



## **Energy NL Submission**

### **Canada-Newfoundland and Labrador Offshore Petroleum Board Public Consultation Development Plan Amendment Application for the Use of Stand-Alone Subsea Trees (SA XMT) in the White Rose and North Amethyst Fields**

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#### **Introduction**

Energy NL was founded in 1977 to represent the supply and service sector of the energy industry. Today Energy NL represents over 500 member organizations worldwide which are involved in, or benefit from, the energy industry of Newfoundland and Labrador. Energy NL members are a diverse representation of businesses involved in a range of activities related to both renewable and non-renewable energy development, construction, and operations. This includes, but is not limited to, areas such as direct offshore and onshore supply, health and safety equipment and training, engineering solutions and fabricators, law firms, and human resource agencies.

Energy NL is pleased to have an opportunity to comment on the Development Plan Amendment for the Use of Stand-Alone Subsea Trees in the White Rose and North Amethyst Fields and support the proposal of Cenovus Energy.

#### **General Comments**

Energy NL believes the offshore oil and gas sector must continually innovate to enhance safety for employees, reduce the risk of environmental impacts, lower greenhouse gas emissions, and provide lower carbon energy to meet global demand. Without a drive to innovate, the Newfoundland and Labrador offshore oil and gas sector would not have been as successful as it has been for over four decades.

Cenovus Energy is proposing an innovation in subsea production through the introduction of Stand-Alone Subsea Trees, commonly referred to as Stand-Alone Christmas Trees, to the Newfoundland and Labrador offshore. This equipment may be used in lieu of excavated drill centres (EDCs) to protect against iceberg scour. According to the development plan amendment, the new technology will include an additional set of downhole barriers to maintain wellbore isolation in the event of contact with an iceberg.

Studies indicate the proposed Stand-Alone Christmas Trees will provide environmental protection equivalent to EDCs, while also providing production advantages in the offshore. This is progress for the offshore which should be embraced and encouraged throughout the sector as we look to include new technologies and enhancing our ability to provide lower carbon energy to the world. Employing this new technology may lead to scalable development that can be used for single to multi-well developments, thus opening enhanced opportunity for development, while also allowing for better well placement and assessment of smaller resource pools and improved resource conservation. All these potential results are beneficial for the sector.

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**Conclusion**

Energy NL is supportive of the Stand-Alone Christmas Tree Development Plan Amendment proposed by Cenovus Energy. While a new concept for offshore Newfoundland and Labrador, this approach stands to have many benefits including for safety, the environment, and enhanced production. Energy NL believes it is important for the amendment to be approved and for evaluation of possible use to be further considered by both Cenovus Energy and the Canada-Newfoundland and Labrador Offshore Petroleum Board.