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Lands and Natural Resources

February 22, 2011

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Re: Comments on the Addendum to the Environmental Assessment for the proposed Chevron Canada Resources Labrador Shelf seismic survey program

Dear Mr. Hicks,

Please find below our comments with respect to the addendum to the environmental assessment of Chevron's Offshore Labrador Seismic Program, 2010-2017.

During the summer of 2010, seismic survey operations took place along the coast of Labrador during the same time that the Aboriginal fishery was taking place. There were several local observations (related to crab and shrimp) that catch per unit effort decreased sharply after the seismic survey vessel went through various areas that were being fished, therefore compromising the ability of certain fishing operators to maximize their catch. This was based on fishing taking place just prior to the seismic vessel entering the area and just subsequent to the vessel leaving the area. This indicates significant impacts of seismic survey operations on the Aboriginal fishery.

The chief means of mitigating potential effects on fisheries activities is to avoid active fishing areas, including but not limited to, fixed gear zones when they are occupied by harvesters. To help mitigate significant impacts on the Aboriginal fishery, the seismic program along the Labrador coast should begin no earlier than October 1 each year.

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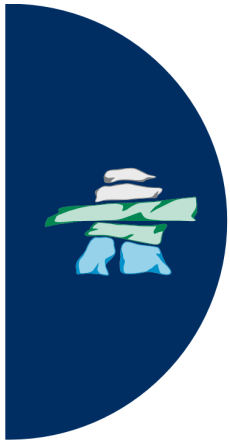
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In addition, given the high degree of uncertainty and unknowns with respect to the determination of the possibility of significant effects, we are requesting a follow-up monitoring program to make informed and up to date decisions with respect to the seismic program. Although the EA is for a period of 2010-2017, it is important that the conclusions and uncertainties of the EA be re-visited several times during this period. With the high amount of uncertainty and unknowns with respect to the impacts of seismic surveys, new information will undoubtedly emerge that will be critical to decision-making going forward.

Best regards,

Tom

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