

The Alder Institute

Tors Cove, Newfoundland & Labrador, Canada, A0A 4A0

August 11, 2010

Public Comments – Hebron Development Project
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water St., St. John's, NL
A1C 6H6
Ph: 709-778-1400
Email: information@cnlopb.nl.ca

Re: Response to invitation for public comment on the draft *Comprehensive Study Report (CSR) for the Hebron Development Project*

The draft *Comprehensive Study Report (CSR) for the Hebron Development Project* breaks the Project Environment down in to nearshore (construction) and offshore (operations) environments. The Nearshore Study Area is where the platform will be constructed and the Offshore Study Area is where the platform will be installed for the purpose of bringing oil to the surface and storing it within the fixed structure.

We find the scope of the project deficient in not including in the Project Environment the area pertaining to the transportation of the product from the production platform to the Newfoundland Transshipment Facility or to market. For example Table 2-9 includes the offloading of produced crude as an anticipated activity but it does not include the “transportation of produced crude”. We request that this omission be corrected. We do not find the coverage of this issue provided by 2.9.5 adequate.

Shore base support is vague on what areas other than St. John's are to be used. We request that any use of other areas such as Bay Bulls must be noted specifically and

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assessed as part of the project. Bay Bulls is of particular interest due to its proximity to the Witless Bay Ecological Reserve. If Bay Bulls is not mentioned and assessed as part of the project area we request that it be a limitation of any licenses provided to the operators that they are not licensed to utilize Bay Bulls for any purpose. We request that all onshore sites anticipated to be used by the Hebron Project must be identified and included in the scope of the project's environmental assessment.

While the draft CSR states that no new tankers will be added to the fleet of those presently servicing the offshore area near Hebron it must be assumed that the frequency of tanker traffic may increase. We request more detailed presentation of information on this traffic and a separate assessment of the cumulative risk of tanker accidents in Placentia Bay that may accrue from the addition of the Hebron Project.

We request that when using statistics to summarize data which are not normally distributed that the use of means be replaced by the use of medians and whenever possible plots of raw data distributions be presented rather than only data summaries. For example, Figure 3-39 which depicts "average number of icebergs" is not useful in providing a true impression of the likely number of icebergs one might encounter. This sort of criticism of ice berg data presentation was made years ago by the Natural History Society of Newfoundland Labrador (NHSNL) during the Terra Nova Public Hearings. It is frustrating to see the same sort of misleading data presentation techniques in use so many years later. We request that the submission of the NHSNL to the Terra Nova Panel and subsequent submissions from the NHSNL and the Alder Institute pertaining to Terra Nova, White Rose and Orphan Basin project reviews be utilized in assessing the EA reports submitted by the Hebron proponent. Has there been an improvement in our

The Alder Institute

Tors Cove, Newfoundland and Labrador, Canada A0A 4A0, Phone: (709) 334-3911

Email: alder@alder.nf.ca Website: www.alder.nf.ca

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understanding on issues that were of importance in those reviews? Has new information been included in the current assessment documents?

With respect to marine birds, the draft CSR concludes that “*While there is no known mitigation, flaring is expected to have minimal effect on marine bird populations over the duration of the Project.*” We are not convinced of the validity of this conclusion. We request that a detailed presentation of new research on this subject be required before the CSR is finalized including in the final CSR a detailed discussion of the evidence for the above conclusion.

We note that the Waste Treatment Guidelines have not been reviewed on the five year rotation schedule to which the C-NLOPB is committed. The current Guidelines in use are from 2002 while they are supposed to be reviewed each five year period. We request that the next step in the evaluation of Hebron be postponed until such time as the review of the Waste Treatment Guidelines has been completed. We also request that the study of the feasibility of the reinjection of Produced Water be required to be included in the final CSR.

We request that the section of the final CSR addressing the “need for the project” include a discussion of the project in the context of green house gas emissions and Canada’s energy policy and energy needs i.e. define the project as an “energy project” rather than simply an oil project. Alternatives to the project should include a review of the assumption that there is a need to increase the supply of fossil fuels at this time.

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Given the recent history of the North American offshore industry with the BP spill in the Gulf of Mexico and the increased scrutiny being brought to bear on offshore oil development throughout the world we suggest that we are in an extraordinary period in the development of our offshore oil and gas industry. We request that despite the Minister of Environment's earlier decision to remain with a comprehensive study approach that the environmental assessment process for the Hebron Project be upgraded to a full public review. If it continues to proceed as a comprehensive study we request the reopening of a call for applications by the CEA for participant funding which apparently took place back in May 2009. Although we have participated with CEA funding in earlier Environmental Assessments we were not made aware of that call and we did not see the request at that time. I would suggest that the fact that no applications were received is not a reflection of interest in such support for public interest groups rather it reflects a failure on the part of the CNLOPB and CEA to make sure that interested groups such as the Alder Institute were aware of such an opportunity. Without such opportunities it is difficult for the public to make meaningful comments on projects as complex as this one.

We request that we be added to your news release recipient list.

We thank-you for this opportunity for input. We look forward to receiving a reply.

Sincerely,

Janet Russell

Director