

Environmental Protection Branch
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Mr. Andy Parker
Canada-Nova Scotia Offshore Petroleum Board
1791 Barrington Street
Halifax, NS B3J 3K9

Dear Mr. Parker: *Andy*

RE: Cohasset Project Phase II Decommissioning Information Requests for EnCana Corporation EAS #2003-463

Environment Canada (EC) has reviewed EnCana Corporation's responses to regulator and stakeholder comments on its environmental assessment (EA) document for Phase II decommissioning activities. At this time, further information on certain project elements is requested in support of ongoing efforts to prepare the *Canadian Environmental Assessment Act* (CEAA) screening.

Information requests were examined by EC, the Canada-Nova Scotia Offshore Petroleum Board (CNSOPB) and Fisheries and Oceans Canada (DFO) during our August 18th meeting to collectively confirm the appropriateness of requested information for relay to the proponent. The department remains prepared to meet with the proponent to discuss the requests if necessary.

Disposal at Sea

Given likely requirements for a Disposal at Sea permit in relation to both the *Partial* and *Full Removal Options*, EC will continue to work directly with the proponent to gather data needed to inform the screening effort, and ultimately, the permitting process. EC will advise the other Responsible Authorities on the status of the information exchange, and the need to formalize an information request, during our August 18th meeting.

EC Expertise

Consideration of Discharges to the Marine Environment

It is proposed that decommissioning activities will involve a release of corrosion-inhibited seawater (e.g., from flowlines). The proponent has determined that the release of this fluid will not result in an environmental impact because the associated chemicals were selected in accordance with Chemical



Selection Guidelines¹. Adherence to the guidelines does not preclude the potential for deleterious impacts to fish.

Information is requested from the proponent to help establish whether releases associated with the undertaking would be in compliance with the Fisheries Act (Section 36).

Management of Hazardous Wastes

The *Cohasset Project Subsea Decommissioning Comparative Risk Assessment* suggests that "before onshore disposal and cutting operations commence the flowlines should be tested for hazardous materials (oils, chemicals etc) and adequate PPE (personal protective equipment) provided" (p. 51, Recommendation 37). If hazardous materials are present, it is recommended that provisions for management of these materials (e.g., handling, storage, disposal/recycling methods and location) be given further consideration in the EA given the attendant implications for potential impacts and necessary mitigation and follow-up monitoring measures.

The proponent is requested to confirm that any hazardous materials or Canadian Environmental Protection Act (CEPA) toxic substances in use during operation of the Cohasset-Panuke project (e.g., PCBs, asbestos, mercury, ozone-depleting substances) have been removed.

If hazardous materials are to be disposed of or recycled outside of Nova Scotia, CEPA regulations pertinent to transboundary movement of hazardous wastes² should be consulted.

Environmental Observer

The proponent has committed to employing an environmental observer to monitor mammal, bird and turtle species at risk.

A brief description of responsibilities assigned to the environmental observer is requested to ascertain the level of effort that will be devoted to recording marine bird observations.

Emissions to the Atmospheric Environment

The proponent indicates in the EA that project activities will be carried out in compliance with all applicable guidance and legislation. However, no emissions-related information has been provided upon which to justify conclusions regarding impacts on the atmospheric environment including cumulative impacts. Presentation of emissions-related information would be consistent with recent project EAs in Atlantic Region taking into account such guidance as the 2003 federal-provincial-territorial publication, *Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners*.

Brief descriptions of emission-generating equipment (e.g., number, type/size/horsepower of vessels) and the expected duration of the decommissioning exercise are requested to allow an estimation of emissions associated with project activities.

¹ Guidelines Respecting The Selection Of Chemicals Intended To Be Used In Conjunction With Offshore Drilling & Production Activities On Frontier Lands (January 1999) are available from www.cnsopb.ns.ca/environment/evirionment.html.

² Available from www.ec.gc.ca/CEPARRegistry/regulations/. For additional information, Ms. Marie-Josée Sirois, Hazardous Wastes Advisor can be contacted at (902) 426-3574 or at marie-josee.sirois@ec.gc.ca.

Departmental recommendations on the joint screening will be submitted shortly, taking into account the information requests. In the interim, should you have any questions, please do not hesitate to contact me at 426-5845 or Friederike Kirstein at 902-426-8066 (friederike.kirstein@ec.gc.ca).

Yours truly,



Ian Travers
Manager, Pollution Prevention Division
Environmental Protection Branch (Atlantic Region)

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