

REVIEW COMMENTS

St. Lawrence Coalition/Ecojustice

1: Corridor is requested to provide a complete explanation, with supporting documents, for their reliance upon the (probabilistic) calculated blowout frequencies (see s. 8.4.5). We do not have confidence in the bases for conclusions that the likelihood of an extremely large oil spill (>150,000 barrels) is equivalent to 1 in 25,189 for each well drilled, a very large oil spill (>10,000 barrels) is equivalent to 1 in 12,610 for each well drilled, and a large oil spill (>1000 barrels) is equivalent to 1 in 10,091 for each well drilled. Obviously, the probability of a blowout increases significantly with each additional exploratory well drilled, and must be clearly incorporated into risk calculations. In addition, these probabilities are inconsistent with those presented by Mr. David Pryce (see below). Finally it is critical that uncertainties inherent in such probabilistic assertions be articulated plainly with a view to enabling public comprehension.

It is obviously true that not every well results in a serious “loss of control” incident. Statistics about the unlikelihood of an accident may seem reassuring to some, at least in the abstract: only four blowouts out of 647 Canadian wells drilled by 2010 (one blowout every 16 years)¹, one pipeline spill over 1,000 litres in Canada between 2003 and 2012², and 3.3 tanker spills over 7 tonnes per year worldwide from 2000 to 2009³.

2: Corridor is requested to explain their “low risk” characterization in relation to potential spill impacts on commercial fisheries, based on the assertion of limited fishing activity within 10-12km of the proposed drill site. Furthermore, this characterization is based on Corridor’s spill simulation that has been heavily criticized by DFO and EC. We further submit that Corridor has failed to account for the prospect of future stigma risks to regional fisheries interests, should a spill occur. Thus, the negative impacts on the fisheries sector related to a spill would occur even if the oil did not physically reach areas of the Gulf that are subject to fisheries operations.

3: Corridor still does not address the fact that a 23-year old reference is provided to show no significant mortality to marine mammals, while recent oil spills have shown the contrary.

¹ Standing Committee on Natural Resources, testimony of Mr. David Pryce (May 13, 2010). Online <http://www.parl.gc.ca/HousePublications/Publication.aspx?DocId=4534063&Language=E&Mode=1>

² Transportation Board, Statistical Summary, Pipeline Occurrences 2012” (2012) online: TSB <http://www.bst-tsb.gc.ca/eng/stats/pipeline/2012/ss12.asp>

³ International Tanker Owners Pollution Federation Limited, “Statistics” (2012) online: ITOPF <http://www.itopf.com/information-services/data-and-statistics/statistics/>