

Seafood Producers Association of Nova Scotia

P. O. Box 991, Dartmouth, N. S. B2Y 3Z6
Phone: (902) 463-7790 Fax: (902) 469-8294
E-mail: spans@ns.svmpatico.ca

June 23, 2004

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

Dear Mr. Parker:

Re: Cohasset Phase II Decommissioning

CNSOPB Rec'd			
Date:		JUN 23 2004	
	TO	Action	Info/Copy
1	CAP	ET	
2			
orig to file			
Doc. Reg. No.:		4622	
File No.:		30,008.8/CP54,011	

We are providing comments and concerns with respect to the CNSOPB screening of the proposed Phase II Decommissioning of the Cohasset Panuke structures. We have reviewed the project description prepared by EnCana Corporation and are seriously concerned about the proposed decommissioning plan's impact on the fishery.

Our concerns are:

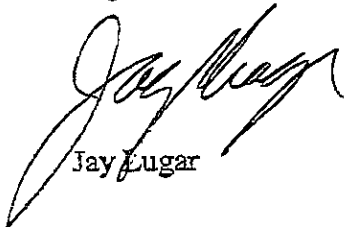
1. When the original Cohasset-Panuke Development Project Agreement was adopted by the CNSOPB for a previous owner of the Cohasset-Panuke project it included a commitment for the removal of all equipment related to the project upon completion of the project. It is unacceptable for EnCana to now say that new circumstances warrant abandoning equipment on the sea floor. A commitment is not merely an indication, it is a full commitment that must be completed, otherwise an initial project review process is meaningless. EnCana now states that it is "less disruptive" to the environment to leave flowlines and mattresses in place than it is to remove them. Environmental considerations are a separate matter and should not be used to confuse or complicate the fact that the operator of the project committed to removing the equipment.
2. Any fishing gear that uses the sea floor could be impacted by flowlines and other equipment that are abandoned. The EA describes the current level of sand and other coverage of the gear, which varies from nil to 85 percent. The marine environment in the area is vigorous and items on the sea floor are covered and uncovered all the time. There is no guarantee the flowlines and other gear will not be a hazard to fishing soon or at some time in the future. It is insufficient that EnCana proposes to compensate for gear damage. Fishing vessels should not be required to jeopardize fishing or their gear by equipment left on the sea floor when that equipment could be easily be removed.

- 2 -

3. A new ocean quahog fishery set to start in 2005 in the area will be substantially impacted by abandoned flow lines and other equipment left on the sea bed. The Environmental Assessment treats the impact of abandoned equipment on this fishery the same as the impact on other mobile gear fisheries (page 4-24). There is a substantial difference, however, that is ignored and that manifestly changes the perceived minimal impact. This fishery uses a hydraulic dredge that fishes on sandy, unobstructed bottom. This gear would be severely damaged if it hit equipment left on the sea floor. To avoid potential gear damage and to avoid major disruption to the fishery, the flowlines, mattresses and other equipment must be removed from the sea bed. These fishing vessels would be prevented from approaching an area where flowlines and equipment had been abandoned.

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

Regards,



Jay Lugar