

From: DFO
Sent: Friday, January 27, 2017 2:50 PM
To: Hicks, Darren
Subject: RE: Statoil Exploration/Appraisal/Delineation Drilling Program, CEAR No. 07-01-32083

Hello Darren:

Review of the submitted response to previous comments on the EA Amendment has been completed. Using our comments provided in email dated August 24, 2016 and as noted within the document "Statoil Response to Regulatory Comments 2016 Drilling Amendment December 14, 2016" I offer the following comments for your consideration.

* Comment #3 - "Section 1.2 Proposed Project modifications (page 5) Section 2.2 Planned Activities for 2016 (page 8) and Section 2.3.2 Increased Number of Wells (page 10) – Further to comments provided on January 15, 2015 arising from review of the Statoil EA Update for 2016 the proponent should indicate the probable drilling / well locations planned for 2016 – 2019 especially whether or not any such wells will be located within or near any of the NAFO Vulnerable Marine Ecosystem (VME) areas or other sensitive marine areas depicted in Appendix A – Figure 1."

o The response provided has not fully addressed our comment. More specifically "...whether or not any such wells will be located within or near any of the NAFO Vulnerable Marine Ecosystem (VME) areas or other sensitive marine areas.." While it is accepted that at this point in time it may be difficult to identify well locations for the planned program it is felt that an indication of whether any planned wells will be located within or near existing VMEs and/or EBSAs will be provided within subsequent annual EA updates. This type of notification was included in the 2010, 2011, 2012, 2014 and 2015 annual updates submitted for the previous program EA.

* Comment #4 – "Section 2.3.4 Well Decommissioning Page 12) – based on the proposed well head decommissioning plan information should be provided (either now or in subsequent EA annual updates) on the location and number of well heads that will fall into each of the three categories noted - i.e. water depths less than 500 m, depth between 500 and 1500 m and depths greater than 1500 m."

o This comment has been fully addressed in the proponent's response and December 2016 EA Amendment.

* Comment #5 – "Section 3.5 Species at Risk - Table 3 (page 18) – with respect to Atlantic salmon the population assessed as threatened by COSEWIC is the south Newfoundland population rather than the "Newfoundland Population". This element of Table 3 should be amended accordingly."

o This comment has been fully addressed in the proponent's response and December 2016 EA Amendment.

* Comment #6 – “Section 4.1 Focus and Findings of the Original Environmental Assessment (page 20) – this section should provide; a summary description of VMEs and sensitive marine areas within the project area, an indication whether drilling activities have / or will occur within or near such areas, and mitigation measures that will be implemented to protect such areas”

o While the response and the revised section in the December 2016 EA Amendment provide a very good summary description of VMEs and sensitive marine areas within the project area, the response / description has not fully addressed our comment. More specifically there has been no “...indication whether drilling activities have occurred within or near such areas”. To fully address our previous comment it is felt that wellhead location information presented in Figure 2 (page 6 December 2016 EA Amendment) should be included within Figure 3 Location of Special / Sensitive Areas in Relation to Project Area (page 17 December 2016 EA Amendment).

* Comment #7 - “Section 4.1 Focus and Findings of the Original Environmental Assessment (page 20) – 2nd bullet Last paragraph indicates that project mitigation procedures include “pre and post drilling ROV surveys” it should be noted what the results of such surveys have been, and whether they provide information to validate impact predictions made within the original EA and the assessment of effects relative to the expansion of drilling activity by Statoil presented within the 2016 EA Amendment”

o The response has addressed our comment. While the response indicates that “...the data can be used in subsequent environmental assessment to provide more information on the location of corals in the area...”, there is no such information provided in Section 3.1 of the December 2016 EA Amendment. This should be clarified and corrected if necessary.

* Comment #8 – “Section 4.2.2 Increased Number of Wells (page 22) – the first sentence of this section which notes “...a total of 15 well having been drilled as of the end of 2015...” is somewhat at odds with information presented in Section 2.1 that “..17 wells have been drilled as of the end of the 1st quarter of 2016...”

o This comment has been fully addressed in the proponent's response and December 2016 EA Amendment.

I trust that this will be helpful if you require anything further please let me know.

Regards,

Senior Biologist – Coastal, Marine Oil & Gas Development
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From: Hicks, Darren [mailto:DHicks@cnlopb.ca]
Sent: December-22-16 10:40 AM
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Cc: C-NLOPB
Subject: RE: Statoil Exploration/Appraisal/Delineation Drilling Program, CEAR No. 07-01-32083

Good morning All: please see the attached documents from Statoil and our letter requesting comments by close of business January 10, 2017.

If you have any questions please feel free to contact us.

Further details on this program may be found at
<http://www.cnlopb.ca/assessments/nhdrill.php>

Regards
Darren

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