

Nancy Hynes

From: Thillet, Marielle [marielle.thillet@encana.com]
Sent: June 24, 2011 4:15 PM
To: Eric Theriault
Cc: Jayne.Roma@EC.GC.CA; Humphrey, Donald; Document Control; ^CNSB
Subject: ECA/CNSB/E-0559: Comments on PFC Installation and Deep Panuke Field HUC EPP/EEMP
Categories: 30-008-23, EDP47-008

Hi Eric,

Please find below responses to your comments on the PFC Installation and Deep Panuke Field HUC EPP/EEMP.

1. Noted.

2. As mentioned in Section 6.3 of the document, the 2009 Offshore Pipeline Installation EPP/EEMP, DMEN-P21-RP-EH-90-0002, describes where and how dewatering of the GEP will occur.

3. *Appendix B, commitment 2.43:* The study to evaluate fugitive emissions on the PFC was conducted during detailed design and a report entitled PFC Management of Fugitive Emissions (DMSB-X00-RP-LC-37-0101) was issued and submitted to the CNSOPB on February 5, 2009. Clarifications have been issued to the CNSOPB and the CNSOPB have confirmed that they have no further comments. As part of the study, the design of the Deep Panuke PFC facilities, including relevant vendor package specifications, was reviewed in light of the CAPP Best Management Practice on fugitive emissions. It was found that best practices on the minimization of fugitive emissions are generally implemented into the design and specifications of the facilities. This was expected given that the PFC is a sour gas installation where health and safety concerns drive the minimization and control of leaks. This report focused on the hardware means of managing fugitive emissions. In order to address operational management of fugitive emissions, the PFC will undergo a comprehensive N₂/He leak test prior to First Gas to confirm the integrity of the facility for start-up. In the meantime, Encana is developing a Directed Inspection and Maintenance (DI&M) Program to be in place after First Gas.

3. *Appendix B, commitment 2.54:* Encana had agreed with Environment Canada to set up a meeting to address both commitments #2.53 and 2.54 together (the configuration of the turbines and compliance of the turbines emissions with *CEPA Ambient Air Quality Guidelines* and *Provincial Regulations for Ground Level Emissions*). We have been working with SBM over the last few months to complete the study addressing commitment #2.53 (turbine emissions modeling report). This report has just been approved internally and we are now in the process of preparing a slide presentation on both commitments which we hope to present to EC in early July. I will contact EC (Michael Hingston) directly to arrange a date for that meeting.

4. The volume of umbilical preservation fluid (11 m³ of MEG mixed with 11 m³ of water) is based on the total length and diameter of the umbilical hoses that are preserved. This volume cannot be reduced. This MEG/water mixture needs to be discharged overboard because it is being displaced with the fluid required for the operations phase which is methanol. Methanol is miscible in MEG/water and there is no way to definitively predict when the methanol may be carried back to surface while displacing the volume. Methanol is a flammable liquid and handling it by collecting in totes or tanks is considered an unreasonable risk; particularly when a safer option, discharging overboard, is in compliance with the OWTG (Section 2.16, Discharges Associated with Installation and Maintenance of Subsea Systems). The MEG/water mixture will be discharged at a rate of 1 m³/hr; it will be diluted with the PFC seawater lift pumps (at 1670 m³/hr) and will occur over a week long period. The discharge will not include any hydrocarbons and as mentioned in the EPP/EEMP, MEG has been screened and rated as "accepted for use and discharge" according to the *Offshore Chemical Selection Guidelines* (it has a PLONOR rating, which is the least hazardous category).

Regards,

27/06/2011

Marielle.

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From: Eric Theriault [mailto:ETheriault@cnsopb.ns.ca]
Sent: Thursday, June 23, 2011 12:30 PM
To: Thillet, Marielle
Cc: (Jayne.Roma@EC.GC.CA); Humphrey, Donald; Document Control
Subject: RE: ECA/CNSB/E-0502: PFC Installation and Deep Panuke Field HUC EPP/EEMP

Marielle:

We have completed a review of the PFC Installation and Deep Panuke Field HUC EPP/EEMP. Environment Canada and DFO have participated and provided comments on this document. Please find below comments/questions on the subject EPP/EEMP:

1. In general, the standard mitigation measures provided in the EPP appear appropriate.
2. Section 1.2.1. The third bullet states that pressure testing and dewatering of the GEP and flowlines will take place. Where and how will dewatering of the GEP occur?
3. Section 6.2 briefly acknowledges air emissions that will be generated by the proposed activities but states that they have already been addressed in S. 8.10 of the Production EPCMP. EC provided comments to the Board on that air section. I have purposely delayed providing you with comment on the Production EPCMP due to the start-up date of installation and first gas. EC's comments were:
 - *Appendix B, commitment 2.43* - This commitment does not appear to be addressed in either S. 8.10 or 12.0. Please provide additional detail on the results of the study and measures that will be put in place to reduce fugitive emissions (e.g. leak detection and repair procedures).
 - *Appendix B, commitment 2.54:* - To EC's knowledge, this commitment has not yet been met. As per a discussion with EC on November 16, 2010, the proponent committed to confirming the use of best available emissions technology once the final design specifications became available. At that time, it was expected that the information would be made available at the end of January. No information has been received to date.
4. Section 6.3 acknowledges that 11 m3 of preservation fluid (MEG and water) will be released at the surface during commissioning of the umbilical's. As per S. 1.3 of the OWTG (Dec 2010), EC recommends that the proponent demonstrate how they have in fact minimized the volume of this waste and provide an explanation as to why it is not being recovered.

If you prefer, a response to the above comments/questions can be done by e-mail.

As a general comment, certain sections of this plan defer to details contained in other pending plans - namely the Spill Response Plan (EnCana resubmitted a revised Plan this week and sent a copy to EC and CCG), and the revised Production EPCMP. EC indicated that they wish to reserve more detailed commentary until such time as those plans are submitted for review.

27/06/2011

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From: Thillet, Marielle [mailto:marielle.thillet@encana.com]
Sent: May-17-11 9:08 AM
To: Eric Theriault
Cc: Don Logan; Document Control; ^CNSB
Subject: ECA/CNSB/E-0502: PFC Installation and Deep Panuke Field HUC EPP/EEMP

Hi Eric,

Please find attached Encana's PFC Installation and Deep Panuke Field HUC EPP/EEMP for distribution to DFO and EC.

This document will be submitted to the CNSOPB shortly as part of the work authorization application for the PFC installation and HUC program as well as for the diving program authorization but I am sending you the EPP/EEMP in advance so you can distribute it to EC/DFO as soon as possible considering the review time line (the program is tentatively scheduled to begin early July).

Regards,

Marielle.

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