



Energy NL Submission to the Impact Assessment Agency of Canada
Re: Environmental Impact Statement for the Tilt Cove Exploration Program
(Reference Number 80177)
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Introduction

Energy NL represents approximately 500 member organizations worldwide which are involved in the energy sector. Members are active in all areas of the supply and service sector and include a diverse representation of businesses that range from offshore supply vessels and helicopters, carbon reduction and sustainable technologies, health and safety equipment and training, engineering solutions and fabricators to law firms and human resource agencies.

Energy NL is pleased to once again have the opportunity to comment to the Impact Assessment Agency of Canada (IAAC) on the proposed Suncor Energy (Suncor) Exploration Drilling Project (2019-2028) in the Jeanne d'Arc Basin, specifically in exploration licence 1161. As required by the Impact Assessment Agency of Canada, Suncor has submitted an Environmental Impact Statement (EIS) Summary for the program which proposes to drill up to 12 wells in total. The location for drilling is approximately 300 kilometres from St. John's in the Jeanne d'Arc Basin which has seen numerous exploration drilling programs in the past, along with production facilities. Seven wells have been drilled within the geographic boundaries of EL 1161 between 1973 and 2000. This is the first well in the EL since it has been held by Suncor.

Newfoundland and Labrador Exploration Programs

Energy NL submits that well-known and standard mitigation measures are in place for Newfoundland and Labrador offshore exploratory wells, as well as significant information about the offshore area and, in particular, the Jeanne d'Arc Basin. With the significant information and knowledge available about offshore exploration in the area, while not applicable to this exploration program, a regional assessment process is in place for offshore Newfoundland and Labrador for exploration programs. This denotes that governments, industry, and stakeholders have a comprehensive amount of data available to make informed decisions about the safety and applicability of exploration activities offshore Newfoundland and Labrador.

Further, the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) has decades of experience in reviewing, approving, and monitoring such regulations and has regulatory authority as per the Accord Acts. Exploratory wells are activities of short duration; Suncor estimates the proposed project could take up to 120 days per well. Activity may occur year-round.

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 lifecycle 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.

Program Considerations

Greenhouse Gas Emissions

Oil produced from offshore Newfoundland and Labrador is already a world leader. The natural resource is 30% below the global average for greenhouse gas emissions at extraction, and in 2017, the Newfoundland and Labrador offshore oil and gas industry produced just 0.23% of Canada's greenhouse gas emissions. According to the proponent EIS, the annual GHG emissions for the program could range from 0 to approximately 63 kt CO₂e per year, with 44 kt CO₂e attributed to the drilling unit and the remainder from vessels, helicopters, and flaring. The EIS states the 63 kt CO₂e per year is considered by IAAC to be in the medium category, with Mobile Offshore Drilling Unit (MODU) representing 0% to 0.46 of total reported provincial GHGs for 2020 and 0% to 0.01% of 2020 national emissions.

Environmental Stewardship

Energy NL supports an ocean economy where all 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.

Consultations

As part of the environmental assessment process Suncor was provided a list of organizations, including Indigenous communities, with which it must consult regarding the project. Suncor has conducted such consultations, and in some cases, undertook consultations in conjunction with other companies seeking to conduct offshore exploration projects. The EIS provides a summary of the feedback received as part of the consultation process and the approach of the proponent to address concerns raised.

Mitigations

As part of the project approval process, Suncor has provided significant detail about how the activity would occur and the mitigations to be used. Suncor has also provided details of the Operational Excellence Management System (OEMS) the company uses to ensure safe operations. As well, Suncor has committed to following all environmental expectations of the IAAC and the C-NLOPB.

Mitigation plans are also in place for by-products such as drill cuttings and marine discharges. While there will undoubtedly be effects of the project, they are expected to be localized or transient. Modelling has been undertaken to predict spill trajectories, with comprehensive spill response plans developed in the unlikely occurrence of such an event. A compensation program will also be in place should accidental events have detrimental impacts. The project proponents have also considered decommissioning for when the project reaches end of life stage.

Conclusion

Energy NL 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 EIS for the Tilt Cove exploration program has met this responsibility.

The EIS outlines a commitment to meet legislative and regulatory expectations, conduct environmental effects monitoring, and describes the modelling undertaken to protect marine life and habitat, marine birds and migratory birds, and mammals. Significant modeling has been undertaken to determine potential impacts of both production activities and adverse events, and to implement mitigation measures of the project's affects. Mitigation measures include reduced lighting, protocols for stranded birds, survey and assessment for corals, sponges and sea pens, and appropriate mitigations and measures to accommodate such seabed life for well templates. Specific mitigations will be implemented to protect marine life and habitat.

As previously mentioned, Energy NL 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.

Energy NL 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.

Energy NL submits that the information outlined above should be considered when assessing the proposed Tilt Cove exploration program. Energy NL supports the proposed program and looks forward to the impact it will have upon the offshore oil and gas industry, specifically the supply and service sector, as well as Newfoundland and Labrador.

Sincerely,

<Original signed by>

Charlene Johnson
CEO
Energy NL