



**OFFSHORE/ONSHORE
TECHNOLOGIES
ASSOCIATION OF
NOVA SCOTIA**

November 22, 2004

C. Andrew Parker
Manager, Environment
Canada-Nova Scotia Offshore Petroleum Board
1791 Barrington Street, 6th Floor
Halifax NS B3J 3K9

CNSOPB Rec'd			
Date: NOV 22 2004			
	TO	Action	Info/Copy
1	CAP/JED/ET/BY/BBP		
2	original to file		
3			
Doc. Reg. No.: 5580			
File No.: CP54.011 30,008.8			

Dear Mr. Parker:

OTANS has reviewed the Environmental Screening Report on Cohasset Phase II Decommissioning for EnCana Corporation as prepared by Canada-Nova Scotia Offshore Petroleum Board, Fisheries and Oceans Canada and Environment Canada. The Association agrees with the finding of the report that significant adverse environmental effects are unlikely from either decommissioning option.

The screening report is exhaustive in its examination of the removal options, considering in detail the possible impacts of the project. From the evidence presented it seems clear that adopting the partial removal option, as favored by EnCana, would present no greater likelihood of adverse environmental effects.

As a proponent of industry, OTANS' chief concern is the sustainable development of offshore oil and gas. When an operator, such as EnCana, makes a responsible proposal to amend this type of process and when there is no evidence that such an amendment would have negative consequences (environmental or otherwise), OTANS feels it is in the best interests of our region's industry to permit the operator their preferred option.

Given the current state of the Atlantic offshore, the Board and other regulators must begin to consider the cost implications of their regulations to operators. Attracting and retaining these companies in our region requires the cooperation of regulators, industry and governments. The consideration of decommissioning options, particularly when the environmental impacts are equivalent, are a prime example of how Boards can defer to operators' concerns and thereby foster a more investment-friendly climate in our region.

OTANS thanks the Board for their outstanding and thorough study of this issue, and look forward to continuing our mutual efforts towards a sustainable offshore industry.

Sincerely,

Paul McEachern
Managing Director,
OTANS