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**Western Newfoundland & Labrador Offshore Area Strategic Environmental
Assessment / Public Comments
Presented by Reed Weir
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Introduction:

We live in a time of heightened environmental awareness. As a province we also depend on our natural resources for our economy. It should be remembered that petroleum exploration and production is only a temporary use and as such should be conducted in a way that is appropriate without leaving long lasting detrimental environmental impact that is more costly than the reserve exploited.

Drill Cuttings:

Page 42 in the SEA states:

SBM-associated drill cuttings may be discharged at the drill site provided they are appropriately treated prior to discharge in accordance with proven and practicable best available technologies and practices (defined as a concentration of 6.9 g/100g or less oil in wet solids) (NEB et al 2010).

The Oslo & Paris Commission (OSPARCOM) Decisions 92/2 & 2000/3 prohibits any discharge at sea for oil-based mud (OBM) cuttings containing more than 1% oil-on cuttings by weight

The SEA cites the use of WBMs and SBMs however I question allowing up to 6.9g/100 oil on wet to be dumped with cuttings into the Gulf when this level has been identified as unacceptable and hazardous elsewhere. I especially question this when considering the Gulf of the St. Lawrence is a semi-enclosed basin.

Hydraulic Fracturing:

The Western Newfoundland & Labrador Offshore Area Strategic Environmental Assessment briefly mentions the introduction of Hydraulic Fracturing as a means of extraction within the Gulf region. The summary is far from comprehensive. The description of the history of hydraulic fracturing is vague. The mention of the start in the 1940's and utilization since the 1950's does not consider or acknowledge the development of the technologies and processes within the methodology. There is no modeling or study on the mentioned environmental controversies or concerns. The report points out the successes but does not acknowledge or explain the failures or negative impacts.

A comprehensive study and analysis of the environmental concerns should be completed within the context of a comprehensive Environmental Impact Statement that is pertinent to the specifics of this region. The potential damages and the environmental impact should be modeled and the information on the process should be attained from an independent non-governmental scientific non-industry source.

One particular concern that remains unanswered for me regards natural oil seeps. Oil seeps are known to occur in Western Newfoundland. Natural oil seeps can occur if existing faults (fractures) extend from the source rock to the surface or if the source rock is tilted and reaches the surface. If there are faults or natural fractures, there may be some natural hydrocarbons in the groundwater. I am aware the Government and companies have been looking into seeps offshore. This should be examined and no drilling should be allowed to proceed until it is determined the fracking waters will remain isolated.

There should be models created on how and what baseline data will be taken of the ocean floor previous to any onshore to off shore activity, the monitoring during and after, and the recovery plan should there be environmental degradation.

Legislation:

Saying that all hydraulic fracturing would require environmental review by the C-NLOPB through Environmental Assessment legislative is not enough information. The legislation itself should be analyzed and studied.

What is not addressed is whether the legislation regulations are adequate to address the development of unconventional methodologies. For example if in situations such as Shoal Point where the wells are placed closer to the water than regulation standards by permission of the Provincial Government what will be affected should there be a blow-out or any other industrial incident? There should be a review of the legislation and associated regulation and policies. This includes the division of legislation regulation between the exploration and development stage and the introduction of multiple fracture stimulation methodologies including hydraulic fracturing. Discussion of full field development should occur at an earlier stage and the discussion should be open to public debate.

Health Impacts:

In the section on Human Impacts there is no reference to or study on the potential impact on human health. Human health will be affected. Humans cannot be separated from the environment. A comprehensive study on the Health Impacts on Humans is required and it must to be specific to the region.

Environmental Impact Statement:

The Strategic Environmental Assessment Update for Western Newfoundland Update gives an over view of concerns and potential hazards. It does not however give any predictions or models of what will occur should any of these be realized. An example of such is illustrated by the report's history of spills but no indication as to cost or effect should one occur. Other areas without modeling include air quality to look at air pollution or any modeling of routine discharge plumes.

The Strategic Environmental Assessment Update for Western Newfoundland as it stands is but a starting point for what is required before any development is allowed to proceed. What is required is a more comprehensive Environmental Impact Statement that will describe both the positive and negative environmental effects of proposed petroleum development.