

ANNEX 1: Advice to the Agency

Table 1: Please use the table below to provide advice for the Agency's consideration in its recommendation to the Minister of Environment and Climate Change and preparation of draft conditions

Questions	Responses/Comments
<ul style="list-style-type: none"> Has the proponent described all project components and activities in sufficient detail to understand all relevant project-environment interactions? If not, identify what additional information is needed. 	Additional clarity should be provided on proposed coral and sponge surveys as indicated in comments below.
<ul style="list-style-type: none"> Were the study areas sufficient to predict potential effects from all relevant project-environment interactions, and to consider the effects within a local and regional context? Is the baseline information sufficient to characterize the existing environment, predict potential effects and obtain monitoring objectives? If not, identify what additional information is needed. 	
Alternatives Assessment	
<ul style="list-style-type: none"> Has the proponent adequately described the criteria it used to determine the technically and economically feasible alternative means? Has the proponent listed the potential effects to valued components (VCs) within your mandate that could be affected by the technically and economically feasible alternative means? Has the proponent adequately described why it chose each preferred alternative means? Are there other alternative means that could have been presented? If so, please describe. 	
Environmental Effects Assessment	
<ul style="list-style-type: none"> Has the proponent clearly described all relevant pathways of effects to be taken into account under section 5 of CEAA 2012? Has the proponent identified all potential effects to VCs, including species at risk, within your mandate? Were all potential receptors considered? 	
<ul style="list-style-type: none"> Were the methodologies used by the proponent appropriate to collect baseline data and predict effects, why or why not? Has the proponent explicitly addressed the degree of scientific uncertainty related to the data and methods used within the assessment? If there are unaccounted for scientific uncertainties, describe them and indicate the options for increasing certainty in the predictions? 	Additional information regarding spill modelling for EL 1134 and 1135 should be considered for the Effects Assessment on VCs.

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<ul style="list-style-type: none"> Are the predicted effects described in objective and reasonable terms (e.g. beneficial or adverse, temporary or permanent, reversible or irreversible)? 	
<ul style="list-style-type: none"> Has the proponent adequately assessed the potential cumulative environmental effects, including using appropriate temporal and spatial boundaries , examining physical activities that have been and will be carried out, and proposing mitigation and follow-up program requirements? Provide rationale. 	
<ul style="list-style-type: none"> Has the proponent adequately described the potential for environmental effects caused by accidents and malfunctions, including the types of accidents and malfunctions, their likelihood and severity and the associated potential environmental effects? If not, identify what additional information is needed. 	
<ul style="list-style-type: none"> Are you satisfied with the proponent's assessment of effects of the environment on the Project? Has the proponent characterized the likelihood and severity appropriately? Provide rationale. 	See note below regarding potential effects of accidental events.
<ul style="list-style-type: none"> Has the proponent sufficiently described and characterized the project activities and components as they relate to federal decisions within your mandate? If not, identify what additional information is needed. Are changes to the environment, as they relate to federal decisions within your mandate, sufficiently described? If not, identify what additional information is needed. 	
Mitigation	
<ul style="list-style-type: none"> Has the degree of uncertainty regarding the effectiveness of the proposed mitigation measures been described? If not, identify what information is needed. Is it clear how each proposed mitigation measure links to each potential pathway of effect? 	
<ul style="list-style-type: none"> Would you propose different or additional mitigation measures? If so, provide a description of the mitigation measure(s), with rationale. 	
<ul style="list-style-type: none"> Which of the proposed mitigation measures and/or project design elements do you consider to be necessary to reduce the likelihood of significant adverse environmental effects? Provide rationale. 	
Residual Adverse Environmental Effects	
<ul style="list-style-type: none"> Are the identification and documentation of residual environmental effects described by the proponent adequate? If not, what are the aspects for which there is uncertainty and, where 	

Questions	Responses/Comments
possible, indicate how these residual effects can be best described. If there is uncertainty, what are the options for increasing certainty?	
<ul style="list-style-type: none"> Did the proponent provide a sufficiently precise, ideally quantitative, description of the residual environmental effects related to your mandate? Identify any areas that are insufficient. 	
Determination of Significance	
<ul style="list-style-type: none"> Are the conclusions on significance in the EIS supported by the analysis that is provided? Are the proponent's proposed criteria for assessing significance appropriate? This includes how the criteria were characterized, ranked, and weighted. Provide rationale. Where the proponent has not used one of the Agency's recommended key criteria (magnitude, geographic extent, duration, frequency, reversibility, and social/ecological context), has a rationale been provided? 	
<ul style="list-style-type: none"> Were appropriate methodologies used in developing the conclusions on significance? 	
<ul style="list-style-type: none"> Do you agree with the proponent's analysis and conclusions on significance? Provide rationale. 	
Monitoring and Follow-up	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the predictions of the environmental assessment as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the effects assessment. 	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the effectiveness of proposed mitigations as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the proposed mitigation. 	
<ul style="list-style-type: none"> Is the objective of the follow-up program clear and measurable? Does the follow-up program include sufficient detail, and technical merit, for the Agency to achieve the stated objective through a condition (e.g. sufficient baseline dataset, monitoring plans, acceptable thresholds of change, contingency procedures)? 	
<ul style="list-style-type: none"> Are you aware of any federal or provincial authorizations or regulations that will achieve the same follow-up program objective(s)? If so, how do these achieve the objective(s)? 	
Additional comments, views, advice	
<ul style="list-style-type: none"> Provide any other comments. 	

ANNEX 2: Information requirements directed to the proponent

Table 2: Please use the table below to provide your department's comments and suggestions for information that should be required from the proponent to ensure the information in the EIS is scientifically and technically accurate and is sufficient to make a determination of significance on environmental effects.

ID	Project Effects Link to CEAA 2012	Reference to EIS guidelines	Reference to EIS	Context and Rationale	Specific Question/ Request for Information
C-NLOPB-1	5(1)(a)(i) Fish and Fish Habitat 5(1)(a)(ii) Aquatic Species 5(1)(a)(iii) Migratory Birds	Part 1 – Section 3.1. Designated Project Part 2 – Section 3.1.	Section 2.5.1.	In Section 2.5.1, Equinor describes completing Coral and Sponge surveys in advance of exploration drilling, at least three months prior to drilling activities. However, in Table 2.5, the scheduling provided for Pre-drill coral and sponge surveys overlaps with Regulatory approvals.	Equinor should confirm whether Coral and Sponge surveys are currently being planned prior to EA Approval. Additional information regarding scheduling should be provided. NOTE TO AGENCY: The EIS Guidelines states that surveys potentially required to support the conduct of the EA (e.g. environmental baseline surveys) is not considered part of the Designated Project. Therefore including this scope in the EIS may potentially cause issues regarding future authorization, if the work is planned prior to EA approval (e.g. the Board would not authorize without consultation with IAAC).
C-NLOPB-2	5(1)(a)(i) Fish and Fish Habitat 5(1)(a)(ii) Aquatic Species	Part 2 – Section 3.1.	Section 2.5.5	Equinor states that they expect between eight to ten vessel	Additional clarification should be provided.

	5(1)(a)(iii) Migratory Birds			transits per month to support the Project, which aligns with previous exploration drilling programs and it would not result in an increase over previous levels. It is not clear what the increase in vessel traffic would be with the addition of the Central Ridge Project.	
C-NLOPB-3	5(1)(a)(i) Fish and Fish Habitat 5(1)(a)(ii) Aquatic Species	Part 2 – Section 3.1 Project Components	Table 2.6 and throughout EIS	Equinor provides information on the typical drill mud and cuttings discharge volumes for modelling locations in the Flemish Pass EIS. It is not clear, based on information provided in Figures in the Central Ridge EIS where the 'Eastern Project Area Modelling Location', Flemish Pass South Modelling Location' and 'Jeanne d'Arc Basin Modelling Location' is located, as referenced in this Table. Additionally, reference to many of these areas is included throughout the EIS and should be identified without having to source the information in the Flemish Pass EIS, Eastern Newfoundland EIS or supplemental information.	Please provide a figure with these modelling locations labelled.
C-NLOPB-4		Part 2 – Section 3.1 Project Components	Section 2.5 and Sections 8-13	Section 2.5.1. assumes that 'there may be up to two drilling installations actively engaged in drilling activities in the Project Area (i.e., any of the Flemish Pass ELs). Additionally throughout the effects	Provide clarification on whether scope of simultaneous drilling includes two drill rigs operating throughout the project area on any of the ELs in the Flemish Pass and

				assessment chapters, Equinor states that simultaneous drilling may occur during the Project.	Central Ridge EISs vs two drill rigs operating simultaneously for each project. Additionally clarify whether the later, if applicable has been considered in the effects assessment.
C-NLOPB-5		Part 2 – Content of the Environmental Impact Statement – 6.1.2 Marine Environment	Section 4.5.1 Cuttings Modelling	Although justification is provided on why drill cuttings was not specifically completed for EL 1159 and EL 1160, additional information should be included on the relationship to previous modelling and EIS implications.	Update applicable sections with additional details on the model methods and results from the drill cuttings modelling was that used.
C-NLOPB-6	5(1)(a)(i) Fish and Fish Habitat 5(1)(a)(ii) Aquatic Species 5(1)(a)(iii) Migratory Birds	Part 2 – Section 7.6.1. Effects of potential accidents or malfunctions	Section 15	<p>Equinor provides a summary of the spill modelling results for EL 1134 and 1135, and describes the applicability of this modelling for ELs 1159 and 1160.</p> <p>However, it does not appear that these modelling results are considered when determining potential effects to VCs in Sections 15.5.1 – 15.5.6. In this section, there is a reliance on modelling for the ‘Northern Flemish Pass site’ and ‘Eastern Flemish Pass’, and not also on the models described above.</p> <p>As indicated during conformity review, the outcomes of 1134</p>	Include the outcomes of models conducted for ELs 1134 and 1135 in the effects assessment for the various VCs.

				deep water model are different as to shore line oiling, predicated concentration, thickness and mass balances and should also be considered within the effects assessment.	
C-NLOPB-7		Part 2 – Section 7.6.1. Effects of potential accidents or malfunctions	Section 15.3	Equinor states that the probability of a well blowout is 3×10^{-6} , however does not provide additional information for how that probability is calculated. It is assumed that this information is included in the Flemish Pass EIS, however additional information should be included within the Central Ridge EIS to support this estimate.	Additional information should be provided and referenced for how this probability has been calculated.
C-NLOPB-8	5(1)(a)(i) Fish and Fish Habitat	Part 2 – Section 7.3.1. Fish and Fish Habitat.	Table 17.1 and Section 8.3.7.	Table 17.1 does not include a project interaction between Fish and Fish Habitat and Geological, Geotechnical and Environmental Surveys. Geotechnical surveys may cause potential effects on fish habitat.	Provide additional information on this potential project interaction and how the effects are considered in Section 8.3.7.
C-NLOPB-9		Part 2 – Content of the Environmental Impact Statement – 6.6.1 Effects of Potential accidents or malfunctions	Section 15.3 – Table 15.1 Spill Risk and Probabilities	It states in the EIS that Tables 15.1 to 15.4 provide updated Canada-NL Offshore spill data to the end of 2017.	Table 15.1, has data from 2018 included; text should be updated to reflect this.
C-NLOPB-10		Part 2 – Content of the Environmental	Section 15.4 – Fate and Behavior of	The data provided in Table 15.6 for EL 1134 is not the exact numerical values as used in the	Clarification should be provided on the discrepancy between the

		Impact Statement – 6.6.1 Effects of Potential accidents or malfunctions	Potential Spills Table 15.6 – Summary of Spill Trajectory Modelling	<p>ExxonMobil, 2018 – Eastern Newfoundland Offshore Exploration Drilling Project (2018-2029) - Environmental Impact Statement Addendum: Addition of EL 1134, which include the following:</p> <p>Numerical data for EL 1134; Subsurface Blowout - Southern Flemish Pass EL 1134 a hypothetical release of 6,009 m3/day (37,800 bbl/day) of Ben Nevis crude oil for 30 and 113 days for a total of 180,292 m3 (1,134,000 bbl) and 679,098 m3 (4,271,400 bbl), respectively.</p>	values reported in the Central Ridge EIS and the Eastern Newfoundland Offshore Exploration Drilling Project EIS.
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ANNEX 3: Advice to the proponent

Table 3: Additional advice to the proponent, such as guidance or standard advice related to your departmental mandate

ID	Reference to EIS	Context and Rationale	Advice to the Proponent
C-NLOPB-11	Section 2.9.3.1. Mitigation Measures Summary	<p>In this section and throughout the EIS, Equinor refers to drilling wastes will be disposed of 'in accordance with' the OWTG.</p> <p>Additionally, there are other references to 'adhering' to 'in accordance with' Guidelines.</p>	<p>Guidelines are not statutory instruments. The description of a means or method in the guidelines is not mandatory, unless referencing a Regulatory or Board requirement. The onus is on the operator to comply with the Regulations and to be able to demonstrate the adequacy and effectiveness of the methods employed to achieve compliance.</p>