

Good Afternoon Amanda/Meaghan,

Thank you for providing me with an opportunity to obtain clarity on the draft CEAA Report and the potential conditions. The key areas discussed included Conditions 4.2.6, 6.11 and 6.14. In addition, we also reviewed page 72 of the draft report where we discussed the statement “an updated Net Environment Benefit Analysis (NEBA) would be submitted in 2019”. The below provides comments on discussion points for each item.

4.2.6 CEAA Potential Condition:

Controlling lighting required for the operations of the Designated Project for the duration of the drilling program, including the direction, timing, intensity, and glare of light fixtures, while meeting operational health and safety requirements.

Comments/discussion points during the teleconference:

I advised that ExxonMobil’s key concern with respect to lighting is ensuring the safety of personnel and adherence to regulatory requirements. Meghan Murphy indicated that the condition was not meant to be prescriptive and that they would review the wording to provide further clarity.

ExxonMobil’s Comment: Suggested wording for consideration, “4.2.6 Lighting will meet operational health and safety requirements, while considering where appropriate the direction, timing, intensity and glare of the light fixtures.”

6.11 CEAA Potential Condition:

The proponent shall undertake a Net Environmental Benefit Analysis to identify spill response options that will be implemented in the case of a spill to provide for the best opportunities to minimize environmental consequences, and provide it to the Board for review prior to drilling.

Comments/discussion points during the teleconference:

CEAA will review the report and potentially state “NEBA either /or SIMA” are required.

ExxonMobil’s Comment: Suggest the potential condition be updated to state, “The proponent shall undertake a Spill Impact Mitigation Assessment (SIMA) or a Net Environment Benefit Analysis (NEBA) to identify spill response actions that will be implemented in the case of a spill to provide for the best opportunities to minimize environmental consequences, and provide it to the Board for review prior to drilling.”

6.14 CEAA Potential Condition:

The Proponent shall undertake analysis to confirm the capping stack technology selected can be deployed and operated safely at depths less than 500 m.

Comments/discussion point during the teleconference:

ExxonMobil addressed shallow capping technology in its previous Environmental Assessment, CEAA clarified that the analysis does not necessarily need to be new information and that the proponent can build on its prior submission.

ExxonMobil's Comment: Suggest that the potential condition be updated to state “The Proponent will update its previous EA information related to capping stack technology deployment and operation at shallow depths and submit it to the C-NLOPB.”

In addition, we discussed that page 72 should be updated to state; “The proponents in cooperation with several other operators in the Newfoundland and Labrador offshore submitted a net environmental benefit analysis to the C-NLOPB in 2013 to evaluate the suitability of dispersant application to spills of crude oil from production and drilling installations on the Grand Banks, taking into consideration comments from the C-NLOPB, a revised dispersant net environmental benefit analysis would be submitted to the C-NLOPB in 2020.”

Regards,

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