

January 7 2007

C-NLOPB  
140 Water St.  
St. John's NL

To Whom It May Concern:

Please consider the following comments on the production volume increase for the White Rose Project:

1. The test in July 2006 did not include produced water discharges
  - Will the C-NLOPB re-evaluate of the increased production when the FPSO begins to generate produced water (and continue to do so as the volume of produced water increases)? Specifically, is the 24 hour average oil content for produced water at or below the 2007 target Waste Treatment Guidelines? (Relevant to this request is the Terra Nova production increase – where are the data on oil content discharges related to produced water – did the Terra Nova experience a decrease in the ability to meet 2007 target Waste Treatment Guidelines with increased daily oil production?)
  
2. What is the relationship between frequency of batch spills and increased daily production? In the White Rose EA (2001 pg 416), it was noted that “Developing predictions of frequencies for such spills is difficult at this time because the design of the loading/lifting system has not been finalized.” Providing an update on this issue would be important for this request because of the expected increased frequency of offloading.

Regards,

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