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September 12, 2011

L-HE-CNO-110912-01

Mr. Dave Burley
Manager, Environmental Affairs
Canada-Newfoundland and Labrador
Offshore Petroleum Board
5th Floor TD Place
140 Water Street
St. John's NL A1A 6H6

Dear Mr. Burley:

Re: Hebron Project Comprehensive Study Report - Response to C-NLOPB comments on Section 14.1

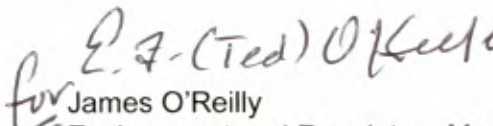
As discussed with C-NLOPB staff on September 12, 2011 regarding the recent comments on Section 14.1, the spill frequency data presented in the CSR represents the most recent publicly available data. The source of the spill frequency data for deep blow-outs is IAOGP 2010, as referenced in the CSR. No other source is used for this data set. EMCP is confident that the data presented in the report accurately represents the global spill frequency data available in the public domain.

As indicated in our September 8, 2011 response, at the time of application for an Operations Authorization for platform drilling and production activities, EMCP will review any new publicly available spill frequency data and report its findings to the C-NLOPB.

With regard to the suggested revisions to text, the changes have been incorporated into the CSR and the revised pages are attached for your reference.

Upon closure of these comments, EMCP will submit the final CSR to the C-NLOPB.

Yours truly,


for James O'Reilly
Environment and Regulatory Manager

Enclosures