

March 15 2011

To whom it may concern,

I am writing on behalf of the Mingan Island Cetacean Study (MICS), a marine mammal research and conservation group based in Longue-Pointe-de-Mingan, Qc. MICS has been conducting field studies on humpback whales in the Gulf of St Lawrence (GSL) since 30 years and has largely contributed to the listing of blue whales as endangered under the Species At Risk Act (SARA).

I would like to comment on the draft scoping document regarding the drilling of an exploratory well at the Old Harry prospect by Corridor Resources. Here are some factors that I would like to see been addressed in the Environmental Assessment:

1. Semi-enclosed nature of the Gulf of St. Lawrence

The GSL is a semi-enclosed sea. In the event of a blowout during drilling or well testing operations, the prevailing circulation patterns could lead to a rapid dispersal of hydrocarbons throughout this biologically rich environment. Limited flushing could result in lasting effects of an oil spill and impact the entire food chain and the industries relying on it. The Laurentian Channel, where the project will be conducted, appears to be at the source of some of the krill aggregating in the GSL estuary which sustains large concentrations of marine mammals. Compromising this area could thus affect marine mammals and fisheries well beyond the project area.

These are highly significant potential effects of the project and they deserve serious consideration. I expect that Corridor Resources will provide a mitigation plan that considers the worst- case scenario (in particular in light of the recent oil spill in the Gulf of Mexico) and demonstrate it has the resources and experience to put this plan in application would the worst-case scenario occur.

2. Uncertainty regarding the presence of marine mammals in the project area

Despite the paucity of information regarding the occurrence and abundance of marine mammals in the project area, the existing data suggest that this area is frequently used by marine mammals. Aerial surveys conducted in 1995 and 1996 (described in Kingsley and Reeves, 1998) and the Canadian component of the recent (2007) TNASS surveys all reported sightings in the vicinity of the project area. In addition, the area lies in the main migration corridor of many species of marine mammals, including the endangered blue whale. In my opinion a precise and meaningful assessment of effects cannot be performed without at least some basic knowledge of the occurrence of marine mammals in the area. This should at the very least be acknowledged. It is even truer considering that Corridor Resources requests the right to operate at any time of the year and that seasonal differences in the occurrence of marine mammals in the project area can be expected.

A technically and economically feasible remedy to the lack of information on the occurrence of marine mammals near the Old Harry prospect would be to deploy 1-2 passive acoustic recorders prior to the beginning of drilling operations and during the anticipated months of operations (or for one year by default) to evaluate which species can be expected in the project area. This measure does not seem unreasonable to ask a company who claims to be committed to environmental excellence. Additionally, it could help select a period of operation that would minimize effects to marine mammals.

3. Effects of drilling noise on marine mammals

Considering the bathymetry of the project area, one can expect relatively long-range propagation of drilling noises. The potential behavioural effects of these sounds should be considered not just for the project area, but for the area over which sound levels could potentially disturb marine mammals. An estimation of the size of this area could be easily performed via sound propagation modeling and would once again allow for a much better impact assessment.

4. Effects of airgun sounds associated with vertical seismic profiling on marine mammals.

The concerns and recommendations formulated above for the effects of drilling noise apply here as well. However, considering the different nature of the sounds generated by both activities, their effects should be evaluated separately. Airgun sounds associated with vertical seismic profiling have the potential to propagate over a much larger area and be more disturbing to marine mammals than drilling sounds. A number of species likely to be present in the project area (e.g. fin and blue whales) have been shown to be displaced by, and to alter their vocal behaviour in presence of, airgun sounds, even at relatively low levels. This should be carefully considered when selecting the period of operation.

5. Monitoring during drilling

Considering the likelihood that endangered blue whales will be present at some point or another during the drilling operations, I would like to see a passive acoustic monitoring program (preferably real-time, which can be easily implemented in the case of the a stationary platform as a drill rig/ship) included in the mitigation plan. This would be extremely valuable to evaluate the impacts of drilling operations and sounds on blue whales and other marine mammals in the area (especially at night and in low visibility conditions).

I appreciate the opportunity to provide comments on this document.

Sincerely,

Julien Delarue

Mingan Island Cetacean Study
285, rue Green
St-Lambert, QC, J4P 1T3
[REDACTED]