

JD Roche

From: Barbara Pike
Sent: Friday, June 18, 2004 11:39 AM
To: JD Roche
Subject: FW: BEPCo Exploratory Drilling Program per SWNEPG-File 30,008.14

Categories: ~~30-008-14~~, BA50-001



BEPCoCommentsS
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-----Original Message-----

From: anne smith [mailto:anne.smith@ns.sympatico.ca]
Sent: Friday, June 18, 2004 11:18 AM
To: Barbara Pike
Subject: BEPCo Exploratory Drilling Program per SWNEPG

Dear Barbara: I'm attaching a copy of the submission by the South West Nova Environmental Protection Group regarding the BEPCo Exploratory Drilling Program. I hope you can get it into the right hands as the deadline is today at noon, and I have no other way to meet it than by e-mail. Please let me know if this is okay. My best. Anne

BEPCo Canada Company's intent to drill a maximum of six exploratory wells over a period of 5 years indicates a long-term plan is in place, although it has not been adequately clarified in the Scope of Comprehensive Study or the Project Description documents.

No forward-looking venture confronts the hostile waters and "the worst climate on the planet" to drill kilometers deep into the seabed and the earth's crust, without first conceptualizing a practical plan in the event of a successful outcome. Obviously, with such a project, the Offshore, the Inshore and the Onshore are inexorably linked.

From the proponent's perspective, an onshore base is imperative. Securing a location for pipeline/plant operations and storage facilities is a prerequisite. Although details may have to be finalized, and possible alternatives considered, selecting pipeline routes and onshore sites would not be left to last-minute decisions.

Understandably, that particular planning priority is of great public interest and concern, and the South West Nova Environmental Protection Group would need to know more information on the project and its impacts to be able to comment on whether the EA should proceed by way of a comprehensive study or panel review.

The Project Description:

Environmental Setting, Section 3, acknowledges the presence of a profusion of species in the proposed drilling area or in its proximity. Classifications include: endangered, protected, "at risk", "of special concern", as well as ecologically sensitive and/or protected Special Places, such as the haddock nursery Closure Area, and the known Coral area.

Socioeconomic Setting Section 3.2.1 Fishery areas: lists the many fish species that sustain the local economy, provide nutrition, and contribute to provincial revenues, including exports. Concentrations of fish eggs and larvae form breeding grounds for renewal of the stocks. A special mention should be made of the vital and lucrative Lobster Fishing Areas – this, in fact, the Lobster Capital of Canada, bringing hundreds of millions of dollars into the local and provincial coffers on a regular basis.

"Climate Change" is mentioned only as two words in the Scoping Document, but demonstrations during the past year have presented dramatic and unusual events: i.e. the massive ice field, and Hurricane Juan. Future environmental assessments will have to be updated to include the probability of more damaging weather patterns, in particular the immediate threat of a season of greatly increased hurricane activity in Nova Scotia.

The Scope of the Comprehensive Study should include forward looking but very practical considerations, such as: the end use of the gas; the alternatives to the project; the need for the project generally.

The Project Description, page 24, comments "... the Scotian Shelf and Slope are also becoming a stage for proposed future gas transmission projects , which primarily involves construction of pipelines to Nova Scotia and the Eastern United States."

The South West Nova Environmental Protection Group was formed as a direct response to one of those proposals. In 2002 hundreds of homes were notified of a plan by El Paso Corp. to pipe natural gas from offshore Nova Scotia to one of three locations in Shelburne County. A projected plant would then process the sour gas, and transmit the product 1,000 miles via a 32" or 42" subsea pipeline exclusively to markets in the Northeastern United States.

The effects and liabilities of processing sour gas in populated areas are known; the impact on the environment – marine, flora and fauna, birds, water, soil, air, and as a consequence, human health and safety – is acknowledged.

The proposal, under the benign name Blue Atlantic Transmission System, elicited strong opposition from individuals and organizations at both ends of the proposed pipeline route, in the U.S. and Canada. Environmental Protection organizations lent their weight and support: the Ecology Action Center, the Canadian Sierra Club, the American Sierra Club, etc. Our public meeting drew excellent attendance; television and print media coverage has been intense and interest is ongoing.

To date, El Paso Corporation, in partnership with Canadian Superior Oil and Gas, has failed in three attempts to discover gas in a commercial quantity.

In summation, more in-depth information is essential before making a decision of this magnitude and consequence.

The South West Environmental Protection Group wish to be kept closely informed and notified of all opportunities for consultation.

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On behalf of
the SouthWest Nova Environmental Protection Group
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