to 100 km radius 4 = 101 to 1,000 km radius 5 = 1,001 to 10,000 km radius 6 = >10,000 km radius			(A) Where there is more than one potential environmental effect, the evaluation criteria rating is assigned to the environmental effect with the greatest potential for harm								
(B) Dependent on whether the graving dock is single-use or multi-use											

### 13.5.2 Accidental Events

Although serious accidental events are considered unlikely, such an event could occur at any time of year, throughout the life of the proposed WHP or subsea drill centre. Therefore, a conservative approach has been taken and the assessment will consider the potential environmental effects of a credible worst case accidental event (i.e., large hydrocarbon spill) occurring at the most sensitive time of year, within any of the identified Sensitive Areas.

#### 13.5.2.1 Nearshore

The assessment of the environmental effects of an accidental event on the Nearshore Study Area includes the potential effects on Sensitive Areas that could result from the accidental release of diesel fuel (as a result of a collision) in the Nearshore Study Area.

In the nearshore, the potential source of hydrocarbons entering the marine environment from the WREP activities occurs from a batch spill of fuel oil as a result of a vessel accident or grounding. In the unlikely worst-case scenario, the maximum possible volume of a batch fuel spill (350 m<sup>3</sup>) would be released. The tug boats, accommodation vessel and supply vessels that will be used in the Nearshore Study Area will use marine fuel oil, which is similar in composition and spill behaviour to diesel fuel. Batch spills are considered instantaneous events and are modelled by considering surface spreading, dispersion, emulsification and drift of a single patch (slick) of hydrocarbons. Under certain wind and ocean current conditions, the spill may reach the shoreline prior to complete evaporation and dispersion. The average summer and winter conditions were modelled based on wind speed and water temperature. There are few differences in the fate of the spills between the two seasons. The summer scenario is likely more relevant as nearshore activities involving tow-out and the deep-water mating site are expected to be completed during spring and or summer; however, the winter data show the range of possible spill fates. During summer, discharges are expected to lose approximately 37 percent of the fuel to evaporation, whereas during the winter scenario, the model suggests approximately 25 percent of the fuel evaporates. The slicks varied in minimum and maximum time to reach shore, as well as the estimated slick life at sea, depending on the location where the spill occurred. The minimum survival time of the slick was 0.5 to 1 day, with maximum between 4.5 and 8 days based on historical wind patterns. The nearshore oil spill model is discussed in detail in Section 3.7 and SL Ross (2012). The environmental assessment is based on maximum possible release (350 m<sup>3</sup>) of diesel fuel reaching the identified Sensitive Areas.

#### Placentia Bay Extension Ecologically and Biologically Significant Area

Oil spill trajectory modelling suggests that hydrocarbons from a spill at the Nearshore Project Area will likely remain near the site of the spill and will reach shorelines within 24 to 48 hours, without any spill mitigation or spill response. As this EBSA covers the entire Placentia Bay, any spill has the potential to have an interaction with this Sensitive Area. The potential interactions with ichthyoplankton and spawning fish (Chapter 8), bird life (Chapter 10), marine mammals and sea turtles (Chapter 11) and species at risk (Chapter 12) have been previously discussed. The potential interactions with specific coastal habitats such as eelgrass beds, capelin beaches and salt marshes are discussed in detail in the following sections. There is potential for localized decline in productivity and for mortality of shoreline vegetation in the short-term; however, it is not

expected to be at a level beyond which natural recruitment would return the population to former levels within several generations.

### Eelgrass Beds

Seagrasses, including the local species of eelgrass (*Zostera marina*), are sensitive to exposure to hydrocarbons, which could result from an accidental release of diesel. Possible interactions could include uptake of hydrocarbons or the oiling of leaves, which may cause the plants to lose their leaves (Dean et al. 1998). Direct oiling is more likely to occur in very shallow water where the eelgrass sits at the surface and is exposed to the hydrocarbon slick; however, direct oiling is uncommon (Den Hartog and Jacobs 1980). The greater concern is the uptake of hydrocarbons by the plant from the water column (Den Hartog and Jacobs 1980). The presence of hydrocarbons in the water column may cause non-lethal physiological effects or the mortality of individual plants if there are moderate to high concentrations in the water column for a few hours, or low concentrations of hydrocarbons that persist over a few days (Fingas 2001); however, no effect may also be observed (Short and Wyllie-Echeverria 1996). The potential effects from oiling on eelgrass may be greater in sheltered areas that have little mixing and flushing action since oil will tend to persist for longer (Dean and Jewett 2001). Seasonal variation can also affect the duration and extent of a hydrocarbon spill, as well as potential effects on the eelgrass life cycle.

Large oil spills that have occurred in temperate coastal areas such as the *Exxon Valdez* oil spill in Prince William Sound, Alaska (1989) and the *Amoco Cadiz* spill near coast of Brittany, France (1978), have provided the opportunity to observe the effects of hydrocarbons on eelgrass communities (Jacobs 1980; Den Hartog and Jacobs 1980; Jewett and Dean 1997; Dean et al. 1998; Peterson et al. 2003). Eelgrass communities are able to recover within a few years, although the effects of hydrocarbon pollution on the associated fauna may take much longer to reverse as they tend to be more sensitive than the plants themselves. The potential environmental effects of diesel oil on eelgrass are not well studied. One incident in Newfoundland involved the accidental release of diesel fuel on a road near Bonne Bay, NL during berm construction activities in 1999. It was documented to cause a die-off of eelgrass in the adjacent coastal area (Hanson 2004). Diesel oil can be more toxic than crude oil in the short-term. Eelgrass communities were compared at oiled and non-oiled (reference) sites between 1990 and 1995 in Prince William Sound following the *Exxon Valdez* oil spill (Dean et al. 1998). At the oiled sites, direct effects (i.e., lower densities) appeared to be minimal and were not observed after one year. By 1991, communities had recovered and there was no difference observed in shoot density or flowering shoot density between sites. A second study (Jewett and Dean 1997) examined the effects of the *Exxon Valdez* oil spill on invertebrates and fish associated with eelgrass beds at oiled and reference sites and observed statistically significant differences. Common taxa including infaunal amphipods, infaunal bivalves, helmet crabs (*Telmessus cheiragonus*) and leather stars were less abundant at oiled sites than at reference sites in 1990. However, other taxa, particularly opportunistic or stress-tolerant taxa, including infaunal polychaetes and gastropods, epifauna polychaetes and mussels, were more abundant at oiled sites versus reference sites, in association with high PAH concentrations. Six years after the spill, there was evidence of recovery of most (but not all) taxa. Low levels of hydrocarbon contamination were still detectable at some sites. Some species, including sea stars and the helmet crab, were still more abundant at reference sites than at oiled sites (Jewett and Dean 1997). Pacific cod (*Gadus macrocephalus*) was the most

abundant fish species in the eelgrass communities, and small (less than 15 cm) cod were substantially more abundant at oiled sites than reference sites, whereas the abundance of large cod did not differ between oiled and reference sites (Jewett and Dean 1997). The authors hypothesize that differences observed in species abundance between oiled and reference sites may be due to an increased food supply for stress-tolerant species provided by increased bacteria at the oiled sites, or that decreased competition and/or competition allowed for increased abundance at oiled sites. Alternatively, differences in the sites themselves (i.e., exposure, hydrography, productivity, nearshore community) may explain the differences observed, regardless of the presence of oil (Jewett and Dean 1997).

The observations made in Prince William Sound, Alaska, are similar to those reported by Den Hartog and Jacobs (1980) following the *Amoco Cadiz* oil spill off France. In this case, the eelgrass community near Roscoff, France, was studied from 1976 to 1978 (pre-spill), and following the 1978 oil spill that covered these eelgrass beds; the study continued in order to document the observed environmental effects. In the short term, eelgrass plants had black (burnt) leaves, which were shed (the shedding of leaves is part of the lifecycle of eelgrass). Over the longer-term, the eelgrass beds showed little effect from the spill. However, the effects of the oil spill on mobile invertebrate fauna were highly variable (Den Hartog and Jacobs 1980). The study found that observed effects on members of phylum Gastropoda were minimal, and that species belonging to Cumacea, Tanaidacea and Echinodermata recovered within a year, however those belonging to phylum Amphipoda experienced substantial declines. Of the 26 species of amphipoda that occurred before the spill, five species were observed at heavily oiled sites after the spill (Den Hartog and Jacobs 1980). Amphipods are known to be highly sensitive to hydrocarbon pollution (Lee et al. 1977; Busdosh 1981; Wolfe et al. 1996). The *Amoco Cadiz* spill occurred in spring prior to rapid growth of the eelgrass and following the winter peak of a number of littoral organisms. The environmental effects of hydrocarbon pollution during the summer peak of eelgrass biomass may differ (Den Hartog and Jacobs 1980).

Peterson et al. (2003) studied the longer-term effects of oil exposure on coastal systems in Alaska. Their study concluded that the oil from the *Exxon Valdez* spill had been more persistent than was anticipated. Peterson et al. (2003) found toxic subsurface oil had persisted much longer than anticipated, and long-term chronic effects had been observed, with the intertidal zone experiencing the greatest effects. Few long-term effects were observed in the subtidal zone. Effects were observed to occur via multiple pathways, and ecological cascades (shifts in communities) had occurred.

To date, there is little primary literature available on the observed effects of the April 2010 *Deepwater Horizon* oil spill in the Gulf of Mexico on eelgrass beds. A study of coastal fishes using seagrass nursery habitat in the Gulf of Mexico compared cohorts from 2006 to 2010 (sampled from July to October) in order to assess the potential effect of the *Deepwater Horizon* oil spill on early fish stages (Fodrie and Heck 2011). There were no decreases in recently settled juvenile abundance in eelgrass habitats at 12 sites from Chandeleur Islands, Louisiana, to Saint Joseph Bay, Florida. Twelve of the twenty common fish species were characterized by statistically higher catch rates in 2010 in comparison to 2006 to 2009. Among the other eight species, catch rates were not statistically distinguishable between pre-spill and post-spill surveys. Species composition of juvenile fish assemblages in the eelgrass beds also did not differ among survey years for any of the sites. Overall, the findings suggest that the 2010 year-class of coastal

fishes using eelgrass habitat were not severely affected by the oil spill in the Gulf of Mexico (Fodrie and Heck 2011). During the Iraq-Kuwait conflict, when an estimated 1,970,000 m<sup>3</sup> (520 million gallons) of crude oil was released (Tawfig and Olsen 1993), there were severe shoreline effects observed on coastal habitats (Jones et al. 1996), but no significant long-term effects to seagrass meadows habitats were documented as the vegetation recovered (Kenworthy et al. 1993; Richmond 1996).

In the unlikely event of an accidental spill of diesel fuel during WREP activities in the Nearshore Study Area, oil spill response plans will be initiated to clean-up and reduce potential environmental effects. Nearshore oil spill modelling (Section 3.7) suggests that a high (55 to 94 percent) proportion of the modelled slicks reach the shoreline due to the close proximity of the spill sites modelled (near Argentia and the two possible deep-water mating sites) to shore and due to the prevailing westerly and southwesterly winds in Placentia Bay. The minimum time to shore from modelling at all three possible spill locations ranged from two to five hours (SL Ross 2012). During the months of March and July, over 55 percent of the modelled spills (diesel slick) reached the shore within less than 24 hours, and more than 75 percent of the modelled spills reached the shoreline within 48 hours. Survival time of the diesel fuel that did not reach the shoreline ranged from a minimum of 0.5 days to 8 days (SL Ross 2012). In the case that a spill reaches coastal areas where eelgrass is present, knowledge to date suggests that damage to eelgrass would be localized and that recovery of the eelgrass can be expected within two or three years (Laurel et al. 2003). The effects of the faunal community associated with eelgrass beds may take several years to recover, or in the case of taxa such as amphipods and some polychaete families, they may take much longer to return to former abundance levels (den Hartog and Jacobs 1980; Jewett and Dean 1997). In addition, crude oil spills have been shown to affect higher trophic levels and to persist in the intertidal sediments for longer than anticipated (Peterson et al. 2003).

Contingency plans developed for construction activities associated with the WREP in and around Argentia and the deep-water mating site in Placentia Bay will take into consideration the variety of coastal habitats, including eelgrass beds. These plans will be in place to quickly initiate response and clean-up measures, with the goal to limit the potential of diesel reaching eelgrass beds and other Sensitive Areas.

In the event of an accidental event or collision in the nearshore results in the release of hydrocarbons, there is a high probability of a diesel slick to reach the shore potentially affecting eelgrass beds. Such an event is unlikely to happen, however due to spill prevention measures. Spill response and contingency plans will limit exposure of Sensitive Areas in the event of a spill. In the highly unlikely event of a worst case hydrocarbon spill in the Nearshore Study Area, potentially affected eelgrass beds and associated invertebrate assemblages are likely to recover within several generations as suggested by studies conducted at previous spill sites.

### **Capelin Beaches**

Pebble beaches are used by spawning capelin in Newfoundland and Labrador (Nakashima and Wheeler 2002; Sjare et al. 2003). Pebble beaches are permeable with an unstable surface layer, and typically have low diversity and abundance of marine life. Oil on pebble beaches is less likely to stay at lower levels of the beach and more likely to concentrate on the upper beach due to wave action, or to become buried in sediment.

A diesel fuel spill as a result of an accidental event or collision occurring in May, June, or July may interact with capelin spawning, eggs and larvae (Paine et al. 1988; Frantzen et al. 2012) (refer to Section 8.5.1.3 for a review of this potential environmental effect on capelin). Natural mortality levels of capelin eggs and larvae are very high; therefore although the effect of a diesel spill on spawning success may be considerable locally if capelin spawning and the diesel fuel spill overlap spatially and temporally, it would likely be undetectable at the population level (Leggett et al. 1983; Rice 1985). Population-level effects would likely require more than 50 percent of the larvae over a substantial portion of the spawning area to be lost (Rice 1985).

An oil spill contingency plan specific to WREP activities in the nearshore of Placentia Bay will be developed accounting for local habitats and conditions and will incorporate response and clean-up measures.

In the case of an accidental hydrocarbon spill reaching the shore, there is potential for marine diesel fuel to become buried in the sediments and to persist for years before natural processes degrade the oil and diminish potential environmental effects. In the event of this unlikely case, long-term effects may affect capelin productivity within the affected area, but not at a population level.

### **Coastal Wetlands**

Although there have been numerous field and laboratory studies of the environmental effects of oil on coastal marshes (Smith et al. 1984; Alexander and Webb 1985; Mendelssohn et al. 1990; Burger 1994; Lin and Mendelssohn 2012), the ability to predict the effects of a spill in Placentia Bay is limited because of the complexity of factors controlling the response of marsh vegetation as well as due to differences in oil type and variation among sites (Pezeshki et al. 2000). Short-term responses of plants to oil exposure include reductions in transpiration and carbon fixation to mortality of plants (DeLaune et al. 1979; Pezeshki and DeLaune 1993). Baker et al. (1990) reports that chronic oil pollution severely reduces marsh grasses and can alter marsh extent. Oil can affect root systems if it penetrates the sediment, and can also affect bacteria populations and the cycling of oxygen. Vegetation (i.e., leaves) that becomes coated in oil can reduce oxygen diffusion and cause root die-off (Baker et al. 1990). Oil adheres to most salt marsh plants and low tidal flow cannot readily wash it off (Baker et al. 1990). Plant recovery is dependent on surviving roots. The worst-case scenario would occur if seedlings and annual plant species were exposed to oil during the spring and summer growth season and there was a large-scale die-off of marsh plants. Temperate salt marsh plants may be capable of recovering from spill events over months to a few years (Baker et al. 1990); however, in other cases, oiled plants have been documented to fail to re-sprout or to recruit seedlings 17 months after oiling (Clarke and Ward 1994). There is also potential for persistence of oil in sediments, as has been reported in cases where the spill involved thick, untreated oil that was stranded on the high marsh during a spring tide in a highly sheltered area (Baker et al. 1993). Teal et al. (1992) reported that oil continued to affect a marsh ecosystem for six years after an oil spill, and that after 20 years, residual effects were “extremely small”, provided the oil remained undisturbed in sediments.

The *Deepwater Horizon* oil spill that occurred in April 2010 released an estimated  $7 \times 10^8$  L (4.4 million barrels) of oil into the northern Gulf of Mexico (Crone and Tolstoy 2010; Reddy et al. 2011) and up to 500,000 tonne of methane and gases (Joye et al.

2011). This resulted in large sections of the Gulf of Mexico coastline encountering oil. DeLaune and Wright (2011) summarized available literature on Gulf of Mexico wetlands from field, greenhouse and laboratory studies and found that under most conditions, marsh vegetation will recover from oil exposure without the need for remediation. The rate of recovery will be dependent on several factors, including magnitude of oiling, amount of oil penetrating the sediment and the sensitivity of particular plant species to oiling. Oil coating of entire plants can cause injury and reduce photosynthesis of the plant and may lead to die-off. However, in the case of the *Deepwater Horizon* spill, the low tidal range meant that most oil entering wetlands would not coat leaves, but could affect roots. The study notes that salt marshes are relatively resistant even after heavy oiling, and cite the return of salt marsh plant shoots in the year following the *Deepwater Horizon* oil spill, even at heavily oiled sites (DeLaune and Wright 2011).

A study of ten salt marshes in Louisiana, Mississippi and Alabama after the oil spill compared unaffected and heavily oiled marsh sites and conducted measurements of sediment contamination to 30 cm (Natter et al. 2012). The study found elevated total organic carbon in contaminated sediments and pore water that was one to two orders of magnitude higher than pristine sites. Elevated total organic carbon was found in sediments both at the sediment surface (top 3 cm) and at depth (30 cm). In contrast, surface water dissolved organic carbon was comparable to that of the unaffected sites. This suggests hydrocarbons are able to persist in sediment for long periods even after oils in water column are dispersed and evaporate (Natter et al. 2012). Substantial degradation of lighter compounds was noted, while heavier oils persisted in sediment (Natter et al. 2012).

Lin and Mendelssohn (2012) studied the potential effects of the oil spill on saltmarsh plants in the northern Gulf of Mexico. Seven months after the spill made landfall with salt marshes in Barataria Bay, Louisiana, concentrations of total petroleum hydrocarbons in the top 2 cm of sediment were as high as 510 mg/g. Sites with heavy oiling experienced high mortality of the two plant species studied (*Spartina alterniflora* and *Juncus*), while moderate oiling affected *Spartina* less than *Juncus*, which experienced decreased above-ground biomass and stem density (Lin and Mendelssohn 2012). A greenhouse study also supported the field results. *Spartina* was found to recover from total oil coverage of shoots within seven months; however, *Juncus* experienced less recovery, and the oiling of soil affected both species (Lin and Mendelssohn 2012).

Salt marshes have been identified near Swift Current in northwestern Placentia Bay, with estuarine influence reaching Sound Island, Woody Island and Bar Haven Island. The nearshore oil spill trajectory modelling (Section 3.7; SL Ross 2012) indicated that there is a 1 to 5 percent probability that oil could reach the outer edges of Sound Island (closest to Swift Current), but would not reach the inner reaches of Swift Current, likely due to the strong freshwater influxes from Piper's Hole and other nearby rivers.

### **Important Bird Areas**

The Placentia Bay and Cape St. Mary's IBAs have been designated as globally important sites for seabirds, shorebirds and migratory birds. In the case of an accidental event there is potential for diesel fuel to contaminate the marine environment and reduce water quality, and potentially affect birds using the IBAs. The potential effects of contamination from a fuel spill on marine birds are further discussed in the Marine Birds chapter (Section 10.5.1.4).



An accidental release of marine diesel fuel has been modelled for the areas where project activities will occur (S.L. Ross 2012) and it is not anticipated to reach the Cape St. Mary's IBA and has a predicted one to five percent chance of reaching the Placentia Bay IBA. (Section 3.7; S.L. Ross 2012).

#### **Otter Haul Outs**

River otters are common in Placentia Bay and exhibit a marine lifestyle. They use several sites as haul out areas and for feeding. In the case of an accidental event, oiling of otters due to the accidental release of diesel fuel in the nearshore is a potential threat, as the fuel can be toxic if ingested and can reduce or remove the insulating ability of fur. A recent study of sea otters (*Enhydra lutris*) in Prince William Sound, Alaska, suggests that hydrocarbons from the 1988 *Exxon Valdez* oil spill have persisted in intertidal sediments, and that otters foraging in the intertidal zone are exposed to the oil (Bodkin et al. 2012). The exposure level is low and may have negligible effect (Neff et al. 2011); however, exposure to lingering oil may contribute to the lack of recovery of sea otters in the region (Bodkin et al. 2002, 2012; Short et al. 2006). The potential interaction is further discussed in the Marine Mammals section (Section 11.5.1.3). In the case of an accidental event, the presence of diesel fuel is not expected to affect otter habitat, but may affect the otters themselves (e.g., sub-lethal effects) (Section 11.5.1.3).

#### **Summary**

Although the likelihood of an oil spill in the Nearshore Study Area from an accidental event or collision occurring is low, spill prevention procedures and contingency planning will be developed to prepare for an accidental event. In the unlikely event of a diesel spill in the Nearshore Study Area, these procedures and plans will be implemented to reduce the severity and duration of interactions between hydrocarbons and Sensitive Areas. Significant residual adverse environmental effects on these Sensitive Areas are therefore not considered likely.

### **13.5.2.2 Offshore**

Sensitive Areas in the Offshore Study Area are discussed in Section 13.3.2 and include EBSAs identified by DFO where there is high productivity and/or aggregations of species, as well as sensitive areas identified by NAFO including VMEs (canyons, seamounts, knolls), coral-sponge area closures and the Bonavista cod box (Figure 13-2). In assessing potential environmental effects of an accidental event on these Sensitive Areas, both the potential habitat effects and the potential effects on species that may be present in the area are addressed. In general, potential effects on species from accidental events are addressed in the assessment undertaken for other VECs, including Fish and Fish Habitat (Chapter 8), Marine Birds (Chapter 10), Marine Mammals and Sea Turtles (Chapter 11) and Species at Risk (Chapter 12).

The hydrocarbon spills considered in this environmental assessment include fuel oil batch spills from vessels or the platform and crude oil blowouts from drilling activities, either subsea or above the surface. Small batch spills could occur from hose ruptures or from platform storage facilities or a vessel collision could result in a larger batch spill. Batch spills are considered instantaneous events. Well blowouts generally involve crude oil (or gas condensate) and natural gas. The volume ratio varies depending on the fluid characteristics and the reservoir itself. Subsea blowouts are classified as shallow or

deep-water, based on how the gas behaves upon exiting and contacting the water. Models for both subsea and surface blowouts were produced by SL Ross (2012), based on oil flow rates of 6,435 m<sup>3</sup> per day and 3,963 m<sup>3</sup> per day for winter and summer subsea blowouts, respectively. These represent the maximum oil flow rate estimated from the reservoir and the reduced flow expected after a 120-day release period. An oil spill is predicted to be persistent under both summer and winter conditions due to formation of water-in-oil emulsions during summer, and because the water is colder than the oil's pour point in winter. Consequently, the natural dispersion would be low, and the oil would remain at the surface for an extended period. After approximately one day of exposure at the water surface, the oil will have lost between 18 and 21 percent of its volume due to evaporation, with the maximum anticipated amount of evaporation over the life of the surface oil is estimated to be 31 to 36 percent (SL Ross 2012).

Based on historical wind and current data, a potential oil spill was modelled for two seasonal periods of year to predict the likely fate of a hydrocarbon spill in the offshore over a 30-day period. The winter zone of influence is smaller than in summer due to strong, persistent westerly winds. The summer wind direction is more variable and the modelled slick moves over a wider area. Overall, a release of crude oil from the Offshore Project Area would persist and surface slicks would remain for several weeks. A very small number of slicks are expected to reach the shore based on models, which predicted that 0.04 percent of the modelled 83,220 oil slicks reached shore in March (nine slicks), October (26) and November (one). The slicks reached the coast 45 to 92 days after the hydrocarbon release without mitigation or any spill response. Details on the oil spill fate and behaviour modeling can be found in Section 3.8 and SL Ross (2012).

SBM whole mud spill modelling was carried out to predict the dispersion footprint and potential effects of an SBM accidental release (AMEC 2012c). These models were based on the synthetic drilling fluid Puredrill IA-35LV with a total density of 1,350 kg/m<sup>3</sup>. Four spill scenarios were considered: a surface tank discharge; a rise flex joint failure (at two different fall velocities); and a BOP disconnect. These scenarios were modelled over varying fall velocities and release times as well as seasons. The maximum deposition footprint occurred in winter for the riser flex joint scenario with the lowest fall velocity and longest release period (three hours). The majority of modelled spills had a footprint of 1,800 m<sup>2</sup> or smaller (e.g., 30 m by 60 m). The smallest footprints (30 m by 30 m) were modelled for the BOP disconnect scenario over a relatively short release time (one hour) and at a high fall velocity. The footprint is expected to be influenced by the time period that SBM is accidentally released, the fall velocities and the variability of the currents. In other modelled scenarios, the maximum distance was 201 m or less from the release site. The SBM model report (AMEC 2012c) notes that there is a trade-off between the area covered by the spill and the thickness of the spill. It can be expected that an area of the seafloor that is relatively flat and with few seafloor features is likely to result in a thinner and widely distributed SBM layer, while a localized depression in the seafloor could retain the received SBM as a thicker layer within a smaller area. It is expected that biodegradation of SBM on the seafloor would occur on a scale of several weeks. Details on the SBM modeling can be found in Section 3.5 and AMEC (2012c).

The following assessment of the potential environmental effects of an accidental event occurring in the Offshore Project Area and reaching a Sensitive Area in the Offshore Study Area is based on a conservative approach and considers such an event occurring at the most sensitive time of the year. Note that spill prevention and contingency plans

will be in place to reduce the likelihood of an accidental event occurring, and the likelihood of hydrocarbons reaching a Sensitive Area.

### **Ecologically and Biologically Significant Areas**

#### *Southeast Shoal and Tail of the Grand Banks Ecologically and Biologically Significant Area*

This EBSA is located 246 km southwest of the Offshore Project Area. It contains a shallow, sandy offshore shoal that is unique in the PBGB-LOMA. In the case of an accidental event, hydrocarbons on the surface on the surface or in the water column could affect the species that use this biologically rich area. Capelin, Atlantic cod and yellowtail flounder spawn in this area, and Atlantic wolffish, marine birds and marine mammals (particularly humpback whales and northern bottlenose whales) aggregate here.

Oil spill trajectory modelling suggests that hydrocarbons from a spill due to a blow-out at the Offshore Project Area have the potential (1 to 10 percent depending on the month modelled) to reach this Sensitive Area in the absence of countermeasures. Any decline in productivity is not expected to be at a level beyond which natural recruitment would not return to the population to former levels within several generations. SBM modelling suggests that SBM from an accidental spill at the Offshore Project Area are unlikely to extend beyond 60 m (maximum) from the release site, and is highly unlikely to reach this Sensitive Area.

#### *Southwest Shelf Edge and Slope Ecologically and Biologically Significant Area*

This EBSA is located to the southwest of the WREP Project Area and much of this area is located outside the Offshore Study Area. It is a highly productive area known for high coral species richness, diversity of groundfish, fish spawning and migration and pelagic seabird diversity and densities, as well as aggregations of cetaceans and leatherback sea turtles during summer. Atlantic cod reside and migrate through this area and were historically present in very high abundance. Redfish and Atlantic haddock both spawn in this area.

Oil spill trajectory modelling suggests that hydrocarbons from a spill at the Offshore Project Area have a very low potential (0 to 1 percent) to reach only the far eastern edge of this EBSA (in the absence of countermeasures), as it is located furthest from the Offshore Project Area of the five EBSAs included in this environmental assessment. Any decline in productivity that occurs at the margin of this EBSA is not expected to be at a level beyond which natural recruitment would not return to the population to former levels within several generations. SBM modelling suggests that SBM is highly unlikely to reach this Sensitive Area.

#### *Lily Canyon-Carson Canyon Ecologically and Biologically Significant Area*

This EBSA is located 148 km to the south of the Offshore Project Area. It is similar to other canyon habitat on the Grand Bank, but it is recognized as unique because Iceland scallop are abundant here, and marine mammals feed and overwinter in the area.

Oil spill trajectory modelling suggests that hydrocarbons from a spill at the Offshore Project Area have a low to moderate potential (5 to 25 percent) to reach the surface waters of this Sensitive Area in the absence of countermeasures. Any decline in productivity is not expected to be at a level beyond which natural recruitment would not return to the population to former levels within several generations. SBM modelling suggests that SBM is highly unlikely to reach this Sensitive Area.

#### *Northeast Shelf and Slope Ecologically and Biologically Significant Area*

This EBSA is the closest Sensitive Area to the Offshore Project Area, at a distance of 37 km to the north and northeast. Habitat in this area supports aggregations of wolffish and Greenland halibut in spring, and aggregations of marine mammals, but the habitat is not considered unique.

Oil spill trajectory modelling suggests that hydrocarbons from a spill at the Offshore Project Area have a low potential (1 to 10 percent) to reach this Sensitive Area in the absence of countermeasures. It is among the most vulnerable of the EBSAs to an oil spill since it is located close to the Offshore Project Area. Any decline in productivity is not expected to be at a level beyond which natural recruitment would not return to the population to former levels within several generations. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

#### *Virgin Rocks Ecologically and Biologically Significant Area*

This EBSA is located 155.5 km to the west and southwest of the Offshore Project Area. The site is considered geologically unique and provides the only near surface rocks on the Grand Banks. Groundfish including Atlantic cod, American plaice and yellowtail flounder spawn near this area. Schools of capelin can be found here along with marine birds that feed on them.

Oil spill trajectory modelling suggests that hydrocarbons from a spill at the Offshore Project Area have a low potential (1 to 5 percent) to reach this EBSA Sensitive Area in the absence of countermeasures. Any decline in productivity is not expected to be at a level beyond which natural recruitment would not return the population to former levels within several generations. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

### **Northwest Atlantic Fisheries Organization Vulnerable Marine Ecosystems**

#### *Canyons*

The canyon VMEs identified in the Offshore Study Area were designated by NAFO because these deep water habitats support diverse and unique marine communities that include fragile, long-lived deep water coral, sponges, and deep sea fishes. Fifteen canyons have been identified as VMEs in the Offshore Study Area (Figure 13-2). The closest canyon is Carson Canyon and it is located 148 km from the Offshore Project Area. All other canyons are located further to the south and southwest.

Oil spill trajectory modelling indicates that hydrocarbons from a spill at the Offshore Project Area have the potential to interact with the canyons (in the absence of countermeasures) (0 to 1 percent at Jukes and Whitbourne Canyons, 5 to 25 percent at

Lily Canyon-Carson Canyon (closest to modelled offshore spill site) and 1 to 25 percent at other canyons). Hydrocarbons reaching the canyons at the surface or within the water column are unlikely to adversely affect sensitive corals and deep sea fishes located at or near the seafloor. The productivity and diversity of this special deep water habitat is therefore not at risk. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

#### *Seamounts and Knolls*

The seamount and knoll VMEs identified in the Offshore Study Area were designated by NAFO because these pelagic shallow habitats support communities of invertebrates that are mostly slow-growing, long-lived, late maturing and experience low natural mortality such as coral and sponge. In addition, seamounts and knolls often attract higher trophic levels. The Newfoundland Seamount chain and Beothuk knoll have been identified as occurring in the Offshore Project Area.

Oil spill trajectory modelling indicates that hydrocarbons from a spill at the Offshore Project Area have the potential to interact with both seamounts and Beothuk Knoll (in the absence of countermeasures). Beothuk Knoll is particularly at risk of interacting with hydrocarbons in the case of an accidental event (10 to 25 percent) due to its location to the southeast of the Offshore Project Area (where modelling projects the oil would disperse given wind conditions). Hydrocarbons reaching the surface or water column surrounding the seamounts and Beothuk Knoll are unlikely to adversely affect the benthic habitat. The productivity and diversity of this habitat is therefore not at risk. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

#### **Northwest Atlantic Fisheries Organization Coral-Sponge Closure Areas**

The coral-sponge closure areas (Figure 13-2) identified in the Offshore Study Area were designated by NAFO because these habitats support diverse marine communities that include fragile, long-lived, deep-water coral and sponges, which increase habitat complexity and structure and support a variety of associated invertebrate and fish communities.

Deep-water coral communities in the Gulf of Mexico were examined at 11 sites three to four months after the well was capped following the *Deepwater Horizon* spill (White et al. 2012). Healthy coral communities were observed at all sites more than 20 km from the spill site. Seven of the 11 sites visited had been studied in September 2009 and appeared unchanged since that time (White et al. 2012). However, at one site 11 km southwest of the spill site, coral was found to exhibit signs of physiological stress, including tissue loss, sclerite enlargement, excess mucous production and bleached ophiuroids (commensal species), and were covered by brown flocculent material. The level of effect on the individual coral colonies was assessed and ranked from zero (least effect) to four (greatest effect). Of the 43 coral colonies photographed at the affected site, 46 percent showed evidence of effects on half the colony, and nearly 25 percent of the colonies were observed to have greater than 90 percent damage (White et al. 2012). This study provides strong evidence for the effect of the oil spill on deep-water ecosystems such as coral colonies.

Oil spill trajectory modelling indicates that hydrocarbons from a spill at the Offshore Project Area have the potential (1 to 50 percent) to interact with coral-sponge closure areas (in the absence of countermeasures). These identified Sensitive Areas are particularly at risk of interacting with hydrocarbons in the case of an accidental event due to their location to the south and east of the Offshore Project Area (where modelling projects the oil would disperse given wind conditions). In the unlikely event that hydrocarbons reach the surface or water column surrounding the coral-sponge closure areas there is potential to affect coral and sponge habitat; in the case of an undersea blowout there is potential for hydrocarbons to reach the benthos and affect coral and sponge habitat directly. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

#### **Bonavista Cod Box**

The Bonavista cod box was recognized as an important area for Atlantic cod and is protected from fishing (except snow crab) and other human activities such as seismic testing.

Oil spill trajectory modelling indicates that hydrocarbons from a spill at the Offshore Project Area have a low potential (1 percent) to interact with the Bonavista cod box due to its location in the far northwest corner of the Offshore Study Area. Hydrocarbons reaching the surface or water column surrounding have the potential to interact with Atlantic cod eggs and larvae during spawning season. This potential effect is further discussed in Fish Species at Risk (Section 12.4.2.2). Any decline in productivity is not expected to be at a level beyond which natural recruitment would not return to the population to former levels within several generations. SBM modelling suggests that SBM is unlikely to reach this Sensitive Area.

#### **Summary**

The potential for adverse environmental effects to occur as result of WREP activities is considered unlikely given the low probability for an accidental event occurring and the intervening distance between a spill and most Sensitive Areas. An assessment of the potential environmental effects on Sensitive Areas as a result of an accidental event during WREP activities in the Nearshore or Offshore Study Areas is presented in Table 13-5.

Table 13-5 Environmental Effects Assessment: Accidental Events

WREP Activity	Potential Positive (P) or Negative (N) Environmental Effect	Mitigation Measure	Evaluation Criteria for Assessing Environmental Effects <sup>(A)</sup>						Significance Rating	Level of Confidence	
			Magnitude	Geographic Extent	Frequency	Duration	Reversibility	Ecological/Socio-cultural/Economic Significance			
<b>Nearshore</b>											
Hydrocarbon spill from vessel	Change in habitat quality (N) Mortality (eelgrass of particular concern) (N)	<ul style="list-style-type: none"><li>Emergency Response Contingency Plan</li><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	2	NS	M	
<b>Offshore</b>											
SBM whole mud spill	Change in habitat quality (N)	<ul style="list-style-type: none"><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	3	NS	M	
Subsea hydrocarbon blowout	Change in habitat quality (N)	<ul style="list-style-type: none"><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	3	NS	M	
Crude oil surface spill	Change in habitat quality (N)	<ul style="list-style-type: none"><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	3	NS	M	
Other spills (e.g., fuel, waste materials)	Change in habitat quality (N)	<ul style="list-style-type: none"><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	3	NS	M	
Marine vessel incident (including collision)	Change in habitat quality (N)	<ul style="list-style-type: none"><li>Spill Prevention and Response Plan</li></ul>	L	2	1	2	R	3	NS	M	
<b>Key:</b> <b>Magnitude:</b> N = Negligible (essentially no effect) L = Low: <10 percent of the population or habitat in the Study Area will be affected M = Medium: 11 to 25 percent of the population or habitat in the Study Area will be affected H = High: >25 percent of the population or habitat in the Study Area will be affected  <b>Geographic Extent:</b> 1 = <1 km radius 2 = 1 to 10 km radius 3 = 11 to 100 km radius 4 = 101 to 1,000 km radius 5 = 1,001 to 10,000 km radius 6 = >10,000 km radius			<b>Frequency:</b> 1 = <11 events/year 2 = 11 to 50 events/year 3 = 51 to 100 events/year 4 = 101 to 200 events/year 5 = >200 events/year 6 = continuous  <b>Duration:</b> 1 = <1 month 2 = 1 to 12 months 3 = 13 to 36 months 4 = 37 to 72 months 5 = >72 months			<b>Reversibility (population level):</b> R = Reversible I = Irreversible  <b>Ecological/Socio-cultural/Economic Significance:</b> 1 = Relatively pristine area not affected by human activity 2 = Evidence of existing adverse activity 3 = High level of existing adverse activity			<b>Significance Rating:</b> S = Significant NS = Not Significant P = Positive  <b>Level of Confidence:</b> L = Low level of confidence M = Medium level of confidence H = High level of confidence		
(A) Where there is more than one potential environmental effect, the evaluation criteria rating is assigned to the environmental effect with the greatest potential for harm											

### 13.5.3 Determination of Significance

The overall determination of residual significance (Table 13-6) is based on the definition provided in Section 13.2. It considers the magnitude, geographic extent, duration, frequency, reversibility and ecological context of each environmental effect within the Study Areas, and their interactions, as presented in the preceding analysis (Table 13-5).

**Table 13-6 Residual Environmental Effects Summary: Sensitive Areas**

Residual Environmental Effects Summary: Cumulative Areas			
Phase	Residual Adverse Environmental Effect Rating <sup>(A)</sup>	Level of Confidence	Probability of Occurrence (Likelihood)
Nearshore Construction	NS	H	NA <sup>(B)</sup>
Accidental Events - WHP	NS	M	NA
Accidental Events – Subsea Drill Centre	NS	M	NA
Accidental Events – Potential Future Activities	NS	M	NA
Key:			
<b>Residual Environmental Effects Rating:</b>	<b>Level of Confidence in the Effect Rating:</b>	<b>Probability of Occurrence of Significant Effect:</b>	
S = Significant Adverse Environmental Effect	L = Low level of Confidence	L = Low Probability of Occurrence	
NS = Not Significant Adverse Environmental Effect	M = Medium Level of Confidence	M = Medium Probability of Occurrence	
P = Positive Environmental Effect	H = High level of Confidence	H = High Probability of Occurrence	
NA – Not Applicable			
(A) As determined in consideration of established residual environmental effects rating criteria			
(B) Effect is not predicted to be significant, therefore the probability of occurrence rating is not required under CEEA			

Adverse residual environmental effects are predicted to be not significant for identified Sensitive Areas in the Nearshore Study Areas. In addition, the likelihood of such an event occurring is considered low.

In the highly unlikely event of a spill offshore, spill modelling predicts that the dispersed oil will have a low to moderate chance of interacting with Sensitive Areas. But in no case is it predicted that the Sensitive Areas would be affected on a permanent basis, nor is it predicted that the resident species would be affected in such a way that natural recruitment is unable to return the population or community to its former level (within several generations). Spill prevention and contingency plans will further reduce likelihood of an accidental event. Therefore, the residual adverse environmental effects on Sensitive Areas are rated as not significant.

### 13.5.4 Follow-up and Monitoring

In consideration of the nature, timing and extent of an accidental event associated with a serious WREP-related spill, a monitoring program will be implemented to determine environmental effects related to the event (refer to Section 16.9 for more information on spill response). Monitoring would be particularly important for sensitive or special nearshore areas (e.g., eelgrass beds, capelin beaches and coastal wetlands), where there is greater potential for multi-year environmental effects.



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## **14.0 EFFECTS OF THE ENVIRONMENT ON THE WHITE ROSE EXTENSION PROJECT**

### **14.1 Introduction**

Section 5.3.1 “Physical Environment” of the WREP Scoping Document (C-NLOPB 2012a) requires a description of relevant physical environment parameters including “effects of the environment on the Project”. The environmental effects to be considered pursuant to section 16(1)(a) of CEAA are defined to include, pursuant to section 2(1) of the Act, “any change to the project that may be caused by the environment”.

There is a broad range of effects that the physical environment may have on the WREP. The primary means of mitigating such effects is through sound planning. The WREP is designed to withstand the environmental conditions that occur in the Nearshore and Offshore Project Areas, such as temperature, wind, snow, wave and ice loading, sea ice and icebergs and drainage. In addition, the design life is taken into consideration so that materials are chosen with sufficient durability and corrosion resistance.

This chapter discusses the expected and potential effects of the land-based and marine environment on the WREP’s design, construction and operation. The purpose of this discussion is to identify environmental events of note and their potential risk to activities in the WREP Nearshore and Offshore Project Areas.

### **14.2 Context**

To mitigate the effects of the physical environment on the WREP, there must be adequate planning, design and operations procedures that consider the expected normal and extreme physical environmental conditions that may be encountered. There must also be adequate monitoring and forecasting of physical environment conditions. Through adequate monitoring and forecasting, WREP activities can be adjusted to maintain a safe working environment. All outside activities are affected by the physical environment.

This chapter includes discussions of on-land environment parameters (soil and groundwater quality) in Section 14.3 and marine environment parameters in Sections 14.4 and 14.5 for both the Nearshore (if the WHP development option is selected) and Offshore (both development options) Project Areas, respectively.

### **14.3 On-Land Effects**

#### **14.3.1 Graving Dock Location**

Environmental samples from the construction site indicate little risk to the environment or human health as a result of planned activities (see Section 2.6.3.2). Husky is currently conducting further environmental and geotechnical sampling at the graving dock during the FEED stage of the WREP. The current groundwater investigation will determine the risk of groundwater being drawn from adjacent land during the graving dock excavation and the possibility of any groundwater contamination. Land adjacent to the graving dock has been remediated and during the remediation, groundwater testing indicated the general absence of free-phase separated product (Dillon 2011). Groundwater monitoring

from eight monitoring wells around the perimeter of the Northside Fuel Storage Area (NFSA) in August 2011 revealed petroleum hydrocarbons in five wells ranging from 0.04 to 1.3 mg/L. The impacts are sporadic occurrences and reflective of residual non-point source impacts (K. Knight, PWGSC, pers. comm.).

The results of the current groundwater investigation at the graving dock site will dictate the method and degree of drainage required to maintain a dry facility during the construction of the CGS. There are no known users of groundwater on the Argentinia Peninsula. Appropriate retaining structures and pumps will be designed to minimize the water infiltration and to remove the excess water. Water removed from the graving dock will be pumped to a lined settling pond, where it will be aerated and tested against applicable regulations prior to ocean disposal. This settling pond will also be used to contain and test runoff from the site prior to ocean disposal, once the graving dock construction is complete. Water will be treated as required prior to discharge to ensure compliance with provincial and federal requirements.

### **14.3.2 The Pond**

The graving dock will be excavated using traditional earth-moving equipment, blasting is not expected to be required. Approximately 1,100,000 m<sup>3</sup> of material will be removed, with approximately 250,000 m<sup>3</sup> of this material used to level and grade the area surrounding the graving dock site above existing grade to approximately 8 m above chart datum, to reduce the risk of marine-sourced flooding. The remaining material is intended to be disposed of in The Pond, on the tip of the Argentinia Peninsula, provided it meets established criteria to ensure proper disposal of excavated and dredged material.

Environmental samples from the construction site indicate little risk to the environment or human health as a result of planned activities (see Section 2.6.3.2). However, confirmatory soil sampling will be conducted during excavation of the graving dock. If contamination is detected above applicable guidelines, the material will be moved to a quarantined area and treated, as necessary. Excavation and aeration was considered the preferred remediation method by PWGSC for the NFSA at Argentinia. In fact, the act of excavation, transport and stockpiling of soil essentially resulted in the reduction of contaminant levels to meet the objectives of the remediation (Dillon 2011).

In an effort to minimize the environmental footprint and disturbance to all stakeholders as much as possible, Husky has committed to ensuring proper disposal and use of the excavated and dredged (see Section 14.4.1) material within the Argentinia Peninsula. Husky has assumed environmental responsibility for the material from the AMA, and will test and treat the material as required, for the designated use.

## **14.4 Nearshore Potential Marine Effects**

### **14.4.1 Bathymetry**

Bathymetry is a primary consideration during tow-out of the CGS and for the mooring systems necessary to maintain the position of the CGS at the deep-water mating site during installation of the topsides. However, dredging, proper design of mooring systems and ballasting to an appropriate towing draft will ensure that bottom depth along the tow-out route will not impede the movement of the CGS in the nearshore area.

Husky has completed a bathymetric survey of the CGS tow-out route to ensure adequate water depth exists for the draft of the CGS. The survey identified that dredging will be required in two sections of the tow-out channel. A geotechnical investigation revealed that the soft material within the tow-out corridors can be removed with a trailing suction hopper dredger. A backhoe dredger may be used to along the shoreline to remove any harder material encountered.

Once construction of the CGS is complete, the structure will be floated out of the graving dock and towed to a deep-water mating site in Placentia Bay for installation of the topsides. Two potential deep-water mating sites have been identified, west of Red Island and west of Merasheen Island.

Upon completion of the topsides mating and associated hook-up between the CGS and the topsides, the CGS's designated towing draft will be established by water ballast/deballast activities. Once the towing draft has been established, the structure will remain at this draft until it arrives at the offshore location in the White Rose field. The WHP draft is expected to be approximately 115 m.

#### **14.4.2 Wind, Waves and Currents**

Extreme wind, waves and currents have the potential to increase stress on surfaces, superstructures and vessels and disrupt scheduling of marine operations. Wind, waves and currents will be further considered during construction of the CGS, dredging, towing, mooring system design, installation of topsides and support vessel and ROV operations.

For the nearshore, extreme wind waves and currents can effect towing operations, vessel maneuvering and increase stress on moorings, which can lead to mooring failure. Also, extreme waves and currents can increase stress on or over-top the berm of the graving dock, which is why the grade surrounding the graving dock is being increased to 8 m above chart datum. The location of the graving dock within Argentia Harbour also offers protection from the fetch of Placentia Bay.

Extreme (100-year) wind speeds for the nearshore area of the WREP (Section 4.2.3) are approximately 30 m/s (hourly averaged). The 100-year significant wave height between Argentia Peninsula and Red Island is 9.2 m; it is 12.0 m at the mouth of Placentia Bay. The channel between Marasheen Island and Isle Valen offers shelter from the most severe seas, with a 100-year significant wave height of only 2.3 m.

All wind, wave and current extreme value estimates will be considered in the design of moorings and the operation of vessels and barges.

#### **14.4.3 Tsunamis**

A detailed discussion on tsunamis is provided in Section 4.2.2.3. The following is a summary of observations as related to potential effects.

While tsunamis have been observed in eastern Newfoundland and their effects can be devastating, they are not a frequent occurrence in this part of Canada. Based on the limited historical record, a return period on the order of 50 to 100 years, or longer for a destructive tsunami like the 1929 event, can be estimated. The fact that construction nearshore will take place over approximately 30 months in the next four years, a

relatively short lifetime, means that the likelihood of occurrence during this period is very low and therefore it is estimated there is a low risk of tsunamis effects for the WREP nearshore.

If a tsunami were to occur, effects could include flooding or failure of the berm, interference with towing operations, or increase stress on moorings during topsides mating.

#### **14.4.4 Tides, Water Levels and Storm Surge**

The location and design of the graving dock has considered the risk of flooding from a seawater source. The graving dock location on the east side of the Argentina Peninsula is protected from tidal surges coming into Placentia Bay and the site itself will be raised to 8 m above chart datum to offer flood protection.

Detailed presentation of tidal water levels and possible extreme storm surge at Argentina is provided in Section 4.2.2.5. An extreme storm surge of 0.8 m occurring at the time of a large high tide would result in a water level of 3.4 m relative to chart datum.

All tide, water level, and storm surge extreme estimates will be considered in the design of moorings and the operation of vessels and barges.

#### **14.4.5 Sea Temperature**

Surface sea temperature in the area can fall below 0°C from January to April so that exposure to water at this temperature may pose a risk to personnel and to exposed surfaces. The combination of low air and sea temperature, strong winds, and high waves can lead to vessel or CGS icing. The CGS and WHP are being designed for these types of harsh marine conditions. The towing of the CGS and the WHP will be scheduled to avoid the risk of icing and freezing spray.

#### **14.4.6 Sea Ice and Iceberg**

Pack ice presence in Placentia Bay from year to year is variable, but the maximum frequency of occurrence over 30 years is 15 percent (Section 4.2.4.1). From mid-February through mid- to late-April, the bay experiences first year ice, which can range in thickness from 30 to 120 cm. The mouth of the Bay is more susceptible to incursions of the annual pack, while the bottom of the bay only fills with pack when there are sustained periods of onshore winds. There are few data on the exact thickness of the sea ice in Placentia Bay. Ice thicker than 100 cm is uncommon at the bottom of Placentia Bay; average thicknesses between 30 and 50 cm are the most common. The International Ice Patrol has recorded icebergs in Placentia Bay. Icebergs were recorded in 7 of the 30 years between 1974 and 2003. A total of 30 icebergs were recorded in this period

Sea ice conditions will be monitored and managed in accordance with Husky's existing ice management plan, which will be modified to outline requirements for monitoring and managing sea ice conditions for the construction of the CGS.

#### **14.4.7 Geohazard**

The GSC's seismic hazard map (Natural Resources Canada 2011a) indicated that the nearshore region has low to moderate relative seismic hazard. Natural Resources Canada's map of earthquakes in or near Canada (from 1627 to 2010), illustrate that historically, only small earthquakes of typically Magnitude 3 or 4 occur (Natural Resources Canada 2011b).

#### **14.4.8 Climate Change**

Construction activities onshore will occur during a limited timeframe (an approximately 30-month period in the next four years (Husky 2012a), thus consideration of climate change adaptation over that time is not considered a key concern. It is noted that coastal erosion and flooding have already become a concern in many Atlantic Canadian coastal regions, including areas in Newfoundland and Labrador where erosion has been observed (Government of Newfoundland and Labrador 2012). Thus, the potential for storm surges in the onshore construction area will be considered in planning and preventative measures will be put in place to protect nearshore construction areas as deemed warranted by the construction contractor.

### **14.5 Offshore Potential Marine Effects**

Offshore potential marine effects on the construction and operation of up to four new subsea drill centres were previously assessed in LGL (2007a). Although applicable to the WREP as a whole, this section is therefore mainly focussed on the assessment of potential marine effects on the WHP development of the WREP.

#### **14.5.1 Bathymetry**

Under the WHP development option, the CGS draft of the WHP is expected to be approximately 115 m. The structure will be designed for appropriate interaction with the seabed to ensure proper installation and operation in the water depth range of 115 to 120 m in the White Rose field.

The WHP will be towed to the White Rose field on a route determined from existing bathymetry to accommodate the WHP draft. The route will be surveyed in advance to provide the level of information required to establish a safe and accurate final route. Detailed contingency planning will be developed to manage the tow in the event of bad weather. Continuous weather forecasting will be undertaken during the tow-out, setdown and installation.

At the offshore location, the WHP will be positioned by the four towing vessels. Once the structure has been situated in the correct location and heading, the CGS will be ballasted with water onto the seabed by controlled flooding of cells within the main base caisson. The CGS foundation will penetrate the seabed; therefore, scour protection is not required. Once on the seabed, solid ballast will be placed in specific caisson cells to provide long-term stability for the WHP.

Under the subsea drill centre option, local modification of the bathymetry provides protection to the WREP. Subsea wellheads will need to be placed below the level of the sea floor to be protected from iceberg scour. A trailing suction hopper dredger vessel will

excavate to a measured depth of 9 to 11 m below existing seabed level. The maximum base dimension will be approximately 45 m by 80 m, with one vertical by three horizontal graded sloped sides as required for stability and flowline ramps. Placement of the wellheads and xmas trees at the bottom of the excavated area will ensure that the top of the equipment will be a minimum of 2 to 3 m below the surrounding seabed level, thus providing protection from iceberg scour.

#### **14.5.2 Wind, Waves and Currents**

Waves and currents have the potential to increase stress on surfaces and vessels and disrupt scheduling and operations. The design, installation and operation of the CGS or of the MODU and supporting infrastructure will consider wind, wave and current loads. Wind, wave and current data are typically collected as part of a physical environment monitoring program, which would enhance the physical database for the area.

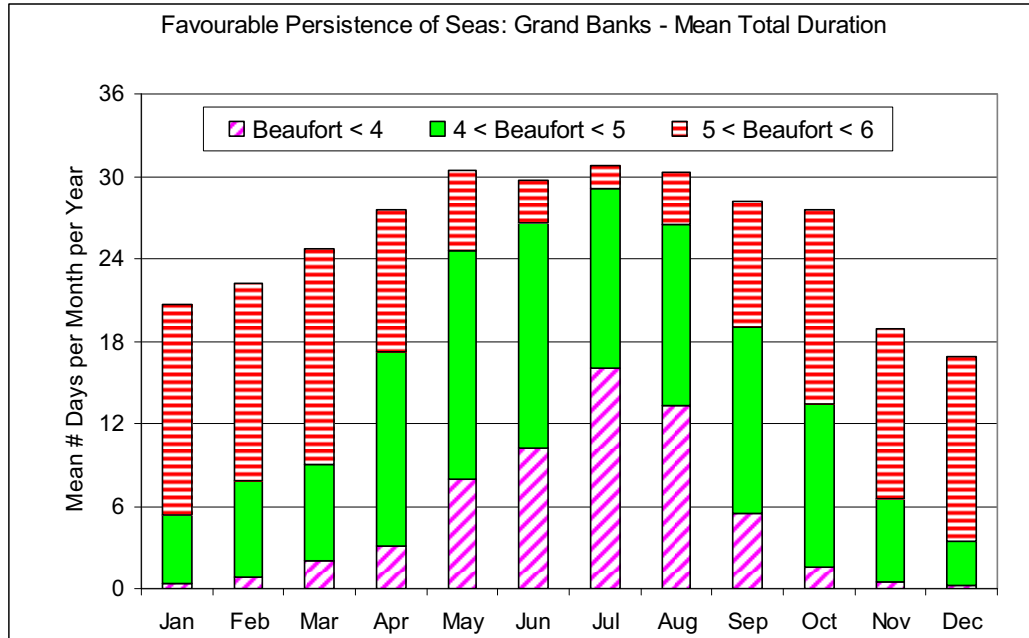
Estimates of extreme wind speeds and significant wave heights for the offshore area of the WREP are presented in Section 4.3.3. The 100-year (hourly averaged) wind speed was estimated at 32.0 m/s and the 100-year significant wave height at 15.0 m. Estimates of extreme current speeds at White Rose are presented in Husky (2011). The 100-year current speeds were estimated at 1.7, 0.7 and 0.8 m/s, respectively, for near surface, mid-depth and near bottom. The WREP infrastructures will be designed to withstand such extreme environmental parameters.

Wave conditions offshore will limit supply vessel loading and offloading of cargo to the WHP or offshore drilling rig. In addition vessel iceberg towing and spill response operations, if required, could be affected. The sea state may limit the safety and effectiveness of supply vessel operations (e.g., deployment and use of spill containment equipment, or the deflection of icebergs).

As one illustration, Figure 14-1, based on favourable persistence analysis of historical Grand Banks conditions, reports the average length of time that, in any given month, seas will persist below the given Beaufort Force (BF) sea state thresholds. The intent of the work was to quantify conditions, as well as show that while recognizing seas can get quite large on the Grand Banks, there are windows of opportunity that, depending on the threshold, may be conducive to marine operations. For example, in November to February, less than one day per month could be expected when conditions are below BF4 ( $H_s=1.5$  m), while in June to August, it is over 10 days per month. Looking at the BF6 scale, in the winter, approximately 8 to 12 days per month when conditions persist above BF6 (i.e., waves over 4 m, near gale force or higher) could be anticipated. Conversely, in the summer these conditions will be experienced rarely, as the bars top out at approximately 30 days. Clearly, in summer, conditions are more favourable to marine operations.

Another wave-related environmental influence on vessel operations is iceberg towing and deflection, which can be routinely required during ice season. Marine conditions can play an important role in the success of these activities. Several observations (e.g., as described by McClintock et al. (2007)) are noted here in this regard.





Source: AMEC 2004

**Figure 14-1 Favourable Persistence of Seas: Grand Banks - Mean Total Duration**

Propeller washing, generally a successful technique for small ice mass deflection, can be difficult in high seas and reduce its effectiveness. High sea states can further complicate matters, since they may affect the success of radar detection of smaller icebergs and growlers.

Iceberg towing through high sea states can sometimes increase the risk of tow line slippage. Tow techniques, including the two-vessel iceberg net tow (C-CORE 2004), offer benefits of improved safety (including less crew time on back decks of supply vessels) and efficiency in higher sea states, and is one potential mitigation of wave effects on vessel ice operations.

These examples serve to illustrate, that in addition to design considerations, the marine environment will have effects on WREP activities. Husky will establish appropriate plans and procedures for all activities to ensure the safety of personnel, the environment and assets, and to optimize the likelihood for success in all such undertakings.

### 14.5.3 Tsunamis

A detailed discussion on tsunamis is provided in Section 4.3.2.3. The following is a summary of observations as relates to potential effects.

The wave height of a passing tsunami offshore is small, on the order of 1 m or less, and, should a tsunami occur, is not expected to be an issue for the offshore operation, particularly given the long period of the waves. Associated current speeds up to 70 cm/s could possibly be a concern for moorings and hawsers. Tsunamis Warning Systems are aimed at managing coastal risk; however, they may also provide useful mitigative

information for offshore. Given the low likelihood of tsunamis occurrence and the anticipated low consequence should they occur, no tsunamis effects offshore are anticipated.

#### **14.5.4 Tides and Storm Surges**

At the offshore WREP site, combined effects of tides and storm surge (including atmospheric pressure changes) can lead to changes in sea level from 1.54 m below to 1.74 m above mean sea level. This factor will be considered for the tow-out, installation and operation of the WHP, or operation of the MODU.

#### **14.5.5 Sea Temperature**

Sea temperature, combined with strong winds, and high seas, is a contributing factor for marine vessel and structure icing. This will be a consideration most particularly for WREP operations in winter.

#### **14.5.6 Sea Ice and Icebergs**

While the position of White Rose is at the extreme southern limit of the regional ice pack, it does lie to the west of the path of the ice tongue that is formed by the loose pack ice being swept around the Grand Banks by the offshore branch of the Labrador Current. The median sea ice concentrations for the Grand Banks south of 49°N are usually between 4/10 and 6/10 by early February and persist at this concentration through early April, after which they slowly decrease to 1/10th to 4/10ths coverage and recede to above 49°N. The White Rose field can be affected by the seasonal ice tongue. Current patterns are largely dictated by bathymetry, and since the White Rose field is located near the 200 m depth contour, it is subject to incursions of the seasonal ice tongue. Ice concentrations in the tongue vary from 2/10 in light years to 9/10 in extreme years.

The number of icebergs off eastern Canada varies considerably both annually and monthly; the number of icebergs on the Grand Banks peaks in mid-April to late-May and their approach to 48°N varies. Typically, icebergs and pack ice begin drifting south of 48°N around March, signaling the start of the “ice season” on the Grand Banks. According to the IIP and PAL, the number of icebergs reaching the Grand Banks (48 degrees latitude) each year varied from a low of zero in 1966, 2006 and 2011, to a high of 2,202 in 1984. Of these, only a small portion will pass through the White Rose field. While the major iceberg influx falls into the March to June period, iceberg sightings on the approaches to the White Rose field have been made at least once in each month of the year.

The design, installation and operation of the CGS or subsea drill centre infrastructure will consider sea ice and icebergs (the subsea drill centre is a direct mitigation strategy for the incursion of sea ice and icebergs in the Jeanne d’Arc Basin). See Section 16.16 for a summary of ice management practices in the Jeanne d’Arc Basin).

#### **14.5.7 Geohazard**

A geotechnical field program consisting of cone penetration tests and boreholes for the potential well site locations was conducted in 2005 and 2012. While the 2012 survey data are not currently available, the soil stratigraphy can be described as 6 to 15 m of

compact to very dense sands with gravel, overlying layers of very stiff to hard sandy clays and clays, interbedded with very dense sandy silts and sands to depths of at least 30 m. A reinterpretation and simplification of the soil strata shows that there are similarities in soil types and consistent sequences across the White Rose field, although there are substantial differences in strata thicknesses. The review of literature reveals that while the region around the White Rose field does have relatively low seismicity based on the existing regional seismic catalogue, large magnitude (M7 and above) earthquakes have occurred in the region. The stresses driving these events are not well understood and the probable locations of future large earthquakes cannot be robustly forecast.

Husky Oil (2001) presented a peak ground acceleration of 0.03 for a return period of 200 years, based on the findings of Foo and Crouse (1986). Foo and Crouse (1986) suggested that this peak ground acceleration was appropriate for the Hibernia site (located approximately 64 km west of White Rose).

Independent seismic hazard analyses that have been recently conducted for the region of the White Rose field (URS 2006; GSC 2010) indicate much higher peak ground accelerations. The peak ground acceleration for the White Rose field is estimated to be approximately 0.2 g to 0.3 g based on GSC, for a probability of exceedance of 2 percent in 50 years (GSC 2010). Peak ground accelerations calculated for a 2,500-year return period are an order of magnitude higher (0.323) (URS 2006). PGA calculated for a 200-year return period is more than double the 0.03 peak ground acceleration (0.069) (URS 2006).

The risk levels for operating- and safety-level earthquakes are usually determined by the facility owner (URS Corporation 2006).

#### **14.5.8 Climate Change**

A detailed discussion on Climate Change is provided in Section 4.3.9. The following is a summary of considerations for the offshore WREP:

- Sea-level rise: Estimates of sea level rise globally over the next 50 years due to climate change alone are from 10 cm to as much as 30 cm. The productive life of the WREP is currently estimated at 25 years; therefore, sea level rise to some degree may occur. The design of the CGS should account for sea level rise.
- Waves: Increased storm intensity may result in higher associated peak wave heights and more frequent occurrence of extreme wave events; however, climate simulations for the next century show almost no change in peak significant wave heights for the western North Atlantic, consistent with recent trends in observed data. With increase temperature, more tropical storms can be expected to survive farther north, bringing with them higher waves during the tropical storm season. The design of the CGS or the selection of the MODU should account for more frequent occurrence of peak wave heights. This could also affect operation of the WREP by potentially increasing unexpected maintenance due to storm damage, as well as increasing the likelihood of evacuation during extreme adverse weather. Access by supply vessels and helicopters may be affected, the prime effect being an increase in the days in which travel is restricted due to extreme weather events.

- **Sea Surface Temperatures:** there is considerable uncertainty as to the question of warming sea surface temperatures, since glacial melt north of Newfoundland would exert a cooling influence on the offshore waters. A slight change of sea surface temperature may not directly affect the WREP but may contribute to increase storm frequency and icing intensity.
- **Precipitations:** annual precipitation increases projected for Atlantic Canada between years 2020 and 2080 range from 18 to 21. The predicted warmer fall and winter temperatures could mean later freeze up; wetter, heavier snow; more liquid precipitation occurring later into the fall; and possibly more freezing precipitation during both seasons. The design of the CGS and WHP topsides or selection of the MODU should account for possible increase in freezing precipitation and snow weight.
- **Air Temperature:** the warming trend may cause breakup of sea ice and melting of glaciers, increasing the numbers of icebergs and potential hazards in North Atlantic shipping lanes. Over longer periods, climate change effects are projected to reduce the thickness and extent of sea ice.

The WREP will be designed to withstand these possible variations in normal and extreme marine environment conditions that can be estimated and effectively mitigated.

#### **14.5.9 Biofouling**

Biofouling epiflora and epifauna are usually found in the photic zone, and studies in the North Sea found the species found in the upper 50 m comprised primarily of seaweeds, hydroids, soft corals, anemones and mussels. The biofouling communities below 50 m are primarily comprised of hydroids, soft corals, anemones and tubeworms (Welaptega 1993, in Husky Oil 2000).

Based on experience at the Hibernia platform, biofouling epifauna and epiflora do attach themselves to the walls of the Hibernia platform within the depths of light penetration. However, they do not impede visual inspections, nor do they contribute to fatigue or corrosion to the infrastructure of the platform (Hibernia Management and Development Company 2005).

#### **14.6 Environmental Events**

The selection of appropriate events is a key to identifying risks that are most realistic within the context of the assessment. In order to accomplish this, it is necessary to address a wide range of events. Those events that could be considered as having a potential effect, together with indication of mitigations that should be implemented to reduce the hazard are listed in Table 14-1.

**Table 14-1 Environmental Effects on the White Rose Extension Project**

<b>Environmental Event</b>	<b>Mitigation</b>
<b>On-land Events</b>	
Potential contaminated soil during excavation of the graving dock	Testing during excavation, treatment as required for regulatory compliance for commercial use, or disposal
<b>Nearshore Events</b>	
Waves – barge, tug or support vessel operations	Safe Operating Procedures, Site Monitoring/Forecasts
Waves – access to CGS at deep-water mating site	Safe Operating Procedures, Site Monitoring/Forecasts/FEED/Facility Design
Waves – graving dock berm failure	Site Monitoring/Forecasts/FEED/Facility Design
Waves/Currents – mooring failure	Site Monitoring/Forecasts/FEED/Facility Design
Tsunamis – flooding and damage	Warning Systems
Storm surges/high water levels – flooding and damage to graving dock/berm	Facility Design/Site Monitoring/Forecasts
Sea Temperature – contributor to vessel and structure icing potential	Site Monitoring/Forecasts
Sea Temperature – exposure to personnel	Safe Operating Procedures
<b>Offshore Events</b>	
Waves – tug or support vessel operations (e.g., ice, spill response, search and rescue)	Safe Operating Procedures, Site Monitoring/Forecasts
Waves/Low water level – affecting CGS installation on seabed	Safe Operating Procedures, Site Monitoring/Forecasts/FEED/Facility Design
Sea Temperature – contributor to vessel and structure icing potential	Site Monitoring/Forecasts/FEED/Facility Design
Sea Temperature – exposure to personnel	Safe Operating Procedures
Seasonally-occurring Sea Ice and Icebergs	Ice Management Plan/FEED/Facility Design
Climate Change – sea level rise	FEED/Facility Design
Climate Change – waves	FEED/Facility Design
Climate Change – sea surface temperature	FEED/Facility Design

### 14.6.1 Mitigation Measures

There is a broad range of effects which the physical environment may have on the WREP. The primary means of mitigating such effects is through detailed engineering, design and sound planning, including testing (and treatment, if necessary). All engineering design will adhere to national/international standards. These standards document the proper engineering design for site-specific normal and extreme physical environmental conditions and provide design criteria that the regulatory agencies consider satisfactory for withstanding the potential physical environmental conditions. These codes consider physical environmental criteria such as temperature, wind, snow, wave and ice loading and drainage. In addition, the design life is taken into consideration so that materials are chosen with sufficient durability and corrosion resistance. Husky has an ice management plan for its existing operations in the White Rose field. This plan will be modified to incorporate the WREP offshore location. If the WHP development

option is selected, then the existing ice management plan will be modified to include activities to be conducted in Argentia/Placentia Bay. The existing ice management practices used by Husky provide a safe environment and minimize operational disruptions caused by ice. Currently, Husky's ice management is comprised of detection, monitoring and assessment and physical management (see Section 16.16).

#### **14.6.2 Definition of Significance**

A significant effect of the environment on the WREP is determined to be one that:

- Harms WREP personnel or the public
- Results in a substantial delay in construction (e.g., more than one season) or shutdown of producing operations
- Damages infrastructure and compromises public safety
- Damages infrastructure to the extent that repair is not economically or technically feasible.

It should be noted that:

- Tsunami frequency or likelihood is improbable for nearshore and remote for offshore
- There is uncertainty as to climate change events.

#### **14.7 Conclusion**

The WREP design and operations planning incorporates metocean criteria for specific nearshore and offshore conditions. Physical metocean site monitoring will be undertaken.

Due to the existing Ice Management Plan, the effects of ice, including icebergs, on the WREP (such as making contact with the WHP or MODU or severing a flowline) are predicted to be minimal. If the WHP development option is selected, the design basis for the CGS will incorporate the potential for structural impact from ice. The subsea drill centre development option incorporates protection from icebergs in its design (i.e., the infrastructure is protected in the excavated subsea drill centre). In addition, Husky has an existing ice management plan, which will result in a minimal effect from sea ice or icebergs on the WREP.

From the results presented above, it is clear that the marine environment will have an effect on the WREP; however, given that the WREP team will commit to apply the all applicable and most appropriate standards for design, planning and development of mitigation measures to maintain risk as low as reasonably practicable, including but not limited to those noted above, there are no likely significant environmental effects on the WREP.

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## 15.0 FOLLOW-UP AND MONITORING

Follow-up and monitoring programs are necessary to: (a) verify the accuracy of the environmental assessment of the WREP; and (b) to determine the effectiveness of any measures taken to mitigate the adverse environmental effects of the WREP. As directed by the *Development Plan Guidelines* (C-NLOPB 2006), these programs will include implementation monitoring, environmental effects monitoring (EEM), compliance monitoring, monitoring of identified Species at Risk, biological observation, physical environmental observation and forecasting. The follow-up and monitoring programs will serve as the primary means of determining and quantifying environmental change caused by the WREP.

The WREP follow-up and monitoring programs are principally divided into two components: EEM and environmental compliance monitoring (ECM). The follow-up and monitoring programs will meet the requirements of applicable federal and provincial regulations and guidelines, as well as the requirements of Husky's internal corporate standards. The following sections address these requirements.

### 15.1 Existing White Rose Offshore Environmental Effects Monitoring Program

An EEM program takes repetitive measurements of environmental variables over time to detect changes caused by external influences directly or indirectly attributable to a specific anthropogenic activity or development (Duinker 1985). Where such changes occur, the program enables their evaluation and the determination of appropriate mitigation measures and project modifications.

An EEM program is iterative, allowing for recurrent opportunities to review the EEM design over the life of a project, to address project changes and to incorporate new and/or improved technologies and methodologies.

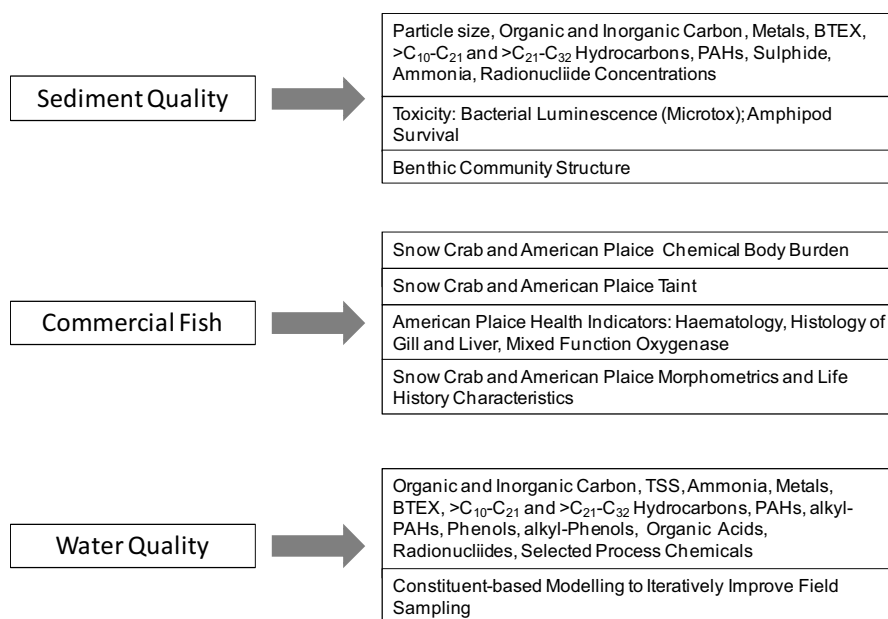
Husky previously committed, in its Environmental Impact Statement (EIS) (Part One of the White Rose Oilfield Comprehensive Study (Husky Oil 2000)), to develop and implement a comprehensive EEM program for the marine receiving environment with regards to Husky's activities at the White Rose field. This commitment was integrated into Decision 2001.01 (Canada-Newfoundland Offshore Petroleum Board 2001) as a condition of project approval. Husky's EEM program design was submitted to the C-NLOPB in May 2004 and was approved for implementation in July 2004. The design drew on information provided in the White Rose EIS (Husky Oil 2000), drill cuttings and produced water dispersion modelling for White Rose (Hodgins and Hodgins 2000), the White Rose Baseline Characterization program carried out in 2000 and 2002 (Husky 2001, 2003), stakeholder consultations and consultations with regulatory agencies. A revised version of the EEM program design document, modified to accommodate the development of the NADC, was submitted to the C-NLOPB in July 2008. The program was revised again in 2010 to include a water quality monitoring component. The existing program will be further revised to include the WHP or subsea drill centre of the WREP, as necessary.

The objectives of the White Rose EEM program are:

- To estimate the zone of influence of project contaminants
- To provide feedback to Husky for project management decisions requiring modification of operations practices where/when necessary
- To provide a scientifically-defensible synthesis, analysis and interpretation of data.

### 15.1.1 Monitoring Components

The White Rose EEM program is divided into three components, dealing with effects on sediment quality, commercial fish species and water quality (Figure 15-1).



Notes: BTEX: Benzene, toluene, ethylbenzene, xylene; PAH: Polyaromatic hydrocarbon; TSS: Total suspended solids

**Figure 15-1 Environmental Effects Monitoring Program Components**

Assessment of sediment quality includes measurement of alterations in chemical and physical characteristics, measurement of sediment toxicity and assessment of benthic community structure. These three sets of measurements are commonly known as the sediment quality triad (Long and Chapman 1985; Chapman et al. 1987, 1991; Chapman 1992). These tests are used to assess drilling effects. Potential deposition of selected constituents from liquid discharges to sediments is also assessed as part of the sediment quality program.

Assessment of effects on commercial fish species includes measurement of chemical body burden, taint, morphometric and life history characteristics for snow crab and American plaice, as well as measurement of various health indices for American plaice.

Assessment of water quality includes the measurement of change in physical and chemical characteristics in the water column. Because contamination from liquid discharges from offshore installations is difficult to detect, modelling is undertaken to identify constituents that have a higher chance of detection.

### **15.1.2 Environmental Effects Monitoring Sampling Design**

Sediment samples are collected at stations in the vicinity of drill centres and at a series of stations located at varying distances from drill centres, extending to a maximum of 28 km along north-south, east-west, northwest-southeast and northeast-southwest axes. The sediment sampling design is commonly referred to as a gradient design. This type of design assesses change in monitoring variables with distance from source.

Commercial fish are sampled near White Rose, in the vicinity of the drill centres, and at four distant reference areas located approximately 28 km to the northeast, northwest, southeast and southwest.

Water samples are collected in the vicinity of the *SeaRose FPSO* facility and in two reference areas located approximately 28 km to the northeast and northwest. The water quality and commercial fish designs are control-impact designs (Green 1979). This design compares conditions near discharge sources to condition in areas unaffected by the discharges.

Husky will re-design the existing EEM program to incorporate the new drill location in the West White Rose pool. As there will be no change to the discharge of produced water from the *SeaRose FPSO*, there will be no change to the water quality program. The focus of the program will be the collection of sediment in the vicinity of the drilling platform (WHP or subsea drill centre) and commercial fish samples around the edge of the safety zone. The West White Rose drill centre or WHP will be within the current safety zone for the White Rose field.

In addition, in the event of an accidental release of oil in the White Rose field, a spill EEM program will be determined based on criteria established with Husky's offshore Oil Spill Response Plan.

## **15.2 Environmental Compliance Monitoring**

ECM is actively conducted to ensure compliance with all regulatory and self-imposed environmental requirements. ECM provides regulators and the public with evidence that environmental regulations and standards are followed.

### 15.2.1 Nearshore Environmental Compliance Monitoring

Husky will develop a site-specific environmental protection plan (EPP) for the activities associated with graving dock excavation and CSG construction at Argentia under the WHP development option, including those activities requiring compliance monitoring pursuant to legislation and guidelines. Such legislation and guidelines include, but are not limited to:

- *Fisheries Act* Section 36
- *Fisheries Act* Section 32
- *Migratory Birds Convention Act, 1994*, Section 35
- *Canada Shipping Act, 2001, Vessel Pollution and Dangerous Chemicals Regulations*
- *Fisheries Act* Authorization for Works or Undertakings Affecting Fish Habitat (issued by Fisheries and Oceans Canada)
- Newfoundland and Labrador *Water Resources Act* Permit to Alter a Body of Water
- Newfoundland and Labrador *Environmental Control Water and Sewer Regulations* for waste water discharge
- NLDEC *Guidance Documents on Dredge Spoils Disposal* (GD-PPD-028.1) and *Leachable Toxic Waste, Testing and Disposal* (GD-PPD-026.1).

### 15.2.2 Offshore Environmental Compliance Monitoring

Waste discharges during either development option for the WREP could include water-based drill muds and cuttings, grey and black water, ballast water, bilge water, deck drainage, discharges from machinery spaces, cement, blowout preventer fluid and air emissions. All waste discharges associated with the operation of the *SeaRose FPSO* have been previously assessed and permitted and continue to be monitored through ECM and EEM (both part of an EPP).

Husky's current EEM program will be revised to include assessment of the effects of discharges related to the WHP or any new subsea drill centres.

Should development of the WREP occur via a new subsea drill centre, Husky has an approved Environmental Protection Compliance Monitoring Plan in place for MODU operations. Husky will continue to fully comply with the OWTG and will develop an Environmental Protection Compliance Monitoring Plan for the WHP. Husky's existing comprehensive offshore Waste Management Plan will be revised and adapted to include the WHP as necessary.

Husky will apply for an ocean disposal permit and will adhere to ocean disposal requirements under CEPA for disposal of dredge spoil from any future subsea drill centres.

A fish habitat compensation agreement (Authorization No. 07-01-002) has been in place with DFO since 2007 to compensate for the excavation of up to five subsea drill centre sites, of which only two have been excavated to date (the NADC and SWRX). The construction of a subsea drill centre for the West White Rose pool was one of the potential subsea drill centres assessed and compensated for in 2007.

### 15.3 Other Required Programs

Monitoring programs (and reporting) for various VECs during certain activities associated with the WREP may be required as conditions associated with the issuance of permits/authorizations pursuant to C-NLOPB guidelines and regulatory requirements. These may include, but are not limited to:

- As per requirements under its fish habitat compensation approval (Authorization No. 07-01-002 - for up to five subsea drill centres), Husky will continue to conduct the fish habitat compensation monitoring program in North Harbour. The requirements for further fish habitat compensation and monitoring will be discussed with DFO in light of changes to the *Fisheries Act*.
- The existing White Rose field physical environmental data collection and reporting program will include the new drilling activities in the West White Rose pool area.
- Geophysical programs for the WREP will be limited to geotechnical and geohazard programs (e.g., VSP). Marine mammal and sea turtle monitoring and observation will be conducted during any such programs protocols will be consistent with the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012d) and where necessary, marine bird observations will be undertaken as per the pelagic marine bird monitoring protocol developed by the Canadian Wildlife Service.
- Compliance monitoring will be conducted to ensure that any conditions applied to any *Navigable Waters Protection Act* authorizations are implemented as outlined by the Navigable Waters Protection Program of Transport Canada.

### 15.4 Environmental Assessment Validation

Various program activities during the life of the WREP (e.g., dredging, drilling, geotechnical and geohazard surveys) will require authorization under the Atlantic Accord Acts. Any such authorizations (at the discretion of the C-NLOPB) may be valid for one to five years. As authorizations are renewed or new ones are required during the life of the WREP, Husky will submit an environmental assessment update to the C-NLOPB and federal regulatory authorities that:

- Confirm that the scope and nature of activities planned and addressed under this environmental assessment have not changed
- Update the list of species at risk that could potentially occur in the Nearshore and Offshore Project and Study Areas (including review of Recovery Strategies and Management Plans)

- Confirm current fishing activities in the Nearshore and Offshore Project Areas have not changed
- Confirm commitments made in the environmental assessment are being met
- Confirm mitigation measures proposed in the environmental assessment are being applied.

Husky will continue to consult with stakeholders, including fishers, regarding ongoing operations, as necessary.

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## 16.0 ENVIRONMENTAL MANAGEMENT

### 16.1 Husky's Management System

Husky's Operational Integrity Management System (HOIMS) covers all of Husky's businesses, with particular emphasis on projects and operations, and manages operational integrity through the life-cycle of the assets. HOIMS includes 14 elements, with each element containing well-defined aims and a clear set of expectations. These expectations guide Husky employees in effectively managing the risks associated with Husky's business and creating a safe and secure place to work. The 14 elements of HOIMS are listed in Table 16-1.

Management is responsible for ensuring effective systems and procedures are implemented and adequate resources are made available to meet the HOIMS expectations. Business units, operating districts, facilities and functional areas will implement HOIMS. The resources applied will be consistent with the evaluated operational integrity risk.

Achieving conformance to HOIMS expectations requires commitment and sustained efforts over many years. Strong leadership and commitment at all levels of Husky's organization and clearly established responsibilities and accountabilities are key to the success of HOIMS.

**Table 16-1 Husky Operational Integrity Management System Elements**

1	Leadership, Commitment & Accountability	2	Safe Operations
3	Risk Assessment & Management	4	Emergency Preparedness
5	Reliability & Integrity	6	Personnel Competency & Training
7	Incident Management	8	Environmental Stewardship
9	Management of Change	10	Information, Documentation & Effective Communication
11	Compliance Assurance & Regulatory Advocacy	12	Design, Construction, Commissioning, Operating & Decommissioning
13	Contracted Services & Materials	14	Performance Assessment & Continuous Improvement

Resources are applied and dedicated to the implementation of HOIMS, and progress is tracked and monitored at the business units, operating districts, facility, functional areas and corporate levels. Periodic reviews and audits are undertaken to ensure that HOIMS is effectively integrated in Husky's daily operations and to continuously improve Husky's performance.

Husky's environmental management system has its basis in HOIMS. More specifically, Element 8 titled "Environmental Stewardship" sets a clear aim to: *"Operate responsibly to minimize the environmental impact of how we conduct business"* and *"Leave a*

*positive legacy behind us when we leave*". A clear set of expectations details how Husky intends to meet this aim. They are the following:

- 8.1 A process is implemented to assess the risks and potential impacts to the environment associated with our operations. Such assessments are subject to periodic review and, where appropriate, a Life Cycle Value Assessment is carried out.
- 8.2 Management systems are established and specific measures are implemented to eliminate, minimize, prevent, detect, control and mitigate environmental threats. Our first priority is prevention.
- 8.3 Environmental impact is monitored and reported to demonstrate compliance with relevant local, national and international regulations and to ensure that any commitments are honored. Local sites metrics and targets are set to drive continual improvement in managing waste, emissions and discharges and energy efficiency.
- 8.4 A process is implemented to evaluate and manage the specific risks and liabilities associated with decommissioning and reclamation.

Environmental management of Husky Atlantic Region's operations is achieved using a compilation of tools to manage the environmental component of its business. Systems, plans and procedures are in place to manage Husky's environmental commitments, regulatory obligations and stakeholder expectations, as well as areas of risk. All plans and procedures are responsive to applicable legislation and undergo periodic reviews to ensure compliance with legislation.

As a key part of these expectations, all of Husky Atlantic Region's environmental assessments undergo annual reviews. These reviews are to assist Husky in fulfilling its responsibilities under CEAA by ensuring that the scope of the assessment(s) and the mitigations committed to therein remain valid.

## **16.2 Environmental Effects Monitoring**

Husky's EEM program, designed for drilling and production related activities in the White Rose and North Amethyst fields, is intended to provide the primary means to determine and quantify project-induced change in the surrounding environment.

The program design draws on the predictions and information in the White Rose development plan Environmental Impact Statement (EIS) and its supporting modelling studies on drill cuttings and produced water dispersion. A baseline study to document pre-development conditions was conducted in 2000 and 2002. This study, combined with stakeholder and regulatory agency consultations, initiated the detailed design phase of the EEM program. Further input on EEM program design was obtained from an expert advisory group called the White Rose Advisory Group. The White Rose Advisory Group for an integral part of the review process and has provided interpretation and feedback for each EEM program to date.

Where project-induced change in the surrounding environment occurs, the EEM program enables the evaluation of effects and therefore assists in identifying the

appropriate modifications to, or mitigation of, project activities or discharges. Such operational EEM programs also provide information for the C-NLOPB to consider during its periodic reviews of the OWTG (NEB et al. (2010)). Objectives to be met by the EEM program are to:

- Confirm the zone of influence of project contaminants
- Test biological effects predictions made in the EIS
- Provide feedback to Husky for project management decisions requiring modification of operations practices where/when necessary
- Provide a scientifically defensible synthesis, analysis and interpretation of data
- Be cost-effective, making optimal use of personnel, technology and equipment
- Communicate results to the public.

Data are collected on sediment quality, water quality and commercial fish species. EEM components are summarized in Figure 15.1.1.1 (Figure 15-1).

### 16.3 Environmental Compliance Monitoring

Husky is committed to an active program to meet and where possible exceed compliance with all relevant regulatory and corporate requirements. This is achieved through the following objectives:

- Continued focus on meeting compliance targets and guidelines
- Investigate use of most up-to-date technologies and chemical formulations.

This can be implemented through:

- Regular reviews of new and existing regulatory requirements
- Continual review of industry best practices in achieving compliance milestones
- Updating standard operating procedures as necessary to remain in compliance
- Management of key drilling and production contracts and contractors

Management of compliance focuses on the effluent streams that are regulated under the *Canada Oil and Gas Drilling and Production Regulations* and the *Newfoundland Offshore Petroleum Drilling and Production Regulations* (the Drilling and Production Regulations) and any other applicable provincial or federal legislation that may be applicable. The requirements for the *Drilling and Production Regulations* are further defined in the OWTG, which are used to develop facility-specific environmental protection and compliance monitoring plans. Each facility's environmental protection and compliance monitoring plan outlines all compliance monitoring requirements for the facility.

In addition, once received, all monitoring results are reviewed and trending of the respective effluent streams is completed to ensure that compliance limits are met and environmental exceedances are avoided. Meeting compliance targets on effluent streams is a constant challenge operationally that requires continual focus on operational best practices and technologies that could benefit the compliance systems. Husky completes periodic reviews of compliance information in order to determine priorities for improvement initiatives.

## **16.4 Environmental Protection Plan**

Environmental protection planning is an important component of overall project planning and implementation of construction projects. EPPs are often required as part of a project approval by governments following an environmental assessment, before construction occurs. EPPs provide a practical way in which a proponent can demonstrate its understanding of environmental regulations, practices and procedures required to reduce or eliminate the potential environmental effects of a project. An EPP is a working document for use in the field for project personnel and contractors, as well as at the corporate level for ensuring commitments made in policy statements are implemented and monitored. EPPs provide a quick reference for project personnel and regulators to monitor compliance and to make suggestions for improvements.

Husky Energy has committed to the development and implementation of a comprehensive EPP to help ensure a high level of environmental protection throughout its work areas and activities associated with the construction of the CGS in Argentina, NL. The EPP for Construction provides the general protection procedures for the routine activities associated with construction activities anticipated for the WREP and identifies applicable permits, authorizations and approvals, as well as key site-specific conditions of approvals, as appropriate.

The specific purposes of the EPP are to:

- Provide a reference document to ensure that commitments to minimize environmental effects will be met
- Document environmental concerns and appropriate protection measures
- Provide concise and clear instructions to project personnel regarding procedures for protecting the environment and minimizing environmental effects
- Provide a reference document for personnel when planning and/or conducting specific activities and working in specific areas
- Provide a training aid during implementation efforts
- Communicate changes in the program through the revision process
- Provide a reference to applicable legislative requirements and guidelines.

## 16.5 Chemical Selection and Management Procedures

Husky's chemical management system and associated chemical screening procedure describes the procedure to minimize the potential risks to the health and safety of personnel and harm to the environment from the identification, procurement, transport, use, storage and disposal of chemical products and substances on the *SeaRose FPSO* and all drilling-related chemicals on drilling rigs under contract to Husky. All drilling- and production-related chemicals undergo a thorough health, safety and environmental screening based in part on the C-NLOPB's *Offshore Chemical Selection Guidelines for Drilling and Production Activities on Frontier Lands* (NEB et al. 2009).

Husky's chemical management system ensures that:

- Chemicals are managed in compliance with all applicable statutory requirements, codes and industry practices
- The identification, purchase, use, storage, transport and eventual disposal of chemical substances is carried out in a responsible manner that prevents harm to people and the environment
- All chemicals on the *SeaRose FPSO* and all drilling-related chemicals (does not apply to domestic chemicals) on drilling rigs under contract to Husky undergo a health, safety and environmental screening prior to being accepted for use
- All personnel who encounter chemicals in the workplace are adequately trained, Material Safety Data Sheets are provided and accessible, and the risks associated with chemical use are appropriately communicated.

## 16.6 Fisheries Liaison/Interaction Policies and Procedures

Husky has and will continue to work to minimize any interference with the established fishing industry operating in the Newfoundland offshore area. This will be done through various means, including but not necessarily limited to:

- Advisories, when appropriate, of *SeaRose FPSO* movements/re-locations and major operational changes through Notices to Mariners and the CBC Fisheries Broadcast
- Continued participation on the One Ocean Committee. Since its inception in 2002, Husky has maintained membership on the One Ocean Board of Directors as well as the One Ocean Working Group.

One Ocean is a liaison organization established by the fishing and petroleum industries of Newfoundland and Labrador. Under the direction of an industry board, One Ocean promotes mutual understanding between these two vital industries and their common marine environment. The goal of One Ocean is to provide a neutral forum for both sectors to facilitate communication, information exchange and shared opportunities. One Ocean's mandate is to assist the fishing and petroleum industries in understanding each other's operations and activities. The process is based on the initiatives of each industry to endorse cooperation, transparency and a proactive approach to the exploitation of marine resources.

The structure of the One Ocean Industry Board provides balanced representation of both the fishing and petroleum industries, consisting of knowledgeable and active stakeholders from each sector. This structure enhances the opportunity for information dissemination and progressive joint initiatives for two industries operating in one ocean.

- Implementation of the attributable damage compensation described in the Fisheries Damage Compensation Program
- Establishment and enforcement of a safety zone system around the White Rose development installations in consultation with Transport Canada, C-NLOPB, DFO and the One Ocean Working Group.

## **16.7 Fisheries Compensation Program**

Husky undertakes various activities in the Newfoundland and Labrador offshore area. Of these, operations in the White Rose field are currently the largest activity and take place within a relatively small area (approximately 50 km<sup>2</sup>) of NAFO Unit Area 3Lt, which covers approximately 25,000 km<sup>2</sup>. Neither White Rose field activities nor other Husky activities elsewhere in the offshore area are to have substantive operational impacts on commercial fishing vessels, nor to reduce catches in any manner.

Husky recognizes that the fishing industry has a long tradition of fishing on the Grand Banks. Husky has worked with the fishing industry and established efficient and effective mechanisms and procedures that ensure both industries can pursue their operations safely and with the least possible interference and the greatest mutual benefit. Husky will apply that same approach to working with the fishing industry in Placentia Bay.

Husky has developed a Fisheries Damage Compensation Program to address any fisheries-related damages allegedly caused by any of Husky's operations and to compensate for resulting loss. Liaison and consultations between both industries over the life of Husky's operations in the offshore area ensure that any unanticipated problems and issues are addressed and resolved to the mutual satisfaction of both industries. It is also acknowledged that all components of the Fisheries Damage Compensation Program should abide fully with the legislative and regulatory requirements of Canada as described in relevant legislation, such as the *Canada-Newfoundland And Labrador Atlantic Accord Implementation Newfoundland And Labrador Act* and *Compensation Guidelines Respecting Damages Related to Offshore Petroleum Activity* (C-NLOPB and CNSOPB 2002).

## **16.8 Emergency Response**

### **16.8.1 Emergency Response Preparedness**

The HOIMS provides guidance for all operations. Within the HOIMS framework, Element 4 is dedicated to emergency preparedness.



A strong emergency response program ensures the integrity of Husky operations. In the Atlantic Region this is accomplished by:

- A comprehensive response process
- Effective and accessible response documents
- Training
- Emergency Response Team (ERT) commitment.

The *Incident Coordination Plan - EC-M-99-X-PR-00003-001* outlines the necessary resources, personnel, logistics and actions to implement a prompt, coordinated and rational response to any emergency. It offers an efficient and balanced approach to dealing with the issues resulting directly from an emergency.

The plan addresses those situations that result in:

- Concern for current or forecast conditions that cause an operational alert
- Public or regulatory concern for Husky operations
- Direct threats to human safety, or actual injury or death
- Threatened or actual damage to facilities or major equipment
- Terrorism, sabotage, or criminal acts
- Unintentional discharge of materials to the natural environment.

The intention of the plan is to ensure that, in the event of an offshore or onshore emergency, personnel are mobilized onshore as soon as possible to provide the necessary support required by an emergency site.

The plan supplements the site-specific emergency response plans that have been developed for physical response to an installation emergency.

Husky's response philosophy is to think of the scope of the response in light of immediate and future concerns. The focus of Atlantic Region response teams and the escalation of resources during a response reflect three areas of scope:

- Emergency response
- Response management
- Crisis management.

### 16.8.2 Emergency Response Centres/Personnel

The WHP will have designated emergency response personnel. In every case, the crew will be either in the command group, emergency action teams, or unassigned and expected to report to muster stations. The person in charge of the facility (Offshore Installation Manager) will be in command of the response.

Husky's onshore ERT has two components, the Incident Coordination Centre (ICC), which can be mobilized quickly to provide direct support to the facility in distress, and the Regional Response Management Team (RRMT), which may be mobilized immediately after the ICC to manage the issues resulting from the emergency.

Husky's Corporate Response Management Team is available to support the Atlantic Region RRMT and is responsible for issues related to the emergency that affect Husky's corporate profile.

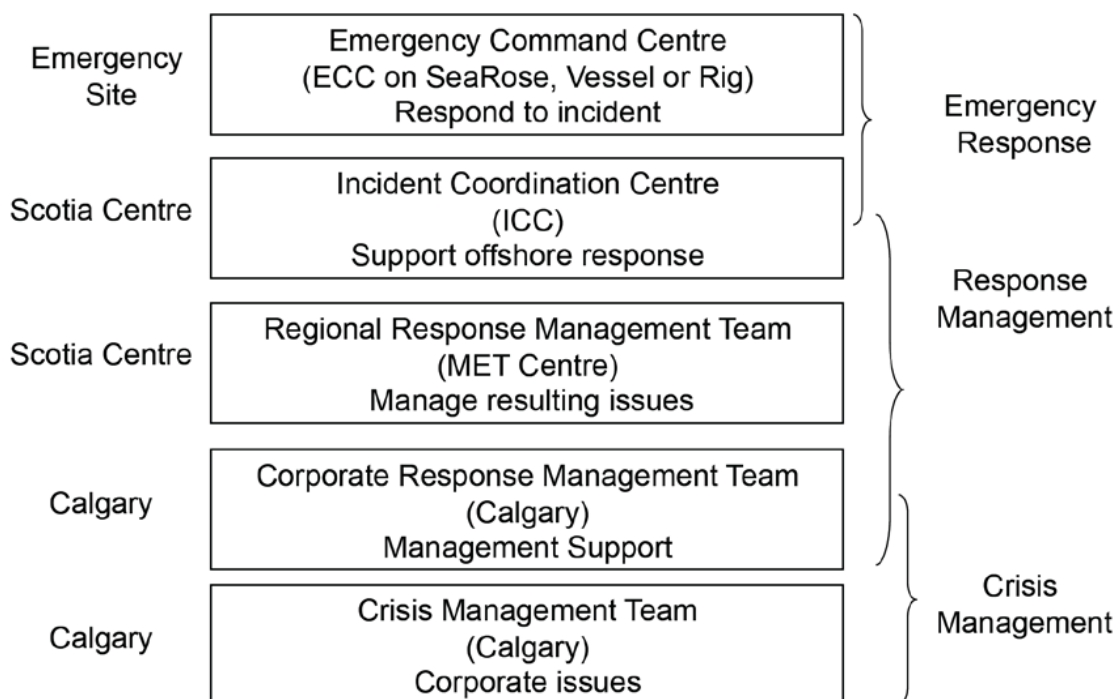
The offshore facility will have a designated area to be used as the emergency command centre during an emergency response.

Onshore, Husky shares an emergency response centre with Suncor. This facility is located adjacent to Husky's St. John's offices and can be activated quickly when required. The facility is fully serviced for communications and consists of:

- A dedicated ICC that is always ready for use
- Dedicated offices for command, communications and human resources
- Telephone response centres for managing additional response communications
- A large area that can be quickly converted from a meeting area to a long-term response centre.

Husky owns and operates a Business Continuity Centre, which is designated to be used in the event of loss of access to the Scotia Centre or if shared facility is being used by Suncor.

Husky's emergency response structure is illustrated in Figure 16-1.



**Figure 16-1 Husky's Emergency Response Structure**

### 16.8.3 Defining the Emergency Event

During the course of Husky's Atlantic Region operations, unplanned events will occur that require immediate attention outside of normal operations. Such events may threaten or cause actual injury to personnel, impact to the environment, or damage to property. As well, there may be events that are not emergencies in terms of impact but are irregular actions that cause regulatory or public concern for the integrity of Husky's operations.

It is important that Husky operational personnel recognize the level of concern that unplanned events, even if minor, may generate. To ensure a proper response, operational personnel are encouraged to report all unplanned events and to discuss the implications of these events with supervisors and emergency response personnel. The Husky emergency response program is based on precautionary notification.

Many emergencies develop over time and require consultation before an emergency is declared. Often there is a common escalation process:

- Situation emerges – discussions with onshore management
- Situation expands – discussions result in declaration of alert
- Situation becomes an emergency – declare an emergency.

#### **16.8.4 Mutual Aid**

Husky has entered into a formal *Mutual Emergency Assistance Agreement* with Grand Banks operators to provide assistance to each other in the event of an emergency. The agreement was drafted in January, 2002, and is renewed frequently.

Assistance may take the form of:

- Exchanging current or forecast ice, weather, or oceanographic information
- Providing MedEvac support from an offshore location
- Providing personnel, vessels, equipment, facilities and other company or contracted resources to assist during an emergency response operation.

#### **16.8.5 Business Continuity**

Normal Husky business activity may be disrupted by any emergency. The most serious business disruption would occur as a result of an emergency that denies access to the Scotia Centre.

While the Husky emergency response process is intended for the response to emergencies related to offshore operations, it can be applied to emergencies that affect Husky's offices at the Scotia Centre. Features of the response include:

- The response to the emergency itself will probably be undertaken by the police and fire services
- Mobilization of an offsite emergency centre
- Husky's short-term concern will be in assessing the situation and in notifying offshore installations and employees
- Husky's longer term concerns will be in how to support offshore operations during a return to normal operations.

#### **16.9 Drills and Exercises**

Drills are a vitally important and integral part of ensuring the emergency preparedness of the organization.

Drills and exercises are planned in such a manner as to ensure that all personnel assigned emergency roles or that could be an alternate in an emergency role receive experience during a drill.

### 16.9.1 Offshore Installation

The offshore installation will develop a schedule of drills based on;

- Specific installation design and operations
- Regulatory requirements
- ERT training requirements
- Canadian East Coast Offshore Petroleum Industry, Training and Qualification Guide.

### 16.9.2 Onshore Emergency Response Team

The onshore ERT receives regular training and exercise experience. The actual number of exercises completed varies depending on level of offshore activity, with a minimum of four exercises completed in a calendar year. Exercise scenarios vary based on actual offshore activity and may be based on the following offshore emergencies;

- Security breach
- Fire and explosion
- Collision
- Oil release
- Hostage taking
- Loss of well control.

## 16.10 Spill Response

Husky has instituted a spill prevention program with an intention of zero spills into the marine environment. Any unintentional discharge (hydrocarbon or otherwise) is considered to be an oil spill and results in an appropriate response and may result in the activation of the *OSR Procedure - East Coast Oil Spill Response Plan (EC-M-99-X-PR-00125-001)*. This document details the response actions to be taken by Husky in the event of an oil spill while operating offshore Newfoundland and Labrador. These procedures are responsive to regulatory requirements for oil spill contingency planning. The plan provides a comprehensive review of:

- Husky's duties when the "responsible party" as defined by various acts and regulations
- Husky's philosophy and policies concerning oil spill response
- The organization of Husky's response efforts, and the evolution of those efforts with the increasing scale of the spill response

- Arrangements for assistance from contractors and other operators
- Environmental issues resulting from an offshore oil spill
- Husky's policies concerning safety, oil spill waste management and training.

#### **16.10.1 Regulatory**

Under the Atlantic Accord, C-NLOPB is responsible for the regulation of all spills at offshore drilling and production operations.

#### **16.10.2 Spill Management**

For response planning purposes, oil spill events are classified as tiers. The parameters to be considered in selecting the appropriate level of response include:

- Size and nature of the oil spill
- Environmental and operational conditions at the time of the spill
- Vessel and equipment availability
- Numbers and qualifications of personnel available at site
- On-site waste oil storage
- Corporate exposure to risk and liability as a result of the oil spill.

The three levels are defined as follows:

- A Tier 1 spill poses the least threat of impact, and can be managed using resources available at site.
- A Tier 2 spill response requires local shore-based management support and resources in addition to those already at site.
- A Tier 3 oil spill has the potential to affect Husky and shareholder company business operations. A Tier 3 response may require considerable corporate and contract resources, drawn from local, regional and international sources.

##### **16.10.2.1 Management Structure**

Because of the dynamic nature of offshore spills, the facility may quickly cease to be the scene of the slick. As a result, Tier 1 spills are generally managed offshore and Tier 2 and 3 spills are managed onshore by the Husky RRMT with assistance from Eastern Canada Response Corporation (ECRC).

### **16.10.2.2 Management Philosophy**

Five principles are considered paramount in all aspects of a spill response:

- The health and safety of all personnel must not be compromised
- Response to an emergency situation that threatens personnel safety or the integrity of the facility will take precedence over response to the oil spill
- Identifying and protecting sensitive environmental and human resources
- Response planning decisions should be based on net environmental benefit considerations to the maximum extent that is practical
- Operational response actions cover a wide range of effort and technology, depending upon the nature of the spill.

### **16.10.3 Response Strategy**

#### **16.10.3.1 Situation Assessment**

No action should be taken in response to a marine oil spill without an understanding of the nature of the problem. This appreciation will help managers to decide:

- What response actions are necessary
- How to implement the response in the safest and most effective manner.

The decision process requires ongoing collection and assessment of information from the spill site, including:

- Nature and type of spill
- Trajectory and weathering of oil
- Weather and sea state conditions
- Environmental sensitivity
- Logistics, equipment and personnel availability
- Effectiveness of the response to date.

#### **16.10.3.2 Net Environmental Benefit**

Each spill response option, or combination of options, can have some effect on the environment beyond that of the spill itself. The Husky response strategy is based on the principle of net environmental benefit. Net environmental benefit takes into consideration the advantages and disadvantages of specific response actions and their effect on the environment. Some response methods have the potential to cause adverse

environmental effects but may be justifiable because of overriding benefits and/or the avoidance of further, more serious, effects.

#### **16.10.4 Triage**

Triage is a way of setting priorities in an emergency to assist in the allocation of resources to achieve the greatest benefit. In a response, resources will be limited and actions will be severely affected by the time frame of the spreading oil. By recognizing these constraints, the triage process can focus decision making on:

- Allocation of resources for maximum benefit
- Monitoring issues that may require attention later
- Where not to use resources because of anticipated relative ineffectiveness.

When conducting a triage, Husky will consult with ECRC, C-NLOPB's Chief Conservation Officer and Environment Canada.

#### **16.10.5 Response Operations**

##### **16.10.5.1 Response Options**

In any spill response, Husky's objective will be to minimize the effects of the spill. At the time of a spill, it is of paramount importance that a response strategy be developed quickly. While every spill response will be unique, there are basic strategies that can be considered. Husky's oil spill response plan identifies the response options available during an offshore spill. These include the following:

- Surveillance and monitoring
- Mechanical dispersion
- Containment and recovery
- Wildlife measures.

##### **16.10.5.2 Capability**

Husky's spill response capability includes:

- A first response capability based on Husky equipment and vessels
- Mutual aid assistance through other Grand Banks operators
- ECRC Operational Spill Management Services – provided on contract to Husky
- ECRC personnel and equipment for larger spill response operations – provided on contract to Husky



- Resources available through Oil Spill Response Limited (OSRL), including access to the Global Response Network (GRN)
- CCG environmental response personnel and equipment.

#### **16.10.5.3 Initial Response Actions**

The initial actions to be taken in the event of a spill may be severely restricted or impossible if the platform is in an emergency situation. During an emergency, the spill will assume secondary importance to the emergency that caused the general platform alarm.

#### **16.10.5.4 Countermeasures**

Husky is in a position to use a considerable pool of spill response resources. With the combined resources of Husky, Hibernia and Suncor for dealing with Tier 1 spills, and the additional capabilities of ECRC for Tier 2 spills, the inventory of offshore spill response equipment resident in St. John's is the largest in Canada. Contract arrangements with ECRC allow Husky to access this equipment, along with trained personnel, in the event of a spill.

#### **16.10.6 Eastern Canada Response Corporation Role**

Husky has contracted ECRC to provide operational preparedness and response services. ECRC can also provide management support for a Tier 2 or 3 event.

ECRC is a full-time spill response organization certified by Transport Canada under the *Canada Shipping Act, 2001* (CSA). ECRC will take the lead in developing tactical and strategic plans and in coordinating spill response operations. Prior to implementation, all response activities and plans must be approved by Husky.

##### **16.10.6.1 Eastern Canada Response Corporation and the Incident Command System**

ECRC's Spill Management System is based on the principles of the Incident Command System and is compatible with the Husky response management process.

##### **16.10.6.2 Eastern Canada Response Corporation Oil Spill Response Centre**

During a spill response, both the Husky RRMT and the ECRC Oil Spill Response Centre will be mobilized. All spill response operations will be managed on shore from the dedicated ECRC Oil Spill Response Centre located in Donovan's Industrial Park. The Husky RRMT will serve as lead centre for all non-spill related components of the response, as well as for the provision of advice, information and approvals necessary for the spill response.

#### **16.10.7 *Canada Shipping Act, 2001***

If the source of the spill is a supply vessel or tanker (while not attached to the loading flange or when operating independent of the platform) or a shore-based facility, the vessel or facility operator will be the Responsible Party under the CSA. The CSA requires that these vessel or facility operators have response plans, designated and

trained spill response personnel, and contract arrangements with a Response Organization certified by Transport Canada. In every applicable case, ECRC is the Response Organization retained by Husky contractors. While CSA regulations do not apply to Husky drilling or production activities, Husky's spill capability meets CSA standards.

### 16.10.8 Waste Management

Waste management is an important component of any oil spill response operation. Procedures for handling waste must be in place before it is collected or stored. When initiating an oil spill response, a comprehensive waste management plan will be developed as soon as possible to ensure that the amount of waste generated is limited and the ultimate disposal of that waste is as efficient as possible. Husky maintains contractual arrangements with waste management service providers who will be called upon to assist in the development of the waste management plan for a specific spill, based on the countermeasures being used in the spill response and available local and national waste management options.

### 16.11 Tier 1 Operational Response Options

At the time of an oil spill, appropriate countermeasures, based on present conditions, must be implemented quickly. While every spill response will be unique, there are only a few basic techniques that can be practically considered. Oil spill response equipment that can be deployed quickly in the event of an oil spill has been positioned at site. The capability at site for any of these options is limited in response to small spills or the initial response to larger spills. Tier 1 countermeasures can be deployed rapidly with favorable weather conditions. Times will vary based on the equipment deployed from minutes for the tracker buoy to several hours for the Single Vessel Side Sweep (SVSS). Actual deployment time will vary based on the observed meteorological and oceanographic conditions.

**Table 16-2 Tier I Oil Spill Response Equipment Available at Site**

Equipment	Storage Location
8" Sorbent boom	<ul style="list-style-type: none"> <li>97.5 m (320 ft) of boom and 30.5 m (100 ft) of pom poms stored on all Husky supply vessels</li> </ul>
Offshore Single Vessel Side-Sweep system	<ul style="list-style-type: none"> <li>Outrigger arms stored on Husky supply vessels</li> <li>Booms and skimmers stored in containers on <i>SeaRose FPSO</i></li> </ul>
Oil and oiled bird sampling kit	<ul style="list-style-type: none"> <li>Sampling kits are stored on all Husky supply vessels</li> </ul>
Global Positioning Systems (GPS)/ Satellite oil spill tracker buoys	<ul style="list-style-type: none"> <li>MetOcean iSphere buoys are on all Husky supply vessels, the <i>SeaRose FPSO</i>, and the GSF Grand Banks</li> </ul>

### 16.11.1 Sorbent Boom

The side sweep sorbent boom system is a single-vessel oil recovery system used by all offshore support vessels chartered by Husky, in response to small oil spills at an offshore facility. Unlike a conventional boom, which acts as an impenetrable barrier that collects floating oil, the side sweep sorbent boom system is constructed of multiple 10-foot sections of 8" sorbent boom, which will absorb oil on contact.

The system uses the ship's crane as an outrigger arm, extending perpendicular to the side of the vessel, to tow the boom (Figure 16-2). One end of the boom is attached to the crane (winch cable hook is lowered to the water surface) and the other end is tied to the side of the vessel. As the vessel steams ahead at slow speed (1.8 to 3.7 km/h (1 to 2 knots)), a V-shaped boom is formed along the side of the vessel.

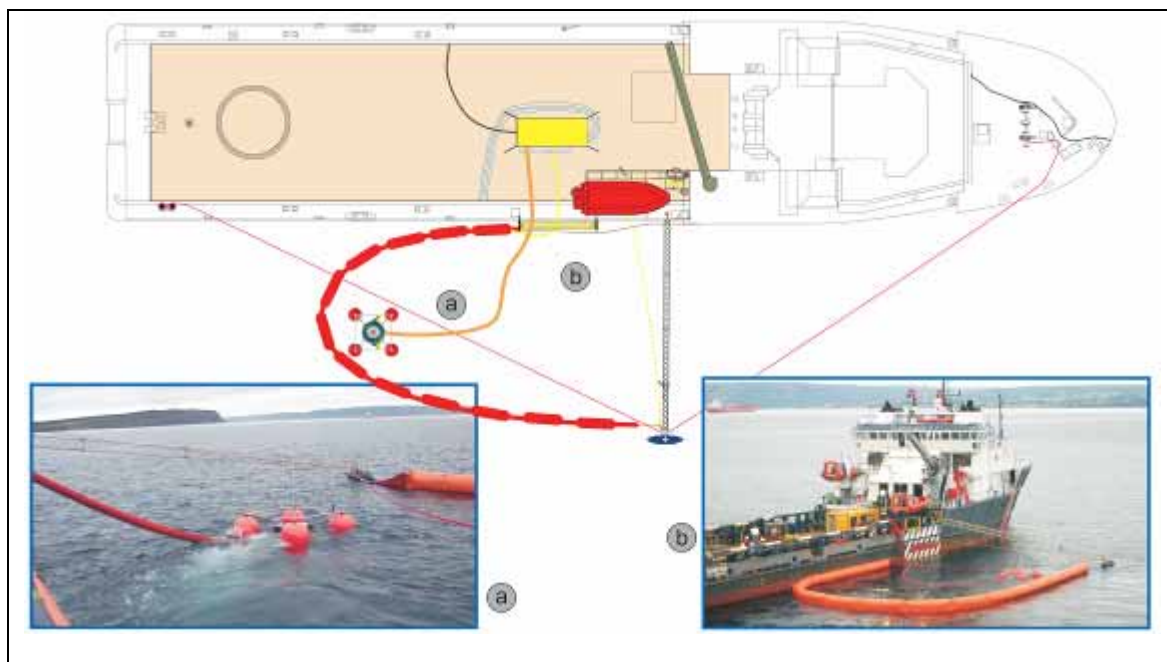


Figure 16-2 Sorbent Boom System

### 16.11.2 Single Vessel Side Sweep System

While in the White Rose field, the *SeaRose FPSO* has been equipped with the SVSS oil spill containment and recovery system. The philosophy of this system is to ensure that resources are available at site that can be deployed and operated in open ocean conditions by a single vessel. The system consists of a side-deployed outrigger arm and float, an inflatable containment boom and a skimmer for oil recovery (Figure 16-3).

The system was designed to be suitable for offshore conditions. The skimmer has been built on a broad flotation base and is very stable in a seaway. Its powerful thrusters ensure that the skimmer can be maneuvered into any part of the boom apex. The sea state rating for Husky's NOFI 800 SVSS boom is approximately 2 to 2.5 m significant wave height ( $H_s$ ), or Beaufort 5.



**Figure 16-3 Third Generation Single Vessel Side Sweep**

Each SVSS system consists of:

- Stored on the *SeaRose FPSO* - A customized 20 ft. DNV-class offshore container housing an inflatable oil containment boom, offshore oil skimmer, boom and hose deployment winches (reels), hydraulic control system, sweep arm rigging, hydraulic and discharge hoses and miscellaneous supplies.
- Stored on designated supply vessels - An outrigger arm assembly and boom deployment fairlead. The 20-m outrigger arm assembly keeps the oil containment boom positioned on the side of the vessel during oil recovery operations. The boom fairlead is designed to aid in the over-the-side deployment and recovery of the containment boom. Each vessel is equipped with dedicated SVSS hydraulics.

### 16.11.3 Oil and Wildlife Sampling Kits

Husky maintains oil and oiled wildlife sampling kits (Figure 16-4).



**Figure 16-4 Oil and Oiled Wildlife Sampling Kits**

The following features characterize Husky's oil and oiled wildlife sampling procedure:

- Offshore personnel are encouraged to sample any oil on water observed at any Husky site, regardless of source
- All Husky offshore platforms and vessels have been equipped with the sampling equipment described in this document
- Health, Safety, Environment and Quality advisors on Husky production or drilling rigs will coordinate sampling activity offshore
- The Husky Atlantic Region environmental coordinator, will manage samples on shore
- Someone will always be the custodian of the sample until analysis onshore is complete
- All sample handling actions will be documented (notifications, field notes, proper labelling and a chain of custody form)
- Samples will be kept cool at all times and shipped to St. John's as soon as possible.

#### **16.11.4 Satellite Tracker Buoys**

MetOcean satellite tracker buoys are available offshore on the vessels and platforms. An onboard Global Positioning Systems (GPS) receiver determines the buoy's position every 30 minutes. GPS positions are transmitted to shore via the Iridium satellite system. Buoy positions are processed and quality-controlled before being displayed on the JouBeh website ten minutes after transmission.

## 16.12 Tier 2 Equipment

There are three local sources of oil spill response equipment that might be considered for use when an offshore oil spill response escalates to the Tier 2 level:

- Producing operator-owned equipment - SVSS and Norwegian Standard System (Section 16.11.2)
- ECRC equipment stored in Donovan's
- CCG equipment stored in Donovan's.

Equipment in this pool is owned by offshore producing operators, ECRC and the CCG.

Deployment times for Tier 2 equipment will vary. Expected times are from 6 to 36 hours based on a number of conditions, such as:

- Meteorological and oceanographic conditions
- Recovery vessel locations
- Volume of crude spilled
- Amount of equipment to be mobilized and number of vessels to be outfitted.

### 16.12.1 Key Resources

The most suitable local resources available for an escalating offshore spill response include:

- Operators' SVSS systems
- Operator's Norwegian Standard System stored at ECRC, Donovan's
- ECRC NOFI 1000 boom stored at ECRC in Donovan's
- Various ECRC or CCG inflatable booms for sea states up to 1.5 m
- ECRC GT 260 skimmers with Desmi Helix brushes stored at ECRC, Donovan's
- CCG Transrec 200 stored at Donovan's
- CCG GT 260 skimmers stored at Donovan's.

### 16.12.2 Norwegian Standard System

In 2009, Suncor, Husky and HMDG shared in the purchase of a Tier 2/3 offshore oil spill containment system suitable for use in offshore Newfoundland conditions. The system consists of a Framo Transrec 150 weir skimmer and a 400 m Norlense 1200-R self-inflating boom. The system is identical to the NOFO Norwegian Standard System.

The Norwegian Standard System, with dedicated trailers and permanent deck mounts on designated response vessels, greatly improves oil collection capability because:

- Mobilization time is reduced to a few hours with deck mounts installed
- Increased safety as fewer personnel are required and boom self-inflates
- Oil recovery operations will be possible in greater sea states (3 to 3.5 m Hs)
- Skimmer efficiency is improved (oil capture, pumping rates and overall control).

The producing operators have entered into a preparedness agreement with ECRC that includes the continued system maintenance and training.

### **16.13 Tier 3 Equipment**

If an offshore oil spill response escalates to the Tier 3 Level, Husky will arrange to mobilize equipment from outside of Newfoundland and Labrador. Sources of this equipment will be:

- ECRC offshore-grade equipment stored in mainland depots
- Suitable offshore equipment owned by OSRL
- Equipment available through OSRL and ECRC membership in the GRN.

Tier 3 equipment would be expected to start arriving on site approximately 18 to 24 hours from initial activation.

#### **16.13.1 Eastern Canada Response Corporation Canadian Resources**

The most suitable Canadian resources available for an escalating offshore spill response are stored in ECRC depots in Dartmouth, Sept Isles, and Quebec City. The most suitable equipment in this pool includes:

- ECRC NOFI Ocean Buster boom (7.4 to 9.3 km/h (4 to 5 knots) towing) stored at ECRC, Quebec
- ECRC RoBoom and Oil Stop inflatable booms for sea states up to 1.5 m
- GT 185 and Desmi 250 Skimmers
- 50 m<sup>3</sup> tanker barges that could be used on deck for storage of recovered waste.

### **16.13.2 Global Response Network**

Several international oil spill cooperatives have formed an alliance, the GRN, to provide a Tier 3 mutual aid opportunity. The GRN also provides a framework between member organizations that allows all to improve benchmarking and knowledge-sharing. Members of the GRN include:

- OSRL
- Marine Spill Response Corporation
- Alaska Clean Seas
- Australian Marine Oil Spill Centre
- Clean Caribbean and Americas
- ECRC
- Western Canada Marine Response Corporation.

### **16.13.3 Dispersants**

Husky will apply to C-NLOPB for a permit to use dispersants should this application be considered to be an appropriate countermeasure. Dispersant application will commence as soon as operationally possible after the permit is approved. Husky has undertaken several tests to confirm that White Rose field crudes can be dispersed using Corexit 9500 and existing dispersant application technologies.

#### **16.13.3.1 Description of Dispersant**

It is likely that Tier 3 resources may be mobilized in the event of a major offshore oil spill response. As part of this effort, OSRL in Southampton, England, may be asked to provide airborne chemical dispersant capability. Airborne operations will only be considered in cases where a large volume of oil can be effectively treated. An operational plan will be required before dispersants are applied.

The OSRL airborne system consists of:

- Unmodified Hercules transport aircraft on long term charter to OSRL
- Nimbus modular dispersant spray system with loading system and spares
- Dispersant monitoring kit including in situ fluorometer.



The Nimbus system is used by OSRL as it can be transported in a conventional jet transport aircraft for installation in a pre-positioned aircraft. Response time is reduced as the deployment aircraft does not have to fly loaded when crossing the Atlantic. Nimbus system specifications include:

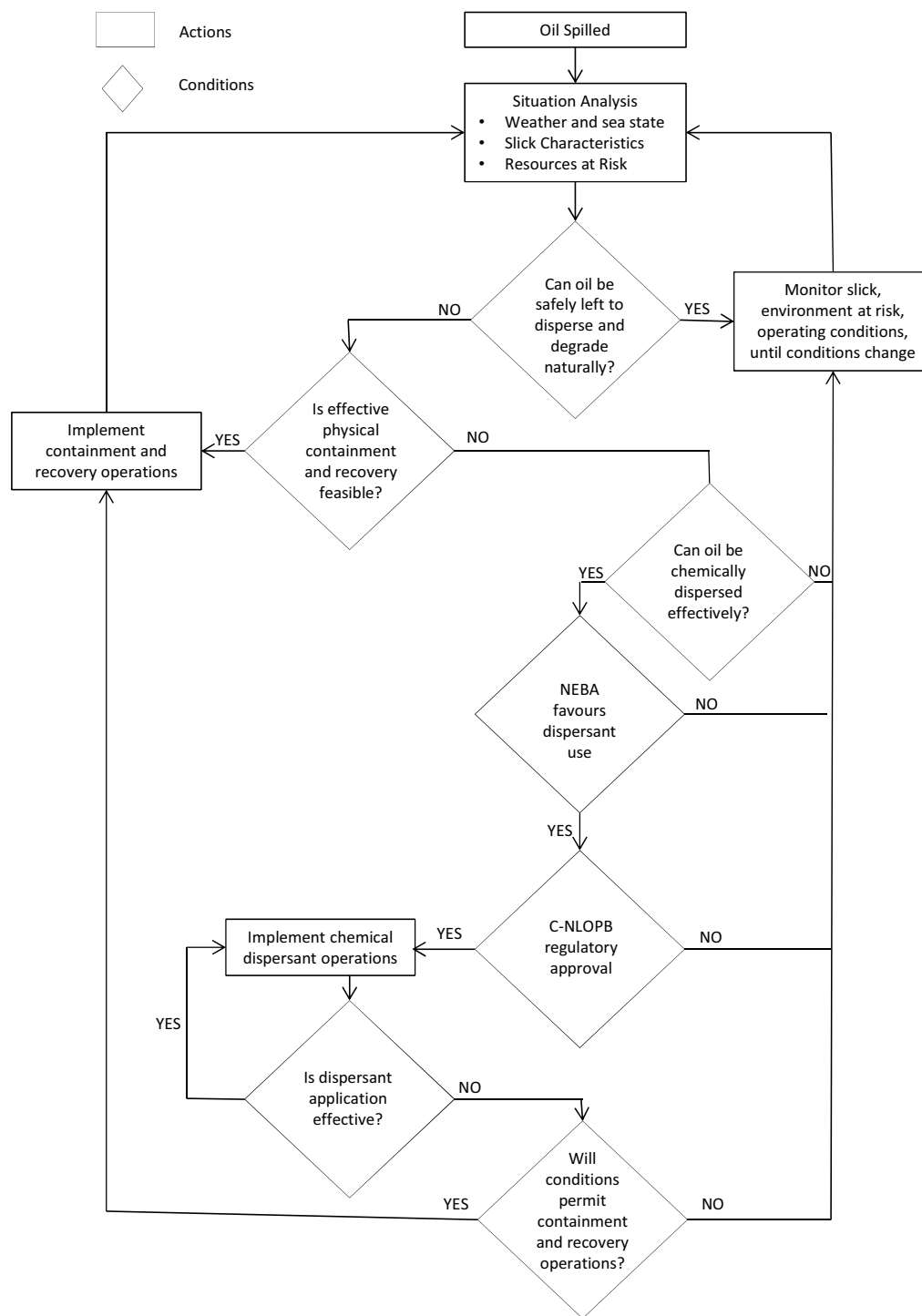
- Chemical carrying capacity - 12,000 L in a total of four tanks
- Swath width - 40 m
- Application rate - 80 L per hectare
- Treatment rate - 10 km<sup>2</sup> per hour
- Treatment per load – 1.5 km<sup>2</sup>.

#### **16.13.3.2 Decision Making**

The following should be considered when making a decision whether or not to use dispersants:

- Oil characteristics are suitable for safe and effective dispersion
- The thickness of the oil is sufficient to allow efficient application
- Sufficient water depth to allow complete mixing of oil and chemical
- Sensitive environmental or social resources are at risk of oiling
- Physical recovery methods or natural dispersion will not be adequate
- Weather or sea state conditions exceed safe working limits for physical recovery.

A generic decision-making process for dispersant use is illustrated in Figure 16-5.



**Figure 16-5 Generic Decision-making Process for Dispersant Use**

## **16.14 Offshore Training – Spill Response Operations**

Key offshore personnel receive practical instruction in oil spill operations. Emphasis is on response to small spills or the initial response to a larger spill.

Husky has entered into a preparedness agreement with ECRC that includes the provision of the following services;

- Management and maintenance of Tier 1 equipment (sorbents, tracker buoys, SVSS)
- Management and maintenance of Tier 2 equipment
- Initial and recurrent training for vessel crews
- Oil spill contingency planning and exercises.

### **16.14.1 Tier 1 Oil Spill Response Orientation**

Offshore personnel are given an overview of Tier 1 oil spill response operations. Topics covered include: the nature of offshore oil spills; notification procedures; a review of available oil spill response resources; and determining first response strategies.

### **16.14.2 Oil Spill Response Techniques**

All supply vessel crews, Health, Safety, Environment and Quality advisors and weather observers become familiar with on-water techniques applicable to their roles in a response.

Operational training includes sessions covering the following:

- Oil on water observations
- Use of the sorbent boom
- Oil sampling procedures
- Wildlife handling
- Basic seabird observation techniques.

On vessels that may be assigned to standby duties at the White Rose field, crews are trained in the use of the sorbent boom equipment and tracker buoy deployment. Designated vessels receive additional training on the deployment of the SSVS oil containment and recovery system.

### 16.15 Continuous Improvement

Husky is committed to continuous improvement in all areas of operations, including emergency response. New technologies and ideas are identified through participation in industry conferences and through relationships with service providers such as ECRC and OSRL. Examples of recent initiatives include:

- Procurement of a Norwegian Standard System in 2009 (in partnership with Suncor and HMDC)
- Conclusion of preparedness agreement with ECRC in 2010
- Ocean boom vane trials in 2010
- Procurement of second Norwegian Standard System (in Partnership with Suncor) in 2011
- Participation in industry initiatives to review dispersant effectiveness in the local operating area (2011-present).

### 16.16 Environment-related Training

Providing targeted assistance to employees and contractors is essential to ensuring that they understand how to work in a safe and environmentally responsible manner. To that end, both Husky and its contractors provide appropriately targeted orientation and training programs and materials to assist personnel with fulfilling their responsibility to work in a safe and environmentally responsible manner consistent with Husky's policies.

As appropriate, Husky and its contractors provide job-specific technical, health, safety and environment training and orientations. Husky's formal in-house training programs consider the level of training required for the position and responsibilities of the personnel involved. The aim of the training programs is to provide an understanding of the procedures, equipment, risks and potential hazards that may occur. Details respecting the competency and training process are outlined in the *SeaRose FPSO Training and Competency Program*. Husky audits pertinent training matrices against the Canadian Association of Petroleum Producers' Training and Qualifications Requirements to ensure that all personnel are suitably qualified and trained.

In addition to the above, Husky has developed an environmental awareness training course that is required to be completed by all personnel and an environmental responsibilities course that is required to be completed by management, supervisors, and personnel in environmentally-critical roles.

## 16.17 Ice Management

This section provides an overview of ice management practices used by offshore operators to provide a safe environment and minimize operational disruptions caused by ice. Currently, ice management is comprised of:

- Detection
- Monitoring and assessment
- Physical management.

Ice management was first conducted by the offshore oil industry in the early 1970s (Bruneau and Dempster 1971) and continued to develop through the following three decades. Initially, ice management was a reactive process, but as offshore oil operations expanded, ice management evolved into a proactive operation. Today, a coordinated approach is taken and decisions are made with respect to all operations being conducted on the Grand Banks. Physical management is conducted well upstream in an attempt to move any hazardous ice off the Grand Banks and out into the Flemish Pass, where faster moving currents will carry the ice safely past the production fields.

### 16.17.1 Detection

Sea ice and iceberg detection (in various forms) has been conducted for most of the twentieth century. These early detection efforts were primarily conducted to provide warnings to mariners about where ice would likely be encountered and a typical vessel's response was to avoid these areas. Offshore oil exploration is one of the few relatively stationary activities involving complex operations in ice-infested waters.

In the early days of exploration drilling off Canada's East Coast, most ice detection efforts were limited to detecting icebergs that drifted within radar range. With the increased use of moored semi-submersible drilling rigs in the early 1980s, the need to detect and accurately locate ice at greater distances became critical.

Detecting small floating targets in open seas is a well-understood and documented process. Technological advances in the past two decades have improved ice detection capabilities to a point where both sea ice and icebergs can be detected and their positions determined with great accuracy.

Typically, oil exploration and production operations off Canada's East Coast use a combination of radar technologies and procedures to quantify and monitor ice distribution. Between government (both Canadian and American) and private industry, there are over 5,000 hours of airborne reconnaissance conducted annually over the Grand Banks and areas to the north. In addition to these radar-equipped aircraft, the areas off Canada's East Coast are swept daily by an assortment of satellite-based sensors and long-range, shore-based radars. Data from all these sources are integrated into a daily summary of ice distribution. The sequential ice distribution data are then used to monitor growth and movement. Using these procedures, operators are able to detect and monitor ice conditions 300 km or more upstream of an operations area, allowing for long-term resource and operational ice management planning.

If ice moves south of 48°N, dedicated radar-equipped ice reconnaissance aircraft are used to monitor the advancing ice. These reconnaissance aircraft are capable of detection on even very small ice targets (Rudkin and Rippl 1988). In the unlikely event that any ice evades this detection network, most oil facilities are equipped with ice detection and monitoring radars that have been optimized for detection of small ice masses.

### **16.17.2 Monitoring and Assessment**

Once detected, ice must be monitored to establish the speed and direction of its movement (drift) and, when enough information has been obtained, assess its potential threat to a project. Typically, this is accomplished in stages. The initial detection is usually accompanied by a general classification of the type of ice or iceberg. As successive detections are made over an area, a general drift track is established. At this stage, the available data allow only for general assumptions to be made. However, these initial data are used primarily for ice management resource planning. As ice closes on a production area, more detailed information is required. The components of detailed ice assessment data are:

- Physical dimensions of sea ice and/or icebergs
- Depth measurements of icebergs (draft)
- Accurate drift (direction and speed).

The standard methodology for obtaining physical dimensions of icebergs is comprised of a mix of measurement, calculation and, in some cases, estimation, depending on the operational importance of the ice in question. Smaller icebergs and ice floes are usually estimated because their masses are well within the capabilities of ice management vessels. More detail about the overall mass and draft of larger icebergs is required. Methods of measuring the above-water dimensions of icebergs were pioneered almost three decades ago and remain little changed today. These methods are described in the Grand Banks operators' ice management plans and have been documented in many reports.

Once the above-water dimensions are known, calculations of overall mass can be made. These calculations are described in the operators' ice management plans. However, it should be noted that due to the irregular shapes of icebergs, these mass calculations only represent an estimation of true mass. They can be in error by  $\pm 20$  percent (Comfort and Edwards 1998). Several studies were conducted during the 1980s in an attempt to establish a relationship between above-water size (height and water-line length) and iceberg draft. At best, these attempts provided only a first order approximation. If the above-water-to-draft relationship shows the iceberg may be capable of running aground (scouring), then an operator must acquire more accurate data.

Obtaining accurate iceberg draft information is a long and sometimes complicated process and is accomplished by using underwater sonar deployed near the iceberg by an ice management vessel. This method has remained unchanged for nearly two decades. Although the sonar units have improved in accuracy and reliability, problems remain with deployment of the instrument and accurately maneuvering the vessel near the iceberg.

Obtaining accurate drift information is a simple process of measuring distance over time. The widespread use of GPS now provides very accurate positions and tracks, even over short distances and time periods.

Once these baseline data have been collected, a reasonable assessment of the risk posed by the ice/iceberg can be made. Typical risk assessment considers the following questions:

- Is the drift of the ice likely to pose a collision risk or disrupt operations?
- Is the draft of the iceberg sufficient to scour or strike components of a project?
- Is the ice in excess of the design criteria of a facility?
- Is the ice/iceberg within manageable parameters?

If the answer to these questions is 'no', then the ice need only be monitored for any drift changes. If the answer is 'yes', then either a physical ice management procedure will have to be attempted or the facility will have to be secured and prepared for a possible move.

One of the key assessments is establishing collision risk. This is achieved by assessing a combination of:

- The ice
- Local winds
- Local currents
- Forecasts and predictions of these components.

Several studies show that, when accurate wind and current data are available, observed iceberg trajectories can be predicted with physical-based models of iceberg drift. Results are relatively insensitive to model parameters such as air and water drag coefficients and, to some extent, iceberg dimensions and shape (Murphy and Anderson 1985; Smith 1993).

### **16.17.3 Physical Management**

In general terms, most physical iceberg management consists of towing or deflecting the iceberg off its free-drifting track. The first documented cases of iceberg towing were in 1971 (Bruneau et al. 1977). In simple terms, these first attempts consisted of deploying a long floating rope around the iceberg, then applying force with a towboat in the direction they wished to move the iceberg. These procedures and the equipment used are described in detail in Total Eastcan's iceberg towing manual (Eastcan Exploration Ltd. 1973). In the ensuing 30 years, other methods have been used with varying degrees of success, but this early method has remained the staple of iceberg management, having been used in nearly 500 documented iceberg tows.

The recent development of an iceberg tow net has gained popularity for management operation on the Grand Banks. The iceberg tow net was designed to reduce the amount of rope slippage and provide a reduction in iceberg rolling during towing.

The effectiveness of operational iceberg towing conducted during the 1980s has been studied (Bishop 1989). The conclusions were that, of 354 iceberg towing operations considered, 277 were successful with no difficulties, 74 were successful but required several attempts and 49 were unsuccessful. This translates into an effectiveness of 86 percent. Recently, much has been made of the criteria used in this study to define successful tows. However, since in most cases it is unknown what the free-drifting track would have been if the iceberg were not towed, tow success can only be evaluated on one simple criterion: did the offshore facility have to move? If not, the tow was successful.

Sea ice management procedures have been used much longer than iceberg management procedures and are well documented; breaking up sea ice to assist shipping is a commonplace occurrence in Canadian waters. Because of the loose nature of the pack ice in the area of the Grand Banks, sea ice management primarily consists of using support vessels to break up any large ice floes that meet or exceed the design limits of the offshore facility.

Over the 2008 and 2009 ice seasons, experience was gained using water cannons to open a path in the pack as it advanced towards offshore facilities. The method used a support vessel stationed a few hundred metres ahead of the offshore facility. By sweeping the vessel's water cannon left and right, a path or lead was opened up, keeping the loose pack clear of the offshore facility.

Beginning in late 1988, all operators on the Grand Banks adopted a coordinated ice management approach. Under this system, the joint operators share ice information and ice management resources, along with adopting a strategy and procedures for managing icebergs over the whole Jeanne d'Arc Basin.

While the current ice management procedures are generally effective, allowing for safe and, for the most part, efficient operations, there are a few areas where improvements would be beneficial. Both the offshore operators and the authors of a Program of Energy Research and Development (PERD)-sponsored report (King et al. 2009) on ice management have identified problematic areas as:

- Detection of small icebergs within pack ice
- Iceberg towing operations within pack ice
- Obtaining iceberg draft measurements reliably and efficiently
- Improved methods of attaching tow lines to icebergs
- Cost-effectiveness.



A joint industry, academic and private enterprise initiative has been started to address these and other issues related to ice management. In addition, several studies and reports, primarily under the auspices of PERD, have been conducted to address some of those issues, providing, among other things, cross-indexed databases of existing ice and iceberg data (PERD 2004).



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## 17.0 Summary and Conclusions

The original White Rose field underwent an environmental assessment in 2000 pursuant to CEAA as a Comprehensive Study (Husky Oil 2000, 2001). In 2007, a further environmental assessment was undertaken in regards to activities associated with construction of up to five additional subsea drill centres and associated flowlines under the *Husky White Rose Development Project: New Drill Centre Construction and Operations Program Environmental Assessment Addendum* (LGL 2007a). These previous environmental assessments encompass the location, construction and operation of the proposed subsea drill centres within the WREP. Therefore, much of the description of the WREP focuses on the WHP development option, which has not been previously assessed, although information is also provided on the subsea development option. The environmental effects analyses consider both development options. Regardless of the development option selected, the produced crude will be transported directly to the *SeaRose FPSO*. All production from the potential future drill centres will be processed through the *SeaRose FPSO* currently operating at White Rose. The effects of production have been previously assessed (Husky Oil 2000; LGL 2007a), and are not addressed in this document.

The C-NLOPB determined that the proposed WREP is not described in the *Comprehensive Study List Regulations* and therefore subject to a screening level of assessment under CEAA. The C-NLOPB and other federal Responsible Authorities set out the required scope of this environmental assessment in a Scoping Document (C-NLOPB 2012a), which was developed based on the requirements of CEAA for screening-level assessments. In July 2012, the WREP was placed on the designated projects list under CEAA 2012, the result being that the environmental assessment will continue as a screening level assessment. This environmental assessment meets these requirements, as well as the requirements of the *C-NLOPB Development Plan Guidelines* (C-NLOPB 2006).

In addition, the NLDEC considered the WREP an undertaking requiring an environmental preview report. This environmental assessment is to satisfy the requirements of both the EPA and CEAA. In that regard, a harmonized and coordinated review process will be implemented between the C-NLOPB and provincial requirements.

### 17.1 Summary of Proposed Activities

The WREP is considering two options to develop the West White Rose pool: a WHP or a sub-sea drill centre (existing field development method). The WREP also includes potential future construction and installation of up to two additional subsea drill centres elsewhere in the White Rose field.

The WHP consists of a CGS mated to a topsides structure. The CGS (less than 50 percent of the size of the Hibernia and Hebron gravity base structures as currently designed) will contain up to 48 well slots. The topsides structure will include drilling facilities, wellheads and support services such as accommodations for 120 to 130 persons, utilities and a helideck. The topsides will be constructed at an existing fabrication facility and is therefore not included in this environmental assessment.

The WHP development option proposes the construction of a CGS in Argentia, NL. The proposed CGS construction site is a brownfield location on the northeast portion of the Northside Peninsula, bordering Argentia Harbour. The CGS will be completely constructed in a dry graving dock. Excavation and dredging activities will be required near the graving dock construction site and at Corridor 1 and Corridor 2, to deepen the tow-out route for the CGS. Upon completion, the CGS will be floated to a deep-water mating site in Placentia Bay, where it will be mated with the topsides structure. The WHP will then be towed to and installed in the western portion of the White Rose field and tied back to the *SeaRose FPSO*.

The subsea development option includes a subsea drill centre and flowlines tied back to the *SeaRose FPSO*, similar to each of the other White Rose drill centres installed to date. The activities associated with the subsea option have previously been assessed under the *Husky White Rose Development Project: New Drill Centre Construction and Operations Program Environmental Assessment Addendum* (LGL 2007a). As part of that assessment, the construction of the subsea drill centre for the West White Rose pool, plus four other subsea drill centres were assessed for the White Rose field. The temporal scope of that assessment was from 2007 to 2015. Just two of those drill centres has been excavated to date, the North Amethyst and the SWRX drill centres. Associated with the environmental assessment of these drill centres was a fish habitat compensation program for all five of the drill centres. A fish habitat compensation agreement (Authorization No. 07-01-002) and monitoring program has been in place with DFO since 2007.

## **17.2 Summary of Assessment Findings**

### **17.2.1 Results of White Rose Extension Project Modelling**

The environmental effects analysis on fish and fish habitat, marine birds, marine mammals and sea turtles and species at risk considered the results of the noise, dredging, drill cuttings dispersion, SBM whole mud spill and oil spill modelling to determine the potential affected area for each VEC and to enhance the rigour of the environmental assessment. Oil spill trajectory modelling was also used in the environmental effects assessment on fisheries (which also included the results of the noise model) and sensitive areas.

Dredging can have a sound source level as high as 195.4 dB re  $\mu$ Pa at 1 m from the dredger (JASCO 2012). Results of acoustic modelling (JASCO 2012) for two different types of dredgers (a cutter suction dredge and a trailing suction hopper dredge) indicated that sound levels greater or equal to 180 dB re 1  $\mu$ Pa (rms) (un-weighted) occur at  $R_{95\%}$  distances of 7 m or less. Sound levels of 160 dB re 1  $\mu$ Pa (rms) or greater we found to occur within 5 m ( $R_{95\%}$ ) of the drilling activity (JASCO 2012).

Sediment suspension modelling showed that the thresholds for total particulate matter given in the *Canadian Water Quality Guidelines for the Protection of Aquatic Life* (CCME 2002) will not be exceeded. According to AMEC (2012a), maximum plume concentrations above 25 mg/L are expected to persist for no more than 4 hours for an average dredging operation in all wind scenarios. Concentrations above 10 mg/L would persist for approximately 6 hours, and levels above 5 mg/L would last for about 10 hours for a single dredging operation. Plume concentrations above 25 mg/L are expected to occur within limited areas of approximately 0.7 km<sup>2</sup>. The only significant difference

between the wind scenarios is observed in the extent and persistence of plume concentrations above 1 mg/L (but below 5 mg/L), where the southwesterly winds are about twice as efficient at dispersing these low levels of suspended sediment (within 21.9 hours) compared to the northwesterly winds (37.8 hours), and the most frequent, westerly wind conditions (32.6 hours).

The drift of WBM and cuttings under the WHP option is predicted to be within a range of 2 to 4 km for up to 40 wells, with a maximum extent of 5 km to the southeast and northeast. WBM and cuttings are expected to be less than 1 mm thickness over this area. Cuttings thicknesses directly under the WHP are modelled to be 1.8 m; however, from 200 to 500 m from the discharges source, thicknesses are predicted to average 1.8 mm (AMEC 2012b). In comparison to the WHP option, the subsea drilling centre (MODU) option would result in WBM cuttings thicknesses approximately one-third to one-quarter less than that of WHP drilling within 100 m from site, with little difference in cuttings thickness between the two options beyond 100 m (AMEC 2012b). The difference is due to fewer wells drilled (16 in comparison to 40 wells under the WHP option), as well as reduced volume of cuttings released (267 m<sup>3</sup> per well in comparison to 295 m<sup>3</sup>). If the WHP development option is selected, then SBM cuttings will be re-injected if a suitable disposal formation is available; this option is not technically feasible for MODU drilling. Within 100 m of the drill centre, initial SBM cuttings thicknesses are predicted to be 11.7 cm on average. Thicknesses are predicted to be 1.0 mm average 100 to 200 m out from the drill centre and 0.1 mm average from 200 to 500 m (AMEC 2012b).

Modelling to predict the footprint and potential effects of an SBM whole mud accidental release (AMEC 2012c) was based on the synthetic drilling fluid Puredrill IA-35LV (65 percent by volume), with a total density of 1,350 kg/m<sup>3</sup>. Four spill scenarios were modelled over varying fall velocities and release times as well as seasons. The maximum deposition footprint occurred in winter for the riser flex joint scenario, with the lowest fall velocity and longest release period (three hours). The majority of modelled spills had a footprint of 1,800 m<sup>2</sup> or smaller (e.g., 30 m by 60 m). The smallest footprints (30 m by 30 m) were modelled for the BOP disconnect scenario over a relatively short release time (one hour) and at a high fall velocity (AMEC 2012c).

Modelling of an unmitigated nearshore oil spill scenario found that a high proportion (55 to 94 percent) of the modelled slicks reach the shoreline due to the close proximity of the spill sites modelled to shore (near Argentia and the two possible deep-water mating sites) and due to the prevailing westerly and southwesterly winds in Placentia Bay. The minimum time to shore ranged from two to five hours if there was no spill response (SL Ross 2012). During the months of March and July, over 55 percent of the modelled spills (diesel slick) reached the shore within less than 24 hours, and more than 75 percent of the modelled spills reached the shoreline within 48 hours. Survival time of the diesel fuel that did not reach the shoreline ranged from a minimum of 0.5 days to 8 days (SL Ross 2012). The average summer and winter conditions were modelled based on wind speed and water temperature. There are few differences in the fate of the spills between the two seasons.

Models for both subsea and surface blowouts were produced by SL Ross (2012), based on oil flow rates of 6,435 m<sup>3</sup> per day and 3,963 m<sup>3</sup> per day during winter and summer scenarios. Based on modelling results, the oil spill trajectory for the Offshore Project Area covers an extensive area due to the quick dispersal and the amount of

hydrocarbons that could potentially be released in the event of such an accident. The winter zone of influence is smaller than in summer due to strong, persistent westerly winds in the winter, creating a tighter trajectory. The summer wind direction is more variable and the modelled slick moves over a wider area. Overall, a release of crude oil from the Offshore Project Area would persist and surface slicks would remain for several weeks. Of the 83,220 oil slicks modelled, Just 0.04 percent of slicks were predicted to reach the shore.

### **17.2.2 Air Quality**

To assess potential effects on air quality in the nearshore and offshore environments, an emissions inventory was used to predict the annual emissions released and modelling (Stantec 2012c) estimated the maximum ground-level concentrations. The change in air quality attributable to the construction, operation and decommissioning of the WREP (both development options) is expected to be low in magnitude, local in extent, short-term in duration (during construction, but continue for the life of the WREP during operation) and reversible. Components associated with all phases of the WREP for both development options, including power generation, MODU operation, flaring and fugitive releases, as well as accidental releases and cumulative environmental effects, will result in emissions that will not exceed applicable maximum ground-level concentrations.

Construction and operation of the WREP (both development options) will result in GHG emissions. The magnitude of these emissions is ranked low (subsea drill centre option) to medium (WHP option) for both the construction (which applies only to the WHP option) and operation phases (which applies to both options) of the WREP. The WHP development option would require the preparation of a GHG management plan. By implementing appropriate mitigation measures, the environmental effects on Air Quality during the construction, installation and operation and maintenance phases of the WREP, including accidental events and cumulative environmental effects, are predicted to be not significant.

### **17.2.3 Fish and Fish Habitat**

To assess the effects on Fish and Fish Habitat, models were used to determine the extent of the potential effects of noise, dredging and drill cuttings dispersion (see Section 17.2.1). Environmental effects of routine WREP activities from construction, installation, operation and maintenance, decommissioning and abandonment and potential future activities are generally low in magnitude, of limited geographic extent and reversible. Based on planned mitigation and the nature of the environmental effects, the environmental effects of routine WREP activities on Fish and Fish Habitat during the construction, installation and operation and maintenance phases of the WREP (including cumulative environmental effects) are predicted to be not significant.

An accidental event in the nearshore is not expected to cause a significant adverse effect on Fish and Fish Habitat, defined as a decrease in abundance or alteration in distribution of the population over more than one generation. Likewise an accidental event in the offshore is predicted to be reversible and is not expected to cause a significant adverse effect on Fish and Fish Habitat.

The potential residual adverse environmental effects of the WREP (including accidental events) on Fish and Fish Habitat are not considered of sufficient geographic extent,



magnitude, duration, frequency and/or irreversibility to result in a decline in abundance or change in distribution of a population(s) over more than one generation within the Nearshore and/or Offshore Study Areas.

#### **17.2.4 Fisheries**

The required safety zones during nearshore dredging and topsides mating will create a temporary loss of access to fishing grounds and potential interference with vessel transit. As the majority of material delivered to the CGS construction site will be by land, marine traffic associated with the WREP will be minimal. Any marine traffic associated with the CGS construction will use designated routes. Dredging will be planned to void fish harvesting times, where possible. Husky will also work with active fish harvesters potentially affected by the CGS tow-out from the graving dock to the deep-water mating site and from the deep-water mating site to the White Rose field to ensure safety and minimize disturbance.

The established White Rose Safety Zone offshore has restricted fish harvesting since 2005 to avoid potential interactions between fishing gear and subsea equipment. Considering the relatively low level of fish harvesting within the Offshore Project Area in recent decades, few gear conflicts or effects are likely to occur from the WREP. The greatest potential for interaction is along the route from ports servicing the WREP to the Offshore Project Area. However, the vessels associated with the WREP will use existing routes established by current White Rose field operations.

Economic effects from accidental events resulting in loss of access, gear damage or product marketability could be considered significant to the fisheries. However, the application of appropriate mitigative measures (e.g., economic compensation) would reduce the potential effect to not significant. Likewise, the existing Gear and Vessel Damage Compensation Program would apply to damage resulting from activities associated with the WREP.

With the proposed mitigation measures in place, the environmental effects on Fisheries during the construction, installation and operation and maintenance phases of the WREP, including accidental events and cumulative environmental effects, are predicted to be not significant.

#### **17.2.5 Marine Birds**

Adverse environmental effects of attraction of birds to lights on structures and vessels during the construction/installation, operation and maintenance, and decommissioning and abandonment phases of the WREP are predicted to be low in magnitude, geographic extent, duration and frequency when mitigation measures are practiced (e.g., use only lights as necessary for safe operations). Although light-related effects could result in bird mortality, these environmental effects are predicted to be not significant at the population level.

Adverse environmental effects of accidental events (i.e., hydrocarbon and other chemical spills due to collisions, subsea blowouts, batch spills, marine vessel incidents, graving dock breach, synthetic-based mud (SBM) whole mud spills) are predicted to be low to high in magnitude, low to high in geographic extent, low to moderate in duration and low in frequency.

The environmental effects on Marine Birds during the construction, installation and operation and maintenance phases of the WREP, including cumulative environmental effects, are predicted to be not significant. While the environmental effects on Marine Birds from a large, persistent accidental event could be significant, such a significant effect is considered not likely.

#### **17.2.6 Marine Mammals and Sea Turtles**

Adverse environmental effects of underwater noise on marine mammals and sea turtles during the construction/installation, operation and maintenance and decommissioning and abandonment phases of the WREP are predicted to be mostly localized, of low to medium magnitude, and reversible at the population level when mitigation measures are practiced in both the Nearshore and Offshore Study Areas.

For WREP activities such as wellsite surveys, Husky will implement a marine mammal and sea turtle observation program consistent with the requirements outlined in the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines*. Data on marine mammal and sea turtle observations will be provided to DFO and the C-NLOPB where applicable.

Depending on the time of year, location of animals within the affected area and type of oil spill or blow-out, the effects of a nearshore or offshore oil release on the health of cetaceans is predicted to range from negligible to low magnitude over varying geographic extents.

The environmental effects on Marine Mammals and Sea Turtles during the construction, installation and operation and maintenance phases of the WREP, including accidental events and cumulative environmental effects, are predicted to be not significant.

#### **17.2.7 Species at Risk**

Many of the potential environmental effects of the WREP on species at risk, and associated mitigation measures, are the same as those for non-listed species. On an ecosystem basis, the at-risk and not at-risk species and their habitats are often highly integrated.

With the application of appropriate mitigation, the potential residual adverse environmental effects of the WREP on marine fish species at risk from routine WREP activities are not considered of sufficient geographic extent, magnitude, duration, frequency and/or irreversibility to result in the killing or harming of a fish species that is listed as extirpated, endangered or threatened, and therefore the effects are considered not significant in the Nearshore and/or Offshore Study Area. The residual adverse environmental effects of an accidental hydrocarbon spill on marine fish SAR populations are predicted to be not significant.

The *Statement of Canadian Practice on Mitigation of Seismic Noise in the Marine Environment*, appended to the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012d) will be followed to minimize environmental effects on at-risk marine mammals and sea turtles. WREP activities are mostly localized, of low to medium magnitude, and reversible at the population level. The environmental effects on marine mammal and sea turtles Species at Risk during the

construction, installation and operation and maintenance phases of the WREP, including accidental events and cumulative environmental effects, is predicted to be not significant. A hydrocarbon spill associated with the WREP will not result in any significant residual environmental effects to at-risk marine mammals or sea turtles in the Nearshore or Offshore Study Areas.

Given that WREP activities are mostly localized, of negligible to low magnitude, and reversible, there are not likely to be significant adverse environmental effects on marine bird Species at Risk from routine WREP in the Nearshore or Offshore Study Areas.

Adverse environmental effects of accidental events (i.e., hydrocarbon and other chemical spills due to collisions, failure of lines, subsea blowouts, batch spills, marine vessel incidents, graving dock breach, SBM whole mud spills) are predicted to be low to high in magnitude, low to high in geographic extent, low to moderate in duration and low in frequency. Although hydrocarbon spills have the potential of being significant at the individual level, these environmental effects are predicted to be reversible at the population level. Nevertheless, the environmental effects of hydrocarbon spills have the potential of being significant. Smaller scale spills and blowouts in calm conditions may be mitigated via oil spill response measures and marine bird rehabilitation; however, these mitigations are recognized to be limited. Husky will adhere to safety and risk management systems, management of change procedures, and global standards. There will be an emphasis on accident prevention at all phases of the WREP.

#### **17.2.8 Sensitive Areas**

Sensitive areas of habitat within the Nearshore Study Area include the Placentia Bay Extension Ecologically and Biologically Significant Area (EBSA), eelgrass beds, capelin beaches, coastal wetlands, Important Bird Areas and otter haul-outs. Of these, eelgrass beds are most vulnerable to project activities. Outside the areas to be dredged, a change in habitat quality due to sedimentation is not expected to have considerable adverse environmental effects since eelgrass is resilient to sedimentation in the water column. As there are multiple eelgrass beds in the Nearshore Study Area, the removal of one small eelgrass beds from near the graving dock is considered to be not significant.

In a worst-case scenario, all sensitive areas within the Nearshore Study Area could be affected by an accidental spill. Although the likelihood of an oil spill in the Nearshore Study Area from an accidental event or collision is low, spill prevention procedures and contingency planning will be developed to prepare for an accidental event. In the unlikely event of a diesel spill in the Nearshore Study Area, these procedures and plans will be implemented to reduce the severity and duration of interactions between hydrocarbons and Sensitive Areas. Significant residual adverse environmental effects on these Sensitive Areas are therefore not considered likely.

Sensitive Areas in the Offshore Study Area include EBSAs identified by DFO where there is high productivity and/or aggregations of species, as well as sensitive areas identified by NAFO including Vulnerable Marine Ecosystems, coral-sponge areas and the Bonavista cod box. Oil spill trajectory modelling indicates that hydrocarbons from a spill at the Offshore Project Area have the potential to interact with Sensitive Areas, in the absence of countermeasures. Spill prevention and contingency plans will be in place to reduce the likelihood of an accidental event occurring, and the likelihood of

hydrocarbons reaching a Sensitive Area. SBM modelling suggests that SBM is unlikely to reach any Sensitive Areas.

The environmental effects on Sensitive Areas from activities associated with the WREP, including accidental events and cumulative environmental effects, are predicted to be not significant.

### 17.3 Summary of Proposed Mitigation Measures

The proposed mitigation measures for each of the VECs are outlined in Table 17-1 for each phase of the WREP and accidental events.

Husky has an Environmental Protection and Compliance Monitoring Plan (see Section 16.2) for its existing activities in the White Rose field, which will be reviewed and revised as necessary to include the WREP. Husky's existing contingency plans will be revised to incorporate activities associated with the WREP prior to the onset of any WREP activities. Husky is strongly committed to protecting its employees, contractors, general public, assets and the environment in which we operate. This commitment is clearly communicated in its Health, Safety and Environment Policy. Husky has developed the HOIMS as a systematic approach towards operational excellence. Husky ensures compliance with HOIMS and regulatory requirements through the implementation of effective management systems and processes, as well as through the allocation of adequate resources. The Atlantic Region's management system includes plans for ice management, waste management, oil spill response and contingency plans for emergency events.

Husky will continue to comply with all regulatory requirements respecting environmental protection during offshore drilling and production operations, in accordance with the *Drilling and Production Guidelines* (C-NLOPB and CNSOPB 2011), OWTG (NEB et al. 2010), *Offshore Chemical Selection Guidelines for Drilling and Production Activities on Frontier Lands* (NEB et al. 2009), *Environmental Protection Plan Guidelines* (NEB et al. 2011), *Offshore Physical Environmental Guidelines* (NEB et al. 2008) and the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012d).

**Table 17-1 Proposed Mitigation by Phase and Valued Environmental Component**

Applicable VEC	Mitigation
<b>Nearshore Pre-construction and Construction</b>	
Air Quality	<ul style="list-style-type: none"> <li>• Dust suppression</li> <li>• Proper maintenance and efficient operation of machinery</li> <li>• Dust collection system for concrete batch plant</li> <li>• Equipment maintenance and inspections</li> <li>• Adhere to NL <i>Air Pollution Control Regulations, 2004</i> and CEPA National Ambient Air Quality Objectives</li> </ul>

Applicable VEC	Mitigation
Fish and Fish Habitat Marine Birds Marine Mammals and Sea Turtles Species at Risk (Marine Fish, Marine Mammals and Sea Turtles and Marine Birds) Sensitive Areas	<ul style="list-style-type: none"> <li>• Equipment design</li> <li>• Compliance with <i>Fisheries Act</i> Authorization</li> <li>• Use of industry best practices</li> <li>• Compliance monitoring and treatment as required before discharge</li> <li>• Settling pond</li> <li>• Adherence to DFO's <i>Freshwater Intake End-of-Pipe Fish Screen Guideline</i></li> <li>• Safety zone</li> <li>• Adhere to CWS recovery and release protocol for stranded bird</li> <li>• Evaluate use of shielding and deflectors with directional lighting and incorporate where safe</li> <li>• Maintain steady course and safe speed when possible</li> <li>• Avoid/deviate course for marine mammal and sea turtle and marine bird concentrations when possible</li> <li>• Minimum altitude of 300 m and lateral distance of 2 km over active colonies, including Cape St. Mary's Ecological Reserve and elsewhere when possible</li> </ul>
Fisheries	<ul style="list-style-type: none"> <li>• Fisheries Liaison Committee (FLC)</li> <li>• Fisheries Liaison Officer (FLO)</li> <li>• Single point of contact (SPOC)</li> <li>• Communication/notifications</li> <li>• Gear damage compensation</li> <li>• Loss of access compensation</li> <li>• Use of agreed routes/Vessel Traffic Separation Scheme</li> </ul>
<b>Nearshore Accidental Events</b>	
Air Quality	<ul style="list-style-type: none"> <li>• Spill prevention plan</li> <li>• Spill response training, preparation, equipment inventory and emergency response drills</li> <li>• Routine inspections of equipment</li> <li>• Vessels will not be re-fueled in the Nearshore Project Area</li> <li>• Oil Spill Response Plan</li> <li>• Adhere to MARPOL</li> </ul>
Fish and Fish Habitat Marine Birds Marine Mammals and Sea Turtles Species at Risk (Marine Fish, Marine Mammals and Sea Turtles and Marine Birds) Sensitive Areas	<ul style="list-style-type: none"> <li>• Training, preparation, equipment inventory, prevention, and emergency response drills</li> <li>• Spill Prevention Plan</li> <li>• Oil Spill Response Plan</li> <li>• Vessels will not be re-fueled in the Nearshore Project Area</li> <li>• Adhere to MARPOL</li> <li>• Design of graving dock</li> <li>• Prevention through design standards and maintenance</li> <li>• Emergency Response Contingency Plan</li> </ul>
Fisheries	<ul style="list-style-type: none"> <li>• Clean-up</li> <li>• Compensation</li> </ul>
<b>Offshore Installation, Operation and Maintenance, Decommissioning and Abandonment, Potential Future Activities</b>	
Air Quality	<ul style="list-style-type: none"> <li>• Efficient technology</li> <li>• Use of natural gas as primary fuel</li> <li>• Properly maintained and efficient operation</li> <li>• Maintenance and inspections</li> <li>• Monitor the number of flaring events</li> <li>• Investigate the use of efficient/reduced emission and incorporate into design where technically and economically feasible</li> </ul>

Applicable VEC	Mitigation
Fish and Fish Habitat Marine Birds Marine Mammals and Sea Turtles Species at Risk (Marine Fish, Marine Mammals and Sea Turtles and Marine Birds)	<ul style="list-style-type: none"> <li>• Planning</li> <li>• Equipment design</li> <li>• Use only lights as necessary for safe operations</li> <li>• Compliance with <i>Fisheries Act Authorization</i></li> <li>• Adhere to <i>Canada Shipping Act, 2001</i></li> <li>• Minimize seabed disturbance</li> <li>• Adhere to OWTG</li> <li>• Solid waste disposed of properly onshore</li> <li>• Adherence to <i>Statement of Canadian Practice on Mitigation of Seismic Noise in the Marine Environment</i> in the <i>Geophysical, Geological, Environmental and Geotechnical Program Guidelines</i></li> <li>• Reinjection of SBM cuttings if WHP is used</li> <li>• Use of <i>Offshore Chemical Selection Guidelines</i></li> <li>• Avoid/deviate course for marine bird and marine mammal concentrations when possible</li> <li>• Maintain steady course and safe speed when possible</li> <li>• Minimum altitude of 300 m and lateral distance of 2 km over active colonies, including Cape St. Mary's Ecological Reserve and elsewhere when possible</li> <li>• Adhere to CWS recovery and release protocol for stranded bird</li> <li>• Evaluate use of shielding and deflectors with directional lighting and incorporate where safe</li> <li>• Use of best practices and improvement programs</li> <li>• Subsurface waste discharge</li> <li>• Re-use of drill mud</li> </ul>
Fisheries	<ul style="list-style-type: none"> <li>• Route analysis/selection</li> <li>• FLO</li> <li>• SPOC</li> <li>• Communication/notification</li> <li>• Gear damage compensation</li> </ul>
<b>Accidental Events</b>	
Air Quality	<ul style="list-style-type: none"> <li>• Train personnel in spill prevention and awareness</li> <li>• Spill Response Plan</li> <li>• Drilling design and geotechnical surveys</li> <li>• Alert/Emergency Response Contingency Plan</li> <li>• SOPs for oil handling operations</li> <li>• Routine maintenance, including leak detection and repair</li> <li>• SOPs for chemical handling and storage</li> <li>• Risk awareness, emergency response and preventative measures, training on fuel handling and storage</li> </ul>
Fish and Fish Habitat Marine Birds Marine Mammals and Sea Turtles Species at Risk (Marine Fish, Marine Mammals and Sea Turtles and Marine Birds) Sensitive Areas	<ul style="list-style-type: none"> <li>• Spill Prevention Plan</li> <li>• Oil Spill Response Plan</li> <li>• Use of best practices and continual improvement programs</li> <li>• Training, preparation, equipment inventory, prevention, and emergency response drills</li> <li>• Preparation for contingency planning and clean up</li> </ul>
Fisheries	<ul style="list-style-type: none"> <li>• Clean-up</li> <li>• Compensation</li> </ul>

## 17.4 Summary of Monitoring and Follow-up

A comprehensive environmental protection plan (EPP) for onshore and nearshore activities will be submitted to the Province of Newfoundland and Labrador for review in Q1 2013. The EPP will outline Husky's approach to monitoring the potential environmental effects of graving dock and CGS construction and ensuring the regulatory compliance of all associated activities.

Husky's existing EEM monitors the effects of its offshore activities in the White Rose field. The existing EEM design will be revised to incorporate the West White Rose pool development option and potential future development options as required.

As per requirements under its fish habitat compensation approval (Authorization No. 07-01-002 - for up to five subsea drill centres), Husky will continue to conduct the fish habitat compensation monitoring program in North Harbour. The requirements for further fish habitat compensation and monitoring will be discussed with DFO in light of changes to the *Fisheries Act*.

For wellsite and VSP activities in the Offshore Study Area, Husky will implement a marine mammal and sea turtle observation program. The program will be consistent with the requirements outlined in the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012d). Data on marine mammal and sea turtle observations will be provided to DFO and the C-NLOPB where applicable.

In the event of a spill, and depending on the nature and size of the spill, marine bird monitoring will be implemented. The details regarding monitoring requirements and protocols are outlined in the oil spill response plan and will be determined in consultation with the C-NLOPB and Environment Canada.

Husky conducts an environmental monitoring program to record weather and ice conditions in the White Rose field. This program will be expanded to include environmental monitoring at the WREP offshore location.

Husky will provide quarterly reports to the Province during the construction phase, including information on the number of people employed by four-digit NOC code, the number of apprentices and journeypersons, gender and residency of the workforce. During the operations phase, Husky will continue to report to the C-NLOPB quarterly on Canada-Newfoundland and Labrador Benefits associated with the WREP, including headcount by occupation type, residency and gender for Husky and its major contractors. Husky will also report annually to the C-NLOPB on the percentage of its workforce and that of its contractors that are comprised of the four designated groups: women; Aboriginal persons; persons with disabilities; and visible minorities.

Husky will submit to the Minister responsible for the Status of Women and the Minister of Natural Resources, a WREP-specific diversity plan for the construction phase of the WREP. This plan will include strategies for women's employment and business access. Husky has in place an approved Diversity Plan with the C-NLOPB, which will continue to govern operation of the WREP.

## 17.5 Conclusions

A summary of the residual environmental effects assessment for each of the identified VECs is provided in Table 17-2. The residual adverse environmental effects from planned routine activities associated with the WREP are predicted to be not significant. Most environmental effects are predicted to be reversible, of limited duration, magnitude and geographic extent. The only potential for significant residual adverse environmental effects as a result of the WREP is associated with a large-scale accidental event. Should an accidental event occur, significant adverse environmental effects have been predicted for Marine Birds and marine bird Species at Risk; however, the likelihood of an accidental event of this magnitude occurring is considered very low. Husky will design the WREP and conduct all activities with a focus on safety and pollution prevention. Should the WHP option be selected, a site-specific EPP will be developed in consultation with regulatory authorities to help prevent and mitigate any accidental events.

**Table 17-2 Significant and Not Significant Residual Adverse Environmental Effects on Valued Environmental Components**

VEC	Significance of Residual Environmental Effect					
	Construction and installation	Operation and Maintenance	Decommissioning and Abandonment	Accidental Events	Project Overall	Cumulative Environmental Effects
Air Quality	NS	NS	NS	NS	NS	NS
Marine Fish and Fish Habitat	NS	NS	NS	NS	NS	NS
Fisheries	NS	NS	NS	NS	NS	NS
Marine Birds	NS	NS	NS	S	NS	NS
Marine Mammals and Sea Turtles	NS	NS	NS	NS	NS	NS
Marine Fish Species at Risk	NS	NS	NS	NS	NS	NS
Marine Mammal and Sea Turtle Species at Risk	NS	NS	NS	NS	NS	NS
Bird Species at Risk	NS	NS	NS	S	NS	NS
Special Areas	NS	NS	NS	NS	NS	NS
S = Significant residual environmental effect NS = Not significant residual environmental effect						



Since the temporal scope for the offshore component of the WREP is over two decades, Husky recognizes that the regulatory and biophysical environment may change during that timeframe from that assessed in this report. The renewal of any applicable authorizations and/or any important changes in environment or resource use in the Offshore Project Area requires a current and valid environmental assessment. As authorizations are renewed or new ones are required over the life of the WREP, Husky will submit the necessary documentation to the C-NLOPB and federal regulatory authorities to confirm that proposed activities are captured within the scope of the WREP and that environmental assessment predictions remain valid, including those for Species at Risk.

Husky has and will continue to follow a performance assessment and continuous improvement approach with respect to environmental management of the WREP (1 of the 14 fundamental elements of the HOIMS). Husky ensures compliance with HOIMS and regulatory requirements through the implementation of effective management systems and processes, as well as through the allocation of adequate resources.



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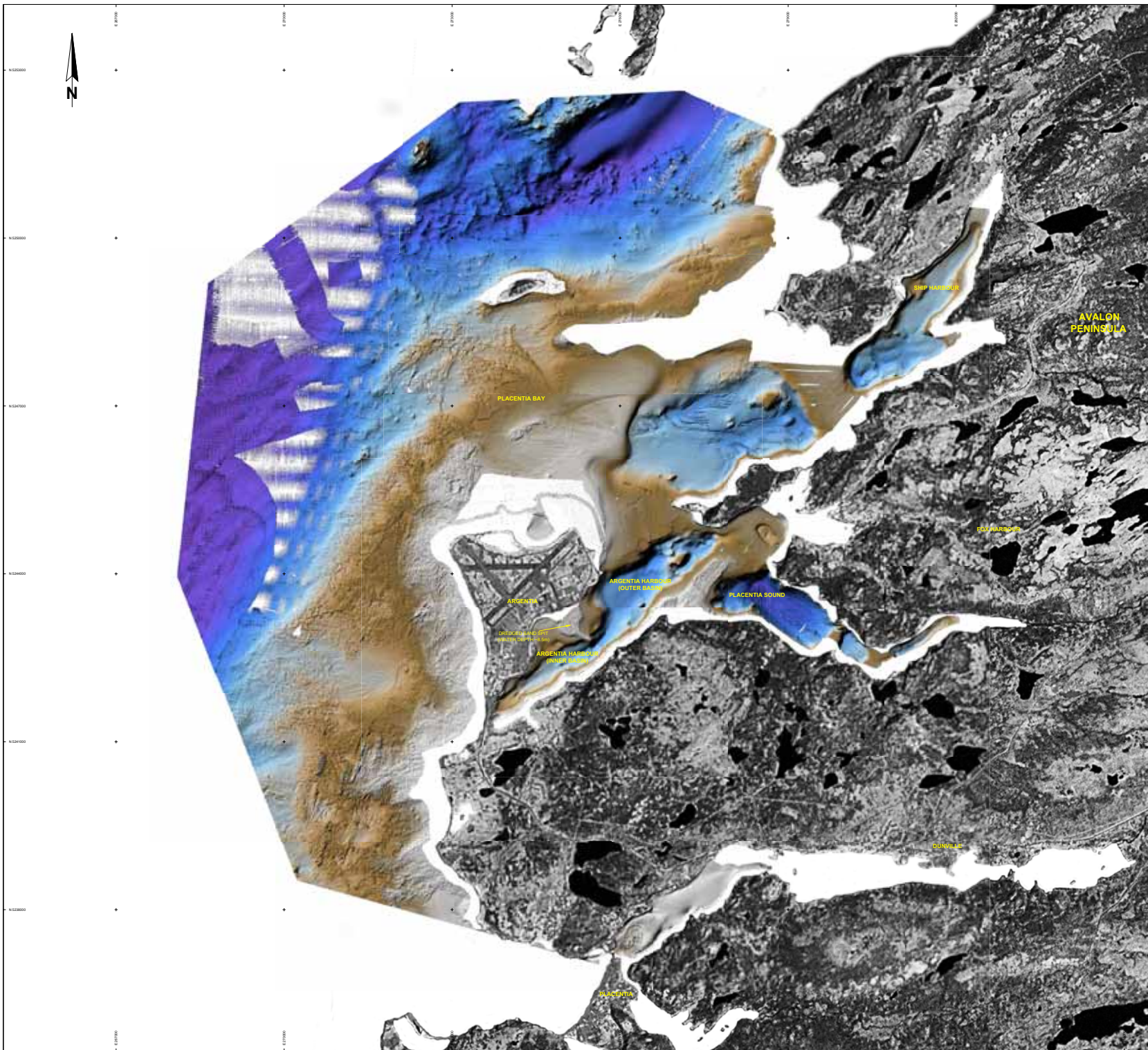
## **Appendix A**

### **List of Fishers Consulted during the Environmental Assessment**



Group	Participant
Fishers Attending Consultation Meetings, Arnold's Cove, Placentia and Petit Forte, June 14 and 15, 2012	Jerome Barry, Independent Fisher, Petite Forte Tony Barry, Independent Fisher, Placentia Shawn Boutcher, Independent Fisher, Little Harbour Wilbert Crann, Independent Fisher, Fairhaven Joseph Culleton, Independent Fisher, Fox Harbour Merv Hollett, Independent Fisher, Arnold's Cove Earl Johnson, Independent Fisher, North Harbour Ambrose Jones, Independent Fisher, Petite Forte Francis King, Independent Fisher, Fox Harbour Ken King, Independent Fisher, Fox Harbour Colm Leonard, Independent Fisher, Petite Forte Terry Leonard, Independent Fisher, Petite Forte Paul Mulroney, Independent Fisher, Arnold's Cove Chris Pearson, Independent Fisher, Petite Forte Cecil Penney, Independent Fisher, Arnold's Cove Leonard Picco, Independent Fisher, Arnold's Cove Charlie Pittman, Independent Fisher, Fox Harbour Mike Pittman, Independent Fisher, Fox Harbour Robert Pittman, Independent Fisher, Fox Harbour Donald Pomeroy, Independent Fisher, Dunville Gerald (Carter) Pomeroy, Independent Fisher, Placentia Frankie Spurvey, Independent Fisher, Placentia Kerry Ward, Independent Fisher, South East Bight Loretta Ward, Independent Fisher, South East Bight
Other Fishers (Telephone Interviews)	William Collins, Independent Fisher, Davis Cove Ross Dunphy, Independent Fisher, Monkstown Freeman Tobin, Independent Fisher, Davis Cove
Agency Managers	Todd Budgell, Manager of Aquaculture Licencing and Inspections, Dept. of Fisheries and Aquaculture, Grand Falls Mike Hurley, Fisheries Officer, DFO, Placentia Office Ann-Margret White, Regional Director, Maritime Services, Canadian Coast Guard, St. John's Captain Clem Murphy, Ship's Safety Branch, Transport Canada Stan Gutt, Ship's Safety Branch, Transport Canada Gladys Tucker, Licensing Branch, DFO, NL Region, St. John's
FFAW/One Ocean	John Boland, Staff Representative, FFAW, St. John's Roland Hedderson, Staff Representative, FFAW, Clarendville Robyn Saunders-Lee, Petroleum Liaison Coordinator, FFAW, St. John's Maureen Murphy-Rustad, Director of Operations, One Ocean, St. John's

Group	Participant
Fishers/FFAW/One Ocean Attending Consultation Meeting September 20, 2012	Gerard Chidley, Independent Fisher Nelson Bussey, Independent Fisher Robbie Green, Independent Fisher Glen Winslow, Independent Fisher Glen White, Independent Fisher David Decker, FFAW Representative Bill Broderick, FFAW Representative Harvey Jarvis, FFAW Representative Johan Joensen, FFAW Representative Maureen Murphy Rustad, One Ocean



REGIONAL LOCATION PLAN (not to scale)

### NOTES

SATELLITE IMAGERY PROVIDED BY:  
NASA'S EARTH SCIENCE ENTERPRISE SCIENTIFIC DATA PURCHASE PROGRAM  
PRODUCED UNDER NASA CONTRACT, BY EARTH SATELLITE CORPORATION

BATHYMETRY DATA SUPPLIED BY HUSKY ENERGY INC. DATA GRIDDED AT 5m.

BATHYMETRIC IMAGERY RENDERING PARAMETERS:  
AZIMUTH = 315°  
ELEVATION = 45°  
EXAGGERATION = 10



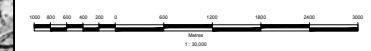
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SCALE FACTOR AT C.M. 0.9996  
FALSE EASTING: 500,000m  
FALSE NORTHING: 0m  
VERTICAL DATUM: CHART DATUM (CD)

### FOR REVISION REFERENCE

REV.	DATE	DESIGNATION	DRAWN	CHECKED	APPROVED
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### SCALE



### CLIENT



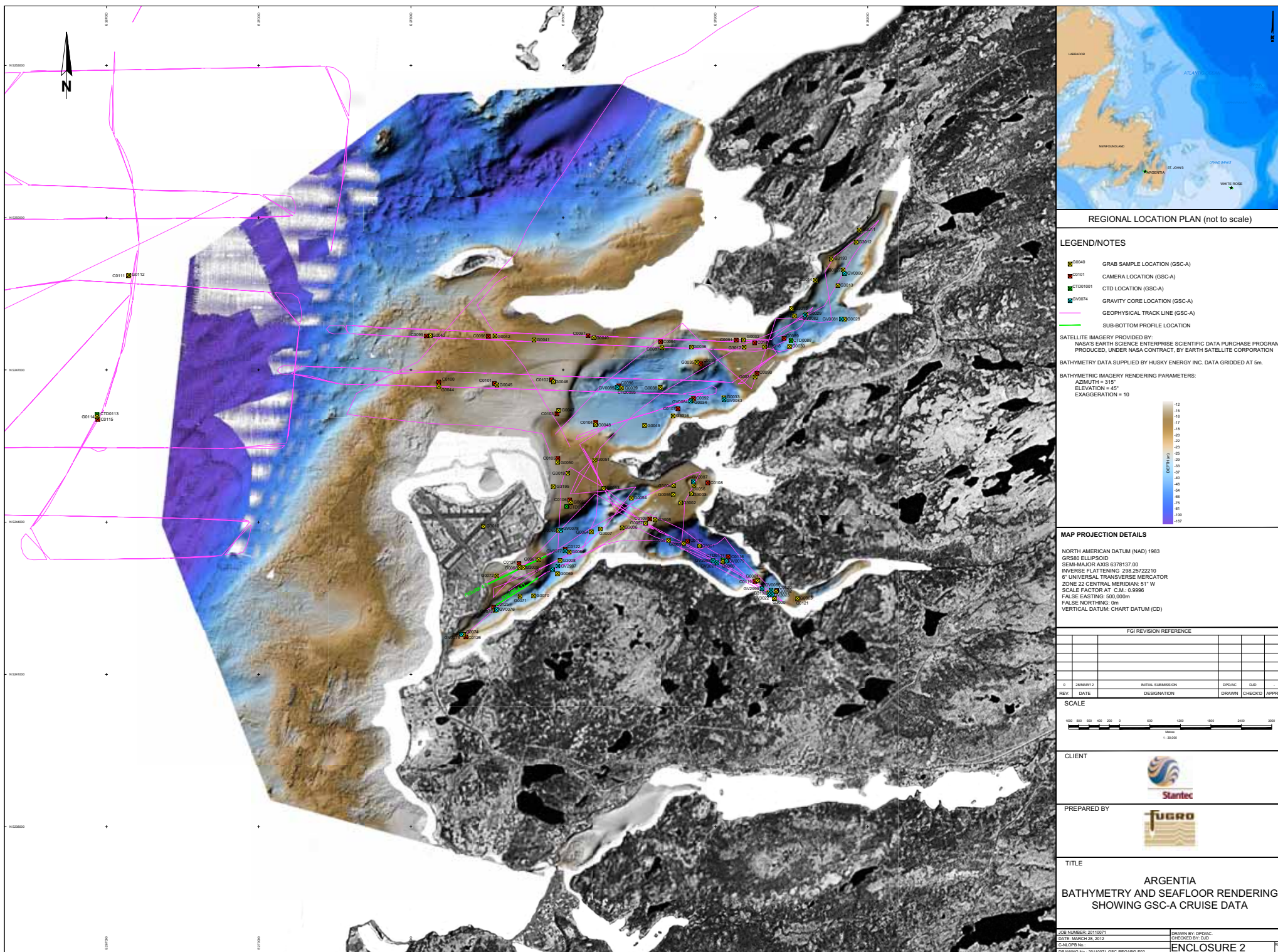
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### TITLE







ARGENTIA  
BATHYMETRY AND SEAFLOOR RENDERING





REGIONAL LOCATION PLAN (not to scale)

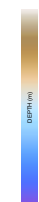
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|  | G0040    | GRAB SAMPLE LOCATION (GSC-A)   |
|  | C0101    | CAMERA LOCATION (GSC-A)        |
|  | CTD01001 | CTD LOCATION (GSC-A)           |
|  | GIV0074  | GRAVITY CORE LOCATION (GSC-A)  |
|  |          | GEOPHYSICAL TRACK LINE (GSC-A) |
|  |          | SUB-BOTTOM PROFILE LOCATION    |

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BATHYMETRY DATA SUPPLIED BY HUSKY ENERGY INC. DATA GRIDDED AT 5m.

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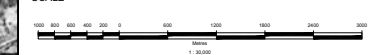
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## FGI REVISION REFERENCE

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REV.	DATE		DESIGNATION		DRAWN	CHECK'D	APPR		

## SCALE



CLIENT



## PREPARED BY



	TITLE
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ARGENTIA  
BATHYMETRY AND SEAFLOOR RENDERING  
SHOWING GSC-A CRUISE DATA

JOB NUMBER: 20110071	DRAWN BY: DPD/AC
DATE: MARCH 28, 2012	CHECKED BY: DJJ
C-NLOPB No.:	ENCLOSURE 2
DRAWING No.: 20110071-GSC-REGARD-E02	