

THE NATURAL HISTORY SOCIETY OF NEWFOUNDLAND AND LABRADOR

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March 28, 2011

Canada-Newfoundland Offshore Petroleum Board
St. John's, NL

Dear Sirs:

Please find enclosed reviews of the Old Harry Scoping Document prepared by Len Zedel of the Natural History Society of Newfoundland and Labrador and D.H. Steele, of the Canadian Parks and Wilderness Society – Newfoundland.



D.H. Steele
President,
CPAWS, NL



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Canada-Newfoundland & Labrador Offshore
Petroleum Board

Review of Corridor Resources Inc. Scoping Document

Old Harry Prospect – EL 1105 – Exploration Drilling Program – 2012-2014

These are preliminary comments, abbreviated by time constraints. More detailed comments could be provided. Since drilling is not proposed until 2012- 2014 more time should be allowed for the necessary reviews.

1. AS PRESENTED THIS SCOPING DOCUMENT IS INADEQUATE AND SHOULD NOT BE USED AS A BASIS FOR PROVIDING APPROVAL FOR THE PROPOSED EXPLORATION DRILLING PROGRAM.

a. No map of the Old Harry Prospect is provided (Corridor Resources has maps)

b. Since the Project Description was received on February 21 and the Scoping Document released on February 25 it would appear the latter was simply taken off the shelf without any reference to the significant environmental conditions found in the Gulf of St. Lawrence, but does include references to icebergs, sea turtles and deep sea corals, none of which are prevalent in the Gulf.

How was the public involved in drafting this scoping document (par. 3)? Most of the information CPAWS-NL has received has come from CPAWS-Quebec and residents of the Magdalen Islands.

c. This project lists only a single exploration well. However, if significant quantities of oil are discovered, how would it be extracted (no. of wells, geographic area,)?

What is the estimated life span of the extraction, if oil is discovered?. The U.S. National Academy of Science has estimated on average 1% will be lost off shore so the cumulative effects in a relatively small body of water could be significant.

2. The boundary with Quebec has not been accepted by Newfoundland, but apparently it will cut through the Old Harry structure. Approval on the Quebec side will have to be given by the Quebec/National Energy Board. Also, since the movement of surface water out of the Gulf is on the west side of Cabot Strait, the Canada-Nova Scotia Offshore Petroleum Board would have a great interest in the proposal.

A JOINT, COORDINATED ENVIRONMENTAL ASSESSMENT MUST BE PERFORMED THAT COVERS THE WHOLE AREA. THERE SHOULD NOT BE SEPARATE ASSESSMENTS ON DIFFERENT SIDES OF POLITICAL BOUNDARIES

2. Environment

The Gulf of St. Lawrence is a relatively small body of water, with complicated hydrography. It is basically an estuary with two distinct layers (3 in the summer). Relatively warm slope water enters along the Laurentian Channel. Chilling in the winter forms the Cold Intermediate Layer above, that persists year round. In the summer the surface water is heated, especially in the Magdalen shallows. The large St. Lawrence River enters the Gulf in the northwest in the St. Lawrence Estuary proper. The Gaspé Current carries surface water into the southern gulf and around Cape Breton to the eastern Nova Scotia banks. These surface currents which presumably traverse Old Harry carry phytoplankton, fish eggs and larvae and it has been postulated that variations in drift are responsible for variations in recruitment of commercial species such as lobsters five or six years later. Estimates of primary production by plankton indicate the Gulf produces up to 54 million tones of carbon each year, a value which is considered high relative to comparable areas.

3. Fauna and Fauna

Having worked in the Gulf of St. Lawrence for almost 10 years I am well aware that the deep warm water of the Laurentian Channel contain many species (small fish, invertebrates (anemones, sponges and crustaceans) that are poorly known but unique in Canada. waters. At the same time the Cold Intermediate Layer a few meters above can be inhabited by cold water species with Arctic affinities. The Gulf of St. Lawrence is the most southerly region in the northern hemisphere in which sea ice forms to any extent. Associated with the sea ice is a patch of breeding Harp Seals.

In addition this project is surrounded closely by land and even a small spill would soon reach shore where it would impact commercial shellfish and marine plants. It is well within the foraging range of seabirds such as the Gannets nesting on Bird Rock.

4. Black Swan Events, Safety and the Environment

Experience has now shown that relying on the statistics relating to the infrequency of oil spills for planning is useless. Planning must be based on worst case events, which usually have catastrophic effects. The precautionary principle must be applied.

The most recent explanation for the failure of the Blow Out Preventer in the Gulf of Mexico spill is a failure in design and inadequate testing. Most worrisome is the suggestion that today's drill rigs have the same blowout preventers in use. These have been designed and tested to the same inadequate industry standards. Of these, the U.S. Management Service found only 3 of 14 offshore rigs tested were able to shear drilling pipe. Will the drill rig to be used have blowout preventers designed to meet new more rigorous standards?

If there was a blowout (Black Swan Event), how long before a relief well could be drilled, if a blowout preventer failed?



D.H. Steele
President

Canadian Parks and Wilderness Society -Newfoundland

Review of the Old Harry Scoping document (Gulf of St. Lawrence)

I think this is somewhat of an interesting proposal in that the is centered in the Laurentian Channel and I would expect some interesting physical oceanography and biology in that area.

The document is pretty standard and identifies all of the issues that I would normally look for in such a scoping document. Attention has been paid to standard concerns (lights, timing). Only a few comments come to mind:

i) The document makes reference explicitly to "accidental" oil spills and the impact on birds (section 5.2.2), I would like that extended to include "operational" discharges mentioned in section 5.2.10.

ii) Section 5.1 refers to the scheduling of physical activities in relation to sensitive life cycle phases (for VEC's?). Recognition that timing could be an enormously effective mitigation tool is nice, I'd like to see that followed up with some commitment.

iii) With regards to Marine Use (section 5.2.8) indicates the Noise and Acoustic environment will be described. I believe that this should explicitly include an estimate of the zone over which noise levels will be elevated above normally occurring sound levels.

iv) the project includes consideration of associated support craft (3.2). It should be clear that this consideration extends to the corridors that will be taken by any support ships or aircraft.

Len. Zedel
Natural History Society of Newfoundland and Labrador