

# Connect with our *energy*

Petroleum Office  
Guysborough County Regional Development Authority  
P.O. Box 49  
46 Main St.  
Guysborough, N.S.  
B0H 1N0

Paul Schafer, Project Analyst  
Canadian Environmental Assessment Agency  
160 Elgin St.  
22<sup>nd</sup> Floor,  
Ottawa, Ontario  
K1A 0H3

July 9, 2007

**Re: Comments on the conclusions and recommendations for the  
Comprehensive Study Report for the proposed  
Deep Panuke Offshore Gas Development Project**

Dear Mr. Schafer:

The Petroleum Office of the Guysborough County Regional Development Authority submits the following comments on the Deep Panuke Offshore Gas Development Project. Our comments on the report prepared by the Responsible Authorities for the project relate only to those impacts associated with the Maritimes and Northeast Export Pipeline option.

Our mandate includes the advancement of oil and gas projects in our area but not at the expense of existing livelihoods. The inshore lobster fishery contributes significantly to the local economy and we listen to what the fishermen have to contribute in terms of the impacts of projects in the area particularly in this case their experience with the SOEP pipeline installation.

The Comprehensive Study Report (CSR) identified and assessed the impact of construction activities on the fisheries in the area. In particular, if Horizontal Directional Drilling is not chosen to install the pipeline in the nearshore we would like to address the impact of pipeline installation on the inshore fisheries and aquaculture leases in terms of:

- 1) Arsenic (As) and mercury (Hg) contamination from legacy gold mining activities in the nearshore area of Dung Cove; landfill site of the export M&NP option.
- 2) The potential impact of suspended sediment on the inshore fisheries and aquaculture leases due to pipeline installation and finally
- (3) The potential damage of the benthic habitat if an anchor pipe laying vessel is used to lay the pipeline.

### **As, Hg Contamination in the nearshore**

Reference: page 108 Section 8.1.1 Biophysical Environment

*“Arsenic and mercury concentrations in surface sediments at the sampling point nearest EnCana’s proposed nearshore pipeline corridor indicated arsenic levels between 4-10 ppm and mercury concentrations between 5-43 ppb (EnCana Corporation, 2006). Furthermore, sampling during the Deep Panuke 2001 nearshore pipeline route survey found no evidence of sediments contaminated from old mine tailings (refer to Section 6.3.9.3 of the approved 2002 CSR). Therefore, it is not expected that sediments contaminated by old mine tailings will be encountered during construction of the M&NP Option pipeline”.*

A provincial environmental review of the Keltic/Maple LNG project was privy to the same data that EnCana, SOEP, and the GSC had in terms of As, Hg distribution in the nearshore area including Dung Cove. The UARB still recommended as a condition of environmental approval that a sediment sampling survey be conducted in all areas of the nearshore of Goldboro including Dung’s Cove prior to any construction activity. It is unclear if the SOEP data used by EnCana were taken at depths sufficient to cover down to the depth that the pipeline will be buried. These contaminated sediments sit well below the surface.

*As per the recommendations of the UARB we would recommend that the report add an additional recommendation that EnCana conduct a pre-trench sediment sampling survey along their proposed inshore route of sufficient detail and depth to determine that indeed the pipeline route sediments are free of mercury and arsenic.*

### **Suspended Sediment**

Page 157 *“The sediment in the study area is composed of fine to coarse grain sand that settles quickly upon disturbance. Installation will result in localized increases of suspended particular matter (SPM)”*

EnCana has agreed to the use of sediment silt curtains where feasible to reduce the impact of suspended sediments in the water column. Our conversations with the local fishing industry and aquaculture lease holder have indicated that from their perspective the above quoted statement was certainly far from accurate during the SOEP pipelaying experience. Sediments drifted up Isaacs Harbour and over to Fishermen’s Harbour. The degree of impact will vary greatly depending upon wind direction, strength, duration of wind and the pipeline pre-lay and installation method.

*We would like the CSR report and recommendations to specifically address the use of silt curtains to reduce the impact and dispersion of sediment during pipeline installation.*

### **Post Lay Survey of Benthos**

*Should EnCana opt to use an anchor pipe laying vessel to install the export pipeline, we would like the report to specifically address that the post lay survey assess the impact of*

*the anchors on those areas of the benthos where the anchors touched or dragged the bottom. There are 6-8 anchors on this type of vessel and in the course of pipeline installation it should touch down over one hundred times on the way in to shore.*

Thank you for considering our comments, we want to ensure that all measures are undertaken to reduce the impact of the pipeline installation in the nearshore. What one company does or does not do impacts on our ability to advance the next project in the area. Our experience has also demonstrated that impact reduction or mitigation measures should be made a condition of approval to ensure that they are carried out.

Respectfully submitted,  
Gordon MacDonald  
Special Projects Manager  
GCRDA – Petroleum Office  
Sent via e-mail  
paul.schafer@ceaa-acee.gc.ca