

National Energy
Board



Office national
de l'énergie

File OF-EP-GeoOp-M711-5554587 02
CEAR File #: 10-01-53884
8 September 2011

Ms. Darlene Davis
Lead Canadian Consultancy
RPS Energy
1545 Birmingham Street
2nd Floor
Halifax, NS B3J 2J6
Facsimile 902-425-0703

Dear Ms. Davis:

**TGS NOPEC Geophysical Company ASA, Petroleum Geoservices and MultiKlient Invest (TGS/PGS/MKI) NorthEastern Canada 2D Seismic Exploration Survey
National Energy Board Information Request No. 1**

Pursuant to our obligations under the *Canada Oil and Gas Operations Act* and the *Canadian Environmental Assessment Act*, the National Energy Board (the Board) finds that further information is required to complete the environmental review of the **TGS/PGS/MKI NorthEastern Canada 2D Seismic Exploration Survey**.

The following information request refers to TGS/PGS/MKI's *Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada* prepared by RPS Energy (2011), hereafter termed the "Environmental Impact Assessment" except where otherwise noted.

We request that you provide your responses to this Information Request by **7 October 2011** to Susan Measor, Team Leader of Conservation of Resources and to the individuals copied below. If there are any concerns regarding the requested response date please let us know as soon as possible.

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Should you have any questions or require more clarification regarding the attached request for information, please contact Christy Wickenheiser by telephone at 403-299-3869 or by email at christy.wickenheiser@neb-one.gc.ca .

Yours truly,



for
Anne-Marie Erickson
Secretary of the Board

Attachment

- c.c. Ms. Paula C. Smith, Environment Assessment Coordinator, Environment Canada, facsimile 867-975-4645
- Mr. Jerry Ward, CEO, Baffin Fisheries Coalition, facsimile 867-979-3068
- Mr. Harry Earle, General Manager, Arctic Fisheries Alliance, facsimile 867-927-8896
- Ms. Marie Duchaine, Avatiriniq Coordinator, Government of Nunavut, facsimile 867-975-6089
- Mr. Robert J. St. Elois, Qikiqtani Inuit Association, facsimile 867-975-8400
- Ms. Shari Gearheard, PhD, Clyde River, sharig@qiniq.com

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National Energy Board Information Request No. 1

- 1. Reference:** Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada.

Preamble: The National Energy Board has received letters of comment from the following organizations or individuals:

- i. Environment Canada (EC), dated 28 May 2010;
- ii. Baffin Fisheries Coalition, dated 1 June 2011;
- iii. Arctic Fisheries Alliance, dated 9 June 2011;
- iv. Government of Nunavut, dated 10 June 2011;
- v. Qikiqtani Inuit Association, dated 13 June 2011;
- vi. Shari Gearheard, dated 31 May 2011.

Request: Please respond to the comments. If applicable, include in your response justification for not implementing recommendations made in the comments.

- 2. Reference:** Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada.

Preamble: Figure 1 on page 13 in the Environmental Impact Assessment depicts the survey location. The NEB notes that according to the figure some survey lines extend below 61 degrees North into waters regulated by the Canada Newfoundland Offshore Petroleum Board.

Request: Please clarify TGS/PGS/MKI's program area by providing an updated map or location description that clearly indicates the southern extent of the project.

- 3. Reference:** Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada.

Preamble: Section 5.4 "Accidents and Malfunctions" of the Environmental Impact Assessment states, "The vessel carries trained personnel and applies specific protocols to deal with equipment malfunctions that may lead to the spill of toxic materials"; however, specific environmental impacts and mitigation measures relating to accidents and malfunctions are not mentioned.

Request: Please identify what the accidents and malfunctions related to the project may be, their associated impacts, and what mitigation measures may be applied.

4. Reference: Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada.

Preamble: Section 5.2 of the Environmental Impact Assessment describes potential environmental impacts of the proposed project, however impacts to air quality and water quality are not indicated.

Request: Please identify if there may be potential impacts to air quality and water quality as a result of the proposed activity, what these impacts may be and how might they be mitigated.

5. Request:

- i. Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada;
- ii. Letter from TGS/PGS/MKI to the Qikiqtani Inuit Association, dated 12 July 2011;
- iii. Letter from TGS/PGS/MKI to the National Energy Board, dated 29 July 2011.

Preamble: In Section 5.7 of the Environmental Impact Assessment indicates that RPS Energy had intended to return to some communities for public meetings late May 2011. TGS/PGS/MKI have indicated through correspondence with the Qikiqtani Inuit Association and the NEB their intentions to conduct further community engagement.

Request: Please provide an update describing the results of consultation conducted since the submission of the Environmental Impact Assessment and describe consultation plans going forward.

6. Reference: Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Baffin Bay and Davis Strait Offshore Eastern Canada.

Preamble: The Non-Technical Summary of the Environmental Impact Assessment states, "...an Operational Project Plan incorporating the measures specified in the Environmental Protection Plan will be implemented to ensure operations are completed in full compliance of the company's stated environmental aims and objectives."

Request: Please provide a copy of the Operational Project Plan, the Environmental Protection Plan and the plans requested in the letter of comment to the NEB from Environment Canada dated 28 May 2010 including:

- The Ballast Water Management Plan
- Waste Management Plan
- Survey Acquisition Plan; and
- Spill Contingency Plan