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Environmental Assessments & Major Projects
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July 6, 2009

Eric Theriault, Environment
Canada-Nova Scotia Offshore Petroleum Board
6th Floor, TD Centre
1791 Barrington Street
Halifax, Nova Scotia
B3J 3K9

Dear Mr. Theriault:

RE: Comment on EnCana Corporation 2009 Drilling Environmental Protection Plan/Environmental Effects Monitoring Plan (EPP/EEMP) for the Deep Panuke Project (DMEN-D00-RP-EH-90-0001.01U)

This letter outlines Fisheries and Oceans Canada's (DFO) comments regarding the EnCana Corporation 2009 Drilling Environmental Protection Plan/Environmental Effects Monitoring Plan (EPP/EEMP) for the Deep Panuke Project (DMEN-D00-RP-EH-90-0001.01U). Briefly, the EPP/EEMP outlines measures that the EnCana Corporation proposes to implement during drilling activities associated with the re-entry of four existing wells and drilling of one new acid gas injection well in the offshore of Nova Scotia. Drilling activities will be carried out by Rowan Companies Inc. with the jack-up drilling rig Rowan Gorilla III. Activities will commence in mid-August 2009 and last approximately six months.


In general, DFO believes that the proposed best practice, compliance, and mitigation outlined in the EPP/EEMP are suitable measures to minimize conflict between the activity with the marine ecosystem and other ocean users. For example, the use of water-based mud for drilling is appropriate, as is the plan to restrict the use of barite in the drilling fluid to specific situations. That being said, DFO has some specific comments that the Canada-Nova Scotia Offshore Petroleum Board may want to consider in its review of the EPP/EEMP:

1. The last paragraph on Page 7 refers to "non-intrusive aspects of the proposed activities" – a better term may be 'low risk'. Lats/longs may also be added to Fig. 1.2 on Page 8.
2. A field monitoring program may be considered to confirm the drill waste dispersion modeling and analysis conducted in the 2006 Deep Panuke EA (Volume 4). This would provide verification of predicted minimal impact levels.

3. The EPP/EEMP does not address in detail specific aspects of the drilling activities. In the event drilling activities include actions such as casing pile driving and well-head severance that generate noise at a level or duration that may influence marine species, further applicable mitigation should be considered.
4. A statement regarding the likelihood and mitigation measures associated with a well blow-out (e.g. release of condensate) should be included in Section 7: Spill Response.
5. The proposed monitoring plan does not address species at risk issues, although a number of sensitive species may reside in the area during the period of drilling activities. The EPP/EEMP should recognize the potential for interaction with species at risk and, if applicable, may consider a program to monitor these species using standard, accepted practices (e.g. marine mammal observer).

If you have any questions or concerns regarding these comments please do not hesitate to contact me by telephone, 902-426-3150, or by email, Kristian.Curran@dfo-mpo.gc.ca, at a time convenient to you.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Curran', with a stylized flourish extending to the right.

Kristian Curran
A/Environmental Assessor