



June 22, 2004

Mr. C. Andrew Parker
 Manager, Environmental Affairs
 Canada-Nova Scotia Offshore Petroleum Board
 6th Floor, 1791 Barrington St.
 Halifax, NS B3J 3K9

Via Facsimile & Mail: (902) 422-1799

Dear Mr. Parker:

Re: Cohasset Phase II Decommissioning

CNSOPB Rec'd			
Date:		JUN 23 2004	
	TO	Action	Info/Copy
1	CAP	ET	
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3	Orig to file		
Doc. Reg. No.:		4612	
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We have reviewed EnCana's proposed amendments to the Cohasset Project Development Plan as well as the Environmental Assessment that has been submitted to the Board. Clearwater has serious concerns with respect to the abandonment option being proposed.

Clearwater has identified a significant quahog resource on Sable Island Bank and is moving toward commercialization of this resource. The analysis provided in the environmental assessment does not meaningfully address this developing fishery and the catch and effort data included in the report gives the false impression that there is not a significant resource or fishery in the area. Clearwater has made a substantial investment in scientific research delineating this resource and joint industry/DFO survey work undertaken in 2003 indicates a biomass in the range of 1.4 million metric tonnes.

The Cohasset field is in close proximity to major densities of quahog identified in the 2003 survey and it is clear from the survey results that there is exploitable quahogs biomass within the field itself. It is not possible to precisely quantify this biomass because the survey was not able to sample the area of the Cohasset field. This resource will remain inaccessible to the commercial quahog fishery unless the structures on the seafloor are removed. The quahog fishery is prosecuted using hydraulic dredge gear which cannot operate in areas where there is risk of seafloor obstructions.

Clearwater recommends that the Board hold EnCana to their commitment to remove all structures from the seafloor. Failure to insist that the conditions of the original development proposal are met will set a serious precedent that could leave the seabed littered with obstructions to fishing and be a serious detriment to the development of the quahog fishery. Clearwater will have difficulty supporting future development projects if



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the Board does not show a commitment to hold the proponents to the terms and conditions of the development plan.

Thank you in advance for considering our concerns and recommendations in your review of the proposed decommissioning plan.

Regards,



Christine Penney
Director of Corporate Affairs
Clearwater Seafoods Limited Partnership