

Nancy Hynes

From: Eric Theriault
Sent: 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
Categories: 30-008-23, EDP47-008

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.

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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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