



Noia Submission to the Canadian Environmental Assessment Agency

Re: EIS Summary of the Chevron Canada Exploration Drilling Project in the West Flemish Pass

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The Newfoundland and Labrador Oil and Gas Industries Association (Noia) was founded in 1977 to represent the supply and service sector of the offshore oil and gas industry. Today, Noia represents over 500 member organizations worldwide which are involved in, or benefit from, the oil and gas industry of Newfoundland and Labrador. Noia members are a diverse representation of businesses that range from offshore supply boats and helicopters to health and safety equipment and training, engineering solutions and fabricators to law firms, personnel agencies and golf courses.

Noia is pleased to have the opportunity to comment on the Environmental Impact Statement (EIS) Summary of Chevron Canada Limited (Chevron) for exploratory drilling in exploration licence (EL) 1138, located 375 kilometres northeast of St. John's. Chevron and Anadarko Canada E&P Ltd. each have a 50% interest in the licence area. The EIS summary outlines plans to potentially undertake upwards of eight exploration and delineation/appraisal wells, commencing in 2021. The licence is valid until 2025.

In November 2018, Noia made a submission on the project description and supported the project. That support remains as a result of environmental impact statement summary. Noia previously outlined the socioeconomic impacts of the offshore oil and gas industry and will not repeat that information in this submission. However, as recently indicated by Noia in other submission processes, the association does believe it is important to note that in the intervening period between the project summary comment period in November 2018, and the EIS summary in 2020, a draft regional assessment has been made public. The report of the regional assessment committee highlights specific benefits of exploration drilling, including \$221.7M spent on exploration drilling programs in Newfoundland and Labrador in 2017, generating 3,136 person-months of employment.

Further, the draft regional assessment outlined – as has been indicated in numerous environmental assessment processes – that through decades of experience and standard mitigation processes exploratory drilling programs do not pose significant risk of adverse effects.

Noia agrees that exploration activities have a history of over two decades in the offshore of Newfoundland and Labrador with stringent federal regulations and mitigation practices in place. Further, the role of the C-NLOPB as life-cycle regulator has been effective due to extensive experience and knowledge accumulated over two decades of involvement with the offshore. It is important to note that environmental safety is a core function of the C-NLOPB, which is also a founding member of the International Offshore Petroleum Environmental Regulators (IOPER), a collaborative group of national regulators whose focus is to drive improvements to environmental performance in the global offshore petroleum and exploration industry. During 2016-17, the focus of IOPER was on environment performance indicators, regulating oil spill preparedness and response, as well as public consultation and decision making.

The draft regional assessment also states it is “considered unlikely” that offshore exploratory drilling in the region would “hinder” Canada’s ability to meet its emission targets and fulfill international obligations.

The EIS summary document from Chevron outlines mitigation measures which will be, or have been implemented, for the exploration program. These include the use of remote operated vehicles, spill modelling and spill response plans. Specific mitigations will also be implemented to protect marine life and habitat. As well, Noia is encouraged that the EIS summary outlines a coordinated approach by operators planning exploration programs in the Newfoundland and Labrador offshore to consult with Indigenous groups. Noia supports this approach as it will help inform Indigenous peoples of potential activities and do so in the full context of offshore activities, and also increase their knowledge of the potential projects to occur offshore.

Conclusion

Noia supports an ocean economy where all the ocean industries work together for the socioeconomic benefit of the nation and where activity is undertaken in an environmentally conscious manner. The various industries involved in the ocean economy can co-exist and they can do so in a manner that takes into consideration protection of all ocean resources. This has occurred for decades offshore Newfoundland and Labrador and will certainly continue in the best interest of all Canadians.

Noia also is cognizant of the responsibility of all participants in the ocean economy to practice environmental stewardship, conservation, and protection. There is an onus upon everyone engaged in the offshore oil and gas industry to protect people, marine life and habitat, marine birds and mammals and all wildlife.

The potential of our ocean economy is both staggering and inspiring and we must strive to provide opportunities and support environmental stewardship that is based upon scientific evidence.

Noia submits that the information outlined above should be considered when assessing the proposed drilling project of Chevron in EL 1138 in the West Flemish Pass. Given this information, along with the development of a regional assessment for offshore Newfoundland and Labrador and the impending processes to be implemented for offshore exploration as a result, Noia supports the proposed exploratory drilling program of Chevron.

Sincerely,

<Original signed by>

Charlene Johnson
CEO
Noia