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October 30th, 2013

Received via email
November 1, 2013
at 3:00pm

EIS Coordinator
Environmental Impact Screening Committee
Joint Secretariat, Inuvialuit Settlement Region
Inuvialuit Corporate Centre, Suite 204, 107 Mackenzie Road
PO Box 2120
Inuvik, Northwest Territories, Canada X0E 0T0

Via E-Mail: eisc@jointsec.nt.ca

Dear EIS Coordinator,

Re: Beaufort Sea Exploration Joint Venture Drilling Program

Imperial Oil Resources Ventures Limited (Imperial) has submitted a Project Description to the Environmental Impact Screening Committee (EISC) on behalf of the Beaufort Sea Exploration Joint Venture, a partnership among Imperial, ExxonMobil Canada Ltd. and BP Exploration Operating Company Limited. The proposed development, described as the Beaufort Sea Exploration Joint Venture Drilling Program, is to drill exploration wells in EL 476, known as Ajurak, and EL 477, known as Pokak.

The Inuvialuit Final Agreement (IFA) [s 11(12) d] requires proponents of projects subject to screening by the Environmental Impact Screening Committee (EISC) to provide “*information and technical data in sufficient detail to permit an adequate preliminary assessment of the project and its environmental impact.*” We understand that if the EISC deems the information suitable for a preliminary assessment it must determine if the development could have a significant negative impact, requiring a detailed assessment and review.

The Proponent has acknowledged that a major oil spill would have a significant residual effect on waterfowl and traditional land and resource use (Table 14-20, p 14-108). As such, we urge the EISC to accept the possibility that the proposed development could have a significant negative environmental impact [s 11(17) & s 12(3) a] and could have a significant negative impact on future wildlife harvesting [s 13(7)]. With regard to the criteria established under EISC Guidelines (p 17), we submit that the magnitude, scale, ecological context, nature and irreversibility of potential environmental effects of a potential subsea blowout clearly warrants a more detailed review.

Therefore, we urge the EISC to refer the proposed development to a full assessment and review by the Environmental Impacts Review Board (EIRB) under the terms of the Inuvialuit Final Agreement.

Furthermore, in preparation for a full review of the project (by the EIRB and the National Energy Board, in whatever joint or separate processes are ultimately deemed to be appropriate), we encourage the EISC to provide some guidance to the Proponent in order to enable a more informed and thoughtful review.

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The project description as submitted to the EISC is general and conceptual, and lacking key information needed for a thorough assessment of the potential impacts. Many important matters have either not been decided or are simply not disclosed at this time. To choose just a few examples from many:

- *The proposed ... program consists of drilling one or more exploration wells (p 4-1)*
- *Procedures will be developed to prevent a single point of failure leading to a catastrophic event (p 6-14)*
- *Imperial will develop a plan for SSRW equivalency for submission to the NEB (p 6-3)*

There is a lack of clarity about what the Proponent actually proposes to do (scope of the project, number of wells, depth and location etc); how it proposes to minimize the chances of an oil spill (technologies, operating procedures, validating evidence etc); and what measures it could effectively implement in the event of a spill or blowout (SSRW equivalency proposal, oil spill countermeasures in light of response gaps, etc). Specific details regarding the location of the proposed wells are necessary to conduct an adequate spill trajectory for worst case scenario and liability determinations, as required under section 13 of the IFA. A full Environmental Impact Statement will have to address all of these matters in detail.

This is a precedent-setting proposal, since it is the first to come forward under the National Energy Board's new Filing Requirements for Offshore Drilling in the Canadian Arctic. Among other important matters, this proposal will test the implementation of the NEB requirement that proponents "*meet or exceed the SSRW (Same Season Relief Well) policy of minimizing harm to the environment.*" Furthermore, the Proponent is seeking authorization to drill in deeper water than has been previously attempted anywhere in Arctic waters. The EISC can make an important contribution to this internationally precedent-setting review by providing guidance to the Proponent to ensure that its EIS will contain the detail necessary for a thorough review of this important project.

If you have any further questions about this request please don't hesitate to contact me at 613-232-2510, or mvonmirbach@wwfcanada.org. Our mailing address for matters pertaining to this 30 Metcalfe Street, 4th floor, Ottawa ON K1P-5L4 until November 30, 2013, after which it will be 275 Slater Street, Suite 810, Ottawa ON K1P-5H9.

Sincerely,

Martin von Mirbach
Director, Arctic Program

Cc: Rob Powell, WWF
Will Amos, Ecojustice
Karen Campbell, Ecojustice