



Impact Assessment  
Agency of Canada

Suite 200  
1801 Hollis Street  
Halifax NS B3J 3N4

Agence d'évaluation  
d'impact du Canada

Bureau 200  
1801, rue Hollis  
Halifax, NE B3J 3N4

October 15, 2019

**Sent by E-mail**

Steve Edwards  
SSHE and External Affairs Manager  
ExxonMobil Canada Ltd.  
Suite 1000, 100 New Gower Street  
St. John's, NL  
Canada, A1C 6K3

Gareth Igloliorte  
Husky Oil Operations Ltd.  
351 Water Street  
St. John's, NL  
Canada, A1C 1C2

**RE: Information Requirements for Inclusion of ExxonMobil Canada Ltd in the Environmental Assessment of the Husky Energy Exploration Drilling Project (Registry 80130)**

Dear Mr. Edwards and Mr. Igloliorte,

Further to the letter dated September 18, 2019, in which Mr. Edwards describes ExxonMobil Canada Ltd.'s (ExxonMobil) acquisition of a portion of exploration licence (EL) 1151 (now known as 1151A) from Husky Oil Operations Ltd. (Husky), the Impact Assessment Agency of Canada (the Agency) requires confirmation on items outlined below.

ExxonMobil confirmed that the equipment, technology and activities it intends to employ in EL 1151A are substantially similar as those indicated in Husky's Environmental Impacts Statement (EIS), and that it generally supports the effects assessments. ExxonMobil stated that with respect to mitigations, monitoring and follow-up as it pertains to EL 1151A, it takes no exception to the information provided by Husky. ExxonMobil also stated that the number of wells and location outlined within Husky's EIS are generally consistent with ExxonMobil's drilling plan for EL 1151A.

The Agency will continue to prepare the draft Environmental Assessment Report for the Husky Energy Exploration Drilling Project reflecting two proponents, Husky and ExxonMobil. The Project would be located within ELs 1151A, 1151B, 1152, and 1155. To ensure that the Agency has the necessary information to complete the draft Environmental Assessment Report for the Project, please confirm the following:



Issue	Information Required
Project Name	Confirm whether “Husky Energy Exploration Drilling Project” remains the project name. If not, please provide the updated name.
Information Requirements	<p>Confirm that all information requirements and responses submitted by Husky have been reviewed and that ExxonMobil is in agreement. These include:</p> <ul style="list-style-type: none"> <li>- Responses to Information Requests Related to the Environmental Impact Statement, Round I: <a href="https://iaac-aeic.gc.ca/050/evaluations/document/128091">https://iaac-aeic.gc.ca/050/evaluations/document/128091</a></li> <li>- Revised Responses to Information Requests Related to the Environmental Impact Statement, Round I: <a href="https://iaac-aeic.gc.ca/050/evaluations/document/130769">https://iaac-aeic.gc.ca/050/evaluations/document/130769</a></li> <li>- Responses to Information Requests Related to the Environmental Impact Statement, Round II: <a href="https://iaac-aeic.gc.ca/050/evaluations/document/132163">https://iaac-aeic.gc.ca/050/evaluations/document/132163</a></li> </ul>
Mitigation and Follow-up	Confirm the attached “Summary of Proponents’ Proposed Mitigation Measures and Follow Up” (Attachment 1).
Number of Wells	<p>“The Project would include the drilling, testing, and abandonment or suspension of up to ten offshore wells within exploration licences 1151A, 1151 B, 1152 and 1155, as well as other associated incidental activities.”</p> <p>Confirm that the Project would include up to ten wells to be drilled between the two operators.</p>
Simultaneous Drilling	<p>Husky indicated that it is not planning to conduct simultaneous drilling within any one exploration licence and it is unlikely that simultaneous drilling between exploration licences within the Project will occur.</p> <p>Confirm this remains the case. If not, discuss the potential for simultaneous drilling (likelihood, circumstances in which it would occur, minimum distance between drilling locations, etc), and the applicability of environmental effects predictions in the EIS and any updated mitigation measures and follow-up.</p>
Figures	Update the attached figures (Attachment 2) reflecting the boundaries of EL 1151A and 1151B.
Length of Time to Drill a Well	<p>“Based on historical operation data in the region, it is expected that each well would require up to approximately 80 days to drill to a total vertical depth.”</p> <p>Confirm this remains the case.</p>
Engagement with Indigenous Groups	Husky engaged with a total of 41 Indigenous groups located in Newfoundland and Labrador, Nova Scotia, New Brunswick, Prince Edward Island and Quebec over the Project. Early engagement began in June 2016 with the Nunatsiavut Government, the Labrador Innu Nation, the NunatuKavut Community Council, Qalipu Mi’kmaq Nation Band and Miawpukek First Nation. Engagement methods included phone calls, emails and reports. In July 2017, following the Agency’s expansion of consultation

	<p>to include additional Indigenous communities located in Nova Scotia, New Brunswick, Prince Edward Island, and Quebec, Husky sent similar correspondence and Project overview information to the additional Indigenous groups in the Maritime Provinces and Quebec.</p> <p>Confirm whether ExxonMobil has engaged with Indigenous groups; if not, indicate how and when this will occur.</p>
Engagement with Stakeholders	<p>Husky engaged with groups representing various stakeholders that have historically been engaged in or have an interest in offshore oil and gas operations in Newfoundland and Labrador. This included representatives from the oil and gas industry, fishing industry, environmental non-government organizations and other oil and gas operators participating in exploration or production activities in offshore Newfoundland and Labrador. Husky has conducted engagement efforts, used a variety of engagement methods including face-to-face meetings, telephone conversations, and written correspondence, for the EIS since March 2016, and will continue to meet with various stakeholders to provide information the project and solicit feedback.</p> <p>Confirm whether ExxonMobil has engaged with stakeholders; if not, indicate how and when this will occur.</p>
Atlantic Salmon Research	<p>Husky has deployed acoustic receivers contributing to Atlantic Salmon and American Eel research. Confirm if ExxonMobil has been, or will, undertake or contribute to any such Atlantic Salmon or American Eel research.</p>
Special Areas with the Zone of Influence of Routine Project Activities	<p>Confirm the overlap with or distance to 1151A and 1151B (as applicable) to the special areas in the attached Table 1 of Attachment 2.</p>
Special Areas	<p>Provide the percent overlap of EL 1151A and 1151B (as applicable) with the Northeast Slope (3L) Ecologically and Biologically Significant Area, to allow the Agency to complete the statement “X percent of EL 1151A and 1151B (as applicable) overlaps with the Northeast Slope (3L) EBSA”.</p> <p>Provide the percent of the Northeast Slope (3L) Ecologically and Biologically Significant Area that is covered by EL 1151 A and 1151B (as applicable), to allow the Agency to complete the statement “X percent of the Northeast Slope (3L) Ecologically and Biologically Significant Area is covered by EL 1151A and 1151B (as applicable)”.</p>
Special Areas	<p>Confirm if the Northeast Slope (3L) Ecologically and Biologically Significant Area is located within EL 1151A, EL 1151B, or in both.</p>
Proposed Critical Habitat	<p>Confirm if the overlap of proposed critical habitat for Northern and Spotted Wolffish overlaps with EL 1151A or 1151B or both, and provide the percent of overlap with applicable ELs.</p>
Fate and Behaviour of	<p>Provide the distances from the release point in the White Rose oil and gas field models to the centre of EL 1151A and EL 1151B</p>

Subsea and Surface Crude Blowouts	
Well Capping and Containment	<p>Husky provided the details of the mobilization and deployment of a capping stack in response to an accident or malfunction. Details provided related to the location of the capping stack, the estimated mobilization and deployment time, and the potential use of and availability of a capping stack that could be transported by air.</p> <p>ExxonMobil, provide the equivalent details related to the use, mobilization and transport of a capping stack.</p>
Spill Response	<p>Husky stated that for certain scenarios it would utilize spill response equipment located on the Sea Rose Floating Production Storage and Offloading platform.</p> <p>ExxonMobil, for spills of an equivalent nature, confirm if the response equipment located on the Sea Rose Floating Production Storage and Offloading platform would be utilized. If not, confirm its location.</p>
Spill Response	<p>Confirm that ExxonMobil has contractual agreements with private response organizations and other operators that can provide support in responding to an accident.</p>
Spill Response	<p>Husky indicated that a Wildlife Response Plan has been developed and has been submitted to the Canada-Newfoundland and Labrador Offshore Petroleum Board.</p> <p>ExxonMobil/Husky, confirm if a separate Wildlife Response Plan would be developed by ExxonMobil, or if the noted Husky plan would be adopted by ExxonMobil.</p>
Spill Response	<p>Husky indicated that in cooperation with several other operators in the Newfoundland and Labrador offshore, a net environmental benefits analysis was submitted to the C-NLOPB in 2013 to evaluate the suitability of dispersant application as a spill response for operations on the Grand Banks. Based on C-NLOPB comments, a revised dispersants net environmental benefits analysis was to be submitted to the C-NLOPB in 2019.</p> <p>ExxonMobil, confirm involvement in the 2013 net environmental benefits analysis and the subsequent 2019 revision. If not, provide information on ExxonMobil's proposed net environmental benefit analysis.</p>
Cumulative Effects Assessment	<p>Provide the distance from EL 1151A and 1151B to the projects in Table 2 of Attachment 2.</p>

The federal timeline within which the Minister of Environment and Climate Change's decision must be made will be paused. Once responses to the information requirements in this letter are received, and the Agency determines that the information provided is complete, the timeline for the environmental assessment will resume the following day. For further information,

please consult the Agency document on Information Requests and Timelines:  
<https://www.canada.ca/en/environmental-assessment-agency/news/media-room/media-room-2016/information-requests-timelines.html>.

This letter will be posted on the Canadian Impact Assessment Registry Internet site,  
<https://ceaa-acee.gc.ca/050/evaluations/Index?culture=en-CA> .

Please let me know if you have any questions.

Sincerely,

<Original signed by>

Mike Atkinson  
Regional Director – Atlantic  
Impact Assessment Agency of Canada

Cc: Elizabeth Young, Canada - Newfoundland Labrador Offshore Petroleum Board  
Darren Hicks, Canada-Newfoundland and Labrador Offshore Petroleum Board  
Catherine Andrews, Fisheries and Oceans Canada  
Jerry Pulchan, Environment and Climate Change Canada  
Sara Rumbolt, Health Canada  
Jason Flanagan, Transport Canada  
Maximilien Genest, Natural Resources Canada  
Carla Stevens, Major Projects Management Office  
Carol Lee Griffin, Department National Defence  
Vanessa Rodrigues, Parks Canada  
Clare Bustin, Crown-Indigenous Relations and Northern Affairs Canada  
Rhiannon Davies, ExxonMobil Canada Limited  
Sharon Hiscock, Exxon Mobil Canada Limited  
Steve Bettles, Husky Oil Operations Limited