

## Seafood Producers Association of Nova Scotia

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September 10, 2004

Mr. C. Andrew Parker  
Manager, Environmental Affairs  
Canada-Nova Scotia Offshore Petroleum Board  
6th Floor, 1791 Barrington St.  
Halifax, NS  
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| File No.:    |      | 30.008.14 / BAS001 |           |

Dear Mr. Parker:

### Re: BEPCo Canada Exploration Drilling Comprehensive Study

We are writing to provide our comments and concerns with respect to BEPCo Canada's proposed exploration drilling on EL 2407 currently being evaluated by the CNSOPB. Our comments are based on the Environmental Assessment submitted by BEPCo Canada that describes potential impacts of their proposed exploration drilling program starting in 2005.

Our comments and concerns are as follows:

#### 1. Well Head Removal.

The proponent is recommending wellheads be abandoned in place for all wells to be drilled, possibly as many as seven. The water depth is 1450 metres for the first well with the remaining wells to be drilled as shallow as 1200 metres. Wellheads represent a significant potential safety hazard for the fishery due to gear snagging. Currently there is limited fishing in the portion of EL 2407 outside 1200 metres. In other Canadian areas the fishery is active in water as deep as 1500 metres. We are concerned that these wellheads will remain in place as obstructions for many, many years and will be a safety hazard when new commercial fisheries extend to this area.

It is our understanding that all wellheads in Nova Scotian waters inside 1000 metres have been removed but wellheads in the vicinity 1700 to 2100 metres have been abandoned in place. The BEPCo proposal would represent the most shallow wellhead abandonment to date.

The fisheries industry is not permitted to leave obstructions on the ocean floor as it is considered a form of ocean dumping. We consider it rational that other industries should also be required to remove obstructions from the ocean bottom.

We recommend that the CNSOPB require BEPCo Canada remove all wellheads for wells drilled as part of their proposed exploration drilling program.

**2. Commitment for a Fisheries Observer.**

The BEPCo Environmental Assessment report includes a number of references to having Fisheries Observers on site during all exploration drilling program activities. It has been a recent focus of the Fisheries Advisory Committee of the CNSOPB that this type of commitment made by a proponent in public be specifically referenced in CNSOPB authorizations and be included in your conditions of approval. We request the CNSOPB undertake this approach for the BEPCo Canada drilling authorization and make their commitment a condition of approval.

**3. Fisheries Interaction and Impact.**

We note that there is limited fishing at the present time in the area proposed to be drilled by BEPCo Canada. There are, nonetheless, commercially important stocks of fish in the EL 2407 general area. There is a significant fishery in the shallower portions of the block and adjacent waters. We request that the CNSOPB continue with its approach for oil and gas operators to conduct exploration activity in a manner that minimizes the impact on the fishery, marine fish resources and fish habit in general. This means, to mention but a few potential mitigation measures, routing supply vessels away from areas where fishing is occurring, eliminating deleterious discharges in accordance with the Offshore Waste Treatment Guidelines or bringing all waste to shore, timing vertical seismic profiles to avoid potential impact on fish larvae and fish spawning activity and using water based drilling muds.

**4. CEAA Process.**

We note that this is the first environmental review process for Scotian Shelf and Slope exploration activity being conducted under a CEAA Comprehensive Study process. There was participant funding available for stakeholder groups to conduct a more in-depth analysis of the proposed activity. CEAA, however, did not directly notify long-standing parties in the fishery such as SPANS about the potential for funding. We request that the CNSOPB and CEAA work together to disseminate information to fisheries representatives through the FAC or another direct method to ensure all potential participants are aware of all aspects of the review process.

Thank you in advance for considering our concerns and recommendations in your review of the proposed exploration drilling program.

Regards,

Jay Lugar

## JD Roche

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**From:** Andy Parker  
**Sent:** Monday, September 13, 2004 9:05 AM  
**To:** Document Control  
**Subject:** FW: SPANS comments on BEPCo Canada proposed drilling program  
**Categories:** 30-008-14 / BA50-001

-----Original Message-----

**From:** Jay Lugar - SPANS [mailto:jay.lugar@ns.sympatico.ca]  
**Sent:** Friday, September 10, 2004 3:52 PM  
**To:** Andy Parker  
**Cc:** Eric Theriault  
**Subject:** SPANS comments on BEPCo Canada proposed drilling program

Hi Andy:

Please find attached a letter from SPANS to the CNSOPB pertaining to your review of BEPCo Canada's proposed drilling program.

I do not plan to provide a fax or hard copy of the letter so please let me know if this is required.

Rgds, Jay

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