

Citizen comments on
the Draft Scoping Document for the Environmental Assessment
of Corridor Resources Inc's Exploration Drilling Project – EL 1105

Submitted to

Public Comments – Old Harry Project
Canada-Newfoundland and Labrador Offshore Petroleum Board
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March 26th 2011

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To whomever it may concern,

Having no expertise in the technical aspects of offshore gas/oil exploration, we will not comment on that aspect of the project. While we do believe that, technically, a project of this nature may be well planned-out and implemented, technical prowess has never been a guarantee for equity, justice or success of any human endeavor. There is, however, a number of “common sense” problems involved with the governance and risk evaluation of this project we would like to discuss.

The FOUR reasons why we oppose the exploratory drilling project, as submitted, are:

- The inequities in the governance process, whereby the risks and the benefits involved with the development of the Saint-Lawrence Gulf are not equally divided amongst the shareholders;
- The appearance of conflict of interest in the administrative body's role as an industrial development promoter and security watchdog;
- The underestimation of risks involved for the natural environment and parallel industries in the Gulf;
- The absence of vision with regard to the possible alternatives of development of the Gulf.

In light of these objections, WE DEMAND A COMPLETE INTERPROVINCIAL MORATORIUM ON ANY AND ALL GAS AND OIL PROJECT IN THE SAINT-LAWRENCE GULF, UNTIL SUCH A TIME AS AN INTEGRATED AND INDEPENDENT ADMINISTRATIVE BODY, INCLUDING ALL STAKEHOLDERS, IS FORMED AND A GLOBAL DEVELOPMENT POLICY ACCEPTED BY THE COASTAL COMMUNITY.

1. Governance

The shared nature of the Saint-Lawrence Gulf is not reflected in the established mode of governance. While the federal government has assumed its responsibility with regard to the fisheries in the Gulf, as mandated by its constitutional power, it has failed to do so with regards to the natural resources in the sea floor, prior to delegating those powers. It has thus developed joint administrative bodies (ex. CNLOPB) to separately regulate the gas and oil projects within provincial boundaries, but has completely failed to provide a forum of discussion and exchange where these bodies could coordinate their policies. Against all principles of sustainable development and adaptive management, there are no efforts made to facilitate communication between the stakeholders, let alone to develop an integrated approach to

managing this all but enclosed body of water. The governments of Canada, Newfoundland and Labrador and now Quebec have proven a total lack of vision and understanding for the issues involved in the management of the Saint-Laurence Gulf.

What are these issues? They are numerous, and vary depending on the point of view taken. Fishermen don't necessarily have the same perspective on the management of the Gulf as do tourism operators, marine biologists, energy developers, native communities or any of the other parties with vested interest in the future of the Gulf. This is why the regulating body responsible for the management of the Gulf NEEDS to be inclusive and represent the peoples of all the coastal communities. This is not to say that the final decision will necessarily be against drilling in the Gulf, but that that decision MUST be taken with the BEST INTEREST of ALL PARTIES IN MIND. And that cannot be done by a panel of five men, none of whom are trained in governance, sustainable development methods or integrated management.

It is then impossible for anyone within the Gulf community to recognize the authority of the CNLOPB in this matter. While it may have the competence to administrate affairs in the territorial waters off the eastern coast of Newfoundland & Labrador, this body is not enabled to do so in the shared waters of the Gulf of the Saint-Laurence. This project cannot be reviewed by the CNLOPB and therefore cannot be carried out, in the absence of a competent overseeing body.

2. Appearance of conflict of interest

It is also worrying to notice that the same body responsible for the carrying out of the environmental and safety assessments is responsible for the promotion and development of the industry it is overseeing¹. As it has been reported in the Wells Report (2010) and the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling Report (Graham & Reilly 2011), the economic interests of the promoting fossil fuel industry trump the environmental and human safety preoccupations, leading to lax regulation and cost cutting. While there may be no actual conflict of interest, the appearance of such a conflict is sufficient to warrant the disbanding of the actual CNLOPB and the reformation of an appropriately independent entity. Such a development would, furthermore, be in respect of the Canadian Environmental Assessment Act (CEA Act art.20).

¹ http://www.cnlopb.nl.ca/abt_mandate.shtml

3. Environmental risk assessment

The present project description refers solely to the drilling of one well, making no reference to secondary (relief) wells - the lack of which was responsible, in part, for the well-head blowout mismanagement in the case of the PB oil-spill in 2010, nor to the additional wells that may be drilled later. It thus underestimates the environmental impacts of the drilling process and underlines a substantial lack of foresight on behalf of the promoter.

The Environmental Assessment (EA) proposal also fails to mention any consideration for the tourism industry and how it may be affected by drilling in the Gulf. It does not consider the potential impacts on the change in the perception potential visitors or business partners may have of the Gulf if it becomes a central drilling ground. The tourism and fisheries are well established, multi-billion dollar industries on which 5 provinces rely, and who also rely on the good reputation of the Gulf's environmental health for subsistence. Let us remind the Office, here, again, that the Gulf is not the open sea and that the repercussions of any spill, contamination or other become multiplied by the enclosed nature of the local environment.

Furthermore, with regard to biological sensitivity, the proposal projects the drilling operation to occur over 20 to 50 days, during an ice-free period. That, for anyone who has lived in the Gulf, means that the months of January to end- April are excluded from the drilling period. And knowing that the fall is characterized by strong winds, this leaves only the summer months for a safe drilling operation. The promoter does, however, identify the summer as a period of migration for a number of economically important species, notably *Thunnus thynnus thynnus* and *Hippoglossus hippoglossus*. Numerous other species like *Raja* sp., *Sebastes* sp., not to mention *Gadus morhua*, an endangered species, are present at the site year round, many of them having a spawning period at the beginning of the fall. This leaves a very short, if existent, window of opportunity for the promoter to carry out the drilling, a notable deranging activity by any standards. Also, the Laurentian Chanel is the transit-highway for many species who migrate in and out of the Gulf. These include such at risk species as *Balaenoptera musculus*, *Eubalaena glacialis*, *Hyperoodon ampullatus*, *Balaenoptera physalus* and *Dermochelys coriacea*, the 2 latter species occurring frequently at the drill site.

Thirdly, the EA will pertain only to the area directly impacted by the drilling activity, and ignores the potential impacts on the ensemble of the gulf. The following are results of modeling done by the Suzuki

Foundation, estimating contamination in a 10 000 barrel/day spill occurring at the Old Harry site (the BP spill-rate in 2010 was estimated at between 53 000 and 62 000 barrels/day) in winter, spring, summer and fall. The estimated contaminated areas are in green, with landing areas marked in red. The results are compared with the localization of land and marine zones of ecological and biological importance, as identified by the project description report provided by the promoter. It is important to recognize the existing OVERLAP BETWEEN THE SENSITIVE AREAS AND THE PRIME CONTAMINATED AREAS SHOULD A SPILL OCCUR.



Winter time spill model
<http://www.davidsuzuki.org/issues/oceans/science/marine-planning-and-conservation/an-oil-spill-in-the-gulf-of-st-lawrence-could-threaten-five-provinces/>

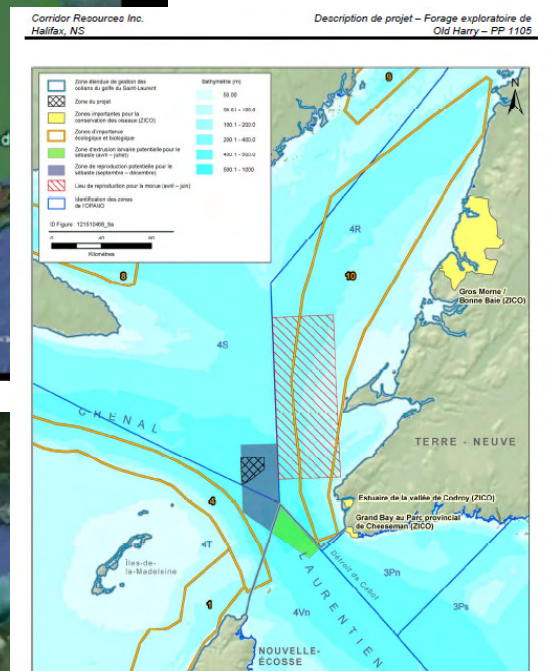
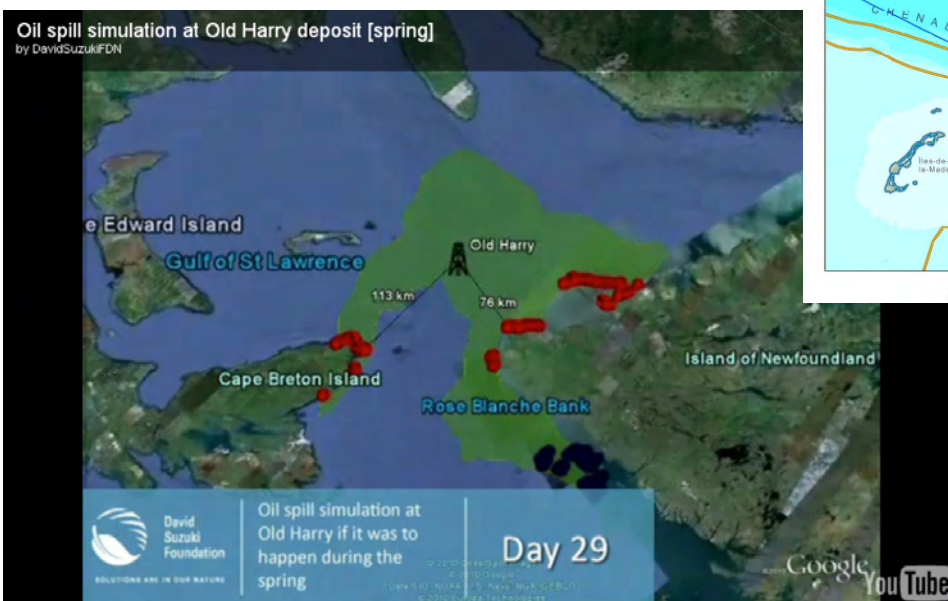


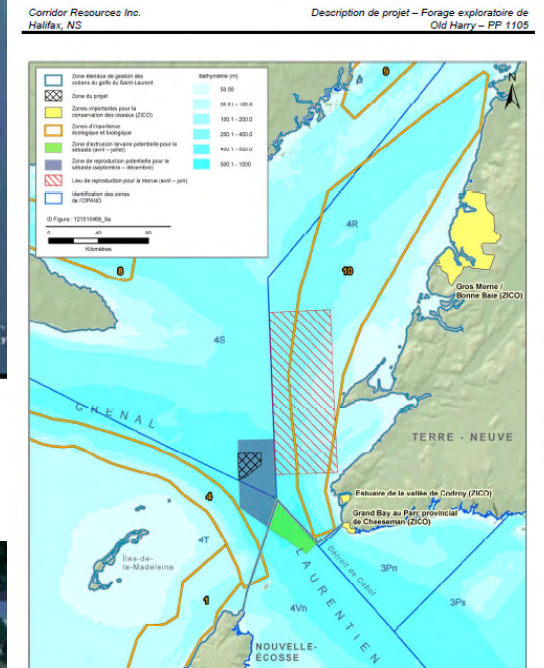
Figure 4.1 Zones fragiles près de PP 1105



Spring time spill model



⇐ Summer time spill model



⇐ Fall time spill model

4. Vision for development

Corridor Resources' Old-Harry drilling project, finally, lacks vision for the development of the Saint-Lawrence Gulf. While it is not their prerogative to plan out an integrated management plan for this shared body of water, it is their responsibility to consider the cumulative effects their project has on the

other resources of the Gulf. In this sense it is the CNLOPB's most fundamental responsibility to assure that the Gulf is managed with the best interests of present AND FUTURE populations in mind. That being said, the CNLOPB has thus far completely failed to assume this responsibility: nowhere in the project is the no-go option addressed and its benefits evaluated. Nowhere does the body envision the benefits of leaving the oil where it lies, for future generations better able to extract it or more in need of it. Nowhere are the global ramifications for this project addressed, notably the carbon footprint such a project may have on the region. Nowhere are alternative methods of producing energy tackled. The Gulf is rich in algae, a potential source of "green" oil; it is rich in wind energy and tidal energy. While we understand that these are beyond the scope of the EA, we don't see why these alternatives not being considered for the long term development of this community. Why is there such a rush to drill at Old-Harry, while the entire North-American coast falls progressively under a moratorium on off-shore gas/oil projects? Why is the EA so limited as to turn a blind eye to the larger, more vital repercussions of drilling at Old-Harry, focusing solely on the minimal implications of drilling on a 304 km² area? Could this be for any other reason than the fact that the CNLOPB's mandate is designed to be, from the start, favorable to gas and oil development? How can, in this case, the population ever accept its credibility and authority over such a sensitive matter?

We are adamant about the absolute necessity for a transparent, equitable and integrative assessment of the potential for gas and oil development in the Saint-Lawrence Gulf, and demand that a full moratorium be imposed on any and all fossil fuel development projects in the Gulf until such a time as the entire coastal community, from all five bordering provinces be consulted and an integrated management policy developed for this vulnerable and rich ecosystem.

Thank you

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