

Til

Råstofdirektoratet (BMP)

On CAIRN Energy's Environmental Impact Assessment (EIA), Exploration Drilling Programme, Sigguk Block, Disko West, Greenland.

In the EIA, CAIRN energy states the procedure of the exploration drilling this summer in the *Sigguk Block* of the west coast of Greenland, and possible environmental effects of the exploration.

On the EIA the following comments must be put forward.

The guideline for the EIA has been prepared by the Bureau of Minerals and Petroleum (BMP). In the guideline a significant issue is that the EIA must contain aspects on oil pollution in neighbouring countries. The EIA prepared by Environmental Research Management (ERM) for CAIRN energy, does not contain any consideration on how CAIRN propose the handle oil pollution from the rig, though the main current in the region is from Greenland towards Canada / Nunavut.

Furthermore the guideline also holds that the EIA must contain aspects on decommissioning of the activities. The aspects on decommissioning in EIA are very limited, and do not in full detail how the exploration will be terminated with minimum impact on the environment.

Though the guideline explains how to obtain information to prepare an EIA there are steps of misinformation in the guideline. Hence, it is not possible to gain access to the 'Environmental Oil Spill Sensitivity Atlas for the West Greenland (68° - 72° N) Coastal Zone'.

In the Non-Technical summary it is stated that the present EIA is only for the first two wells. Throughout the EIA, CAIRN / ERM operates with a minimum of four wells. It is explained that CAIRN will have to file an application to BMP to obtain permission to additional wells above the initial two. If that is the case, an additional EIA must be submitted, covering the extra two drillings/wells.

It is also stated that '*at the end of the drilling programme the used muds will be discharged to the sea*'. This is highly problematic as they will contain substances such as bentonite. "*Bentonite can be highly polluting to water if it is released into the environment*" (www.environment-agency.gov.uk)

It is highly problematic that the current EIA does not state how the exploration in 2010 will mitigate for its CO₂ emissions. It is estimated that the operations alone will lead to an emission of 95,108 tonnes of greenhouse gasses; CO₂ and CH₄. At the public meeting in Ilulissat, the message from ERM representative was that the estimated emission of 95,108 tonnes of greenhouse gasses is not a problem. This might be so in relation to other countries or in other of CAIRN's activities. However, seen from a Greenlandic perspective the emission of 95,108 tonnes of greenhouse gasses amounts

to an increase of around 8% in the country's total greenhouse gas emissions. This is not in congruence with international set goals under UNFCCC of reducing impacts from greenhouse gasses.

Additionally there is a 6 % risk of flaring, which will further contribute to the volume of greenhouse gasses emitted to the atmosphere.

Though the EIA states that United Nations Framework Convention on Climate Change (UNFCCC) is applicable to both the EIA and the SIA, there has not been any taken any steps as to purchase CO₂ – certificates, even though CAIRN has committed itself to “...mitigate any impact, remediate any damage and where necessary, offset the impacts.” (page 7 - 3). It is possible to avoid a negative impact on the environment from emissions of greenhouse gasses through a purchase of CO₂ certificates, equivalent to the amount emitted from the exploration.

Greenland/the Arctic are among the most vulnerable countries/regions on the planet, facing climate change. If Greenland itself and the companies operating in the country are not in the frontline on how to avoid climate change, sympathy from the rest of the world will most likely fade.

On the issue of a potential oil spill, and its impact on the environment, the evaluation of the significance of the impact lies with the ‘IA team’ – is this team employed by CAIRN, or is it independent from any interests other than the environment?

The EIA states what methods and materials to be utilised during the exploration this autumn. However, in section 5.13.1 ‘alternatives’, the only alternative to be discussed is the *no development option*. Though the explanation holds that a ‘no drilling choice’ will prevent potential impacts from drilling activities, it also states that the environment ‘will continue to be altered by other factors’. This last statement inhibits an opinion that oil exploration – with all its potential impacts – is not that different from a naturally occurring change. This stand signals indifference towards the pristine environment.

In section 6.3.7 *discharges to sea*, page 6-17, the term ‘BOD’ is used. However’ in text there is no explanation of the abbreviation.

On page 6-20 it is pointed that ‘*The overall impact of drilling muds discharged to the water column will be of minor significance. Harm to pelagic species is unlikely and has not previously been demonstrated.*’ The source given is a paper prepared for Petroleum Environmental research Forum and American Petroleum Institute. Both are on this issue incompetent. None can be said to present objective data.