



Canadian Environmental  
Assessment Agency

Agence canadienne  
d'évaluation environnementale

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Mr. Eric Theriault, P.Eng.  
Advisor, Environmental Affairs  
Canada-Nova Scotia Offshore Petroleum Board  
TD Centre, 6<sup>th</sup> Floor  
1791 Barrington Street  
Halifax, NS  
B3J 3K9

September 9, 2004

Dear Mr. <sup>Eric</sup> Theriault:

**RE: Environmental Assessment Report, Exploratory Drilling on EL 2407, BEPCo.  
Canada Company**

The Canadian Environmental Assessment Agency (the Agency) has reviewed the above-captioned report. Comments are attached for your consideration.

The Agency's review focused on whether the information meets the requirements of the *Canadian Environmental Assessment Act* (the Act). The review did not address the technical or scientific validity of the information presented in the document as this is the purview of the responsible authority and expert federal authorities.

Please contact me if you require further information.

Yours truly,

Derek McDonald, P.Eng.  
Senior Program Officer

Attachment

cc S. Chapman, CEAA  
B. Coulter, CEAA  
F. Kirstein, Environment Canada  
P. Zamora, Fisheries and Oceans Canada



7. 10. 2020

№	Имя	Фамилия	Отчество	Дата рождения	Пол	Специальность	Стаж	Средний балл	Средний балл по предметам	Средний балл по курсу
1	Иванов	Иван	Иванович	10.10.1998	М	Информационные системы	1	4,5	4,5	4,5
2	Петров	Петр	Петрович	15.11.1999	М	Информационные системы	1	4,0	4,0	4,0
3	Сидоров	Сидор	Сидорович	20.12.2000	М	Информационные системы	1	3,5	3,5	3,5
4	Климов	Климов	Климович	25.01.2001	М	Информационные системы	1	3,0	3,0	3,0
5	Васильев	Васильев	Васильевич	30.02.2002	М	Информационные системы	1	2,5	2,5	2,5
6	Мухоморов	Мухоморов	Мухоморович	05.03.2003	М	Информационные системы	1	2,0	2,0	2,0
7	Попов	Попов	Попович	10.04.2004	М	Информационные системы	1	1,5	1,5	1,5
8	Смирнов	Смирнов	Смирнович	15.05.2005	М	Информационные системы	1	1,0	1,0	1,0
9	Иванов	Иванов	Иванович	20.06.2006	М	Информационные системы	1	0,5	0,5	0,5
10	Петров	Петров	Петрович	25.07.2007	М	Информационные системы	1	0,0	0,0	0,0

**Canadian Environmental Assessment Agency  
Comments on  
Environmental Assessment Report  
Exploratory Drilling on EL 2407, BEPCo. Canada  
Company**

**September 9, 2004**

**Scope of Project**

BEPCo. Canada Company is proposing to conduct an exploration drilling program offshore Nova Scotia on the Scotian Slope, within the Canada-Nova Scotia Offshore Petroleum Board (the Board) issued exploration licence (EL) 2407. The program entails the drilling of 1 to 3 wells between 2005 and 2007 and 1 to 3 appraisal wells between 2008 and 2009.

For the purposes of the Act, the Agency recommends that the Board assess the effects of the maximum number of wells that could be expected during the drilling program. All modelling, figures and analysis in the comprehensive study report should be based on the maximum activity that could be expected to occur during the drilling program.

**Cumulative Effects**

The report has incorrectly considered the interaction of effects between the six potential wells as cumulative effects (within-project cumulative effects).

Paragraph 16(1)(a) of the Act, states:

"Every screening or comprehensive study of a project and every mediation or assessment by a review panel shall include a consideration of the environmental effects of the project, including...any cumulative environmental effects that are likely to result from the project in combination with other projects or activities that have been or will be carried out".

Similar to the Agency's previous comments, the comprehensive study report should include an analysis of how the effects of the six wells could cumulatively interact with other projects or activities that have been or will be carried out.

## **Effects of the Project on Human Health**

The Act requires consideration of the effects on human health of any change in the environment caused by the project (definition of "Environmental Effect"). The comprehensive study report should therefore include an analysis of the human health effects arising from changes in the environment.

## **Follow-Up**

The report could make a better distinction between follow-up as defined in the Act and other forms of post-project monitoring. There is very little in the way of follow-up as defined in the Act.

## **Precautionary Principle**

It is unclear why the ramp-up mitigation specified on Table 5.4 (page 5-26) has the caveat "where possible". Unless there is a technical limitation, or it is cost-prohibitive, it would be consistent with the precautionary principle to commit to the ramp-up procedure. The same caveat appears in tables 5.6, 5.8 and 7.1 (although, for some reason, not for marine fish), as well as occasionally in the text where effects of VSPs or wellsite surveys are analyzed. Paragraph 4 (2) of the Act specifies that "...federal authorities shall exercise their powers in a manner that...applies the precautionary principle".

## **Other Comments**

In general, the report is well-structured and uses a logical thought process to narrow the list of potential effects, such that the focus can be placed on those of greatest relevance. Tables are used effectively. In particular, the assessment summary tables (5.4, 5.6, 5.8, 5.10, 5.11 and 5.14) are useful, as is Table 7.1 (Summary of Mitigation and Follow-up).

In the third paragraph on page 1-6, it is noted that "potential onshore activities.....will be regulated by the Province of NS". This would be a good place to state that the project is not subject to provincial environmental assessment requirements.

At the close of section 2.3.4 (Well Abandonment, page 2-9), it is stated that "leaving the wellhead in place does not pose any additional environmental risk." No rationale or analysis is presented here to support this statement. In general, the author should resist the temptation to express environmental conclusions such as this when describing the project. Those types of statements are best left to sections discussing potential environmental

effects (e.g. Table 3.3, or as discussed on page 5-67 under "Well Abandonment").

When characterizing predicted effects, the author should refrain from using unequivocal statements such as is presented in Section 5.2.1.7 (Summary of Environmental Effects Evaluation, page 5-16). Instead, use wording that is more consistent with the Act (e.g. not likely to cause significant adverse environmental effects). Whenever there is a project-environment interaction, there is rarely absolute certainty in predicting the likelihood of significant adverse environmental effects. The Act's wording should also be used in the overall conclusion (page 7-7).

It's not clear how the ecosystem analysis summary table presented on page 5-70 supports the concluding statements on page 5-71, given that it contains some "Yeses". The table should also have been numbered, titled and included in the List of Tables.

