



*...exploring for petroleum and minerals in Canada...
Searching new areas for large deposits...*

To: Canada-Newfoundland and Labrador Offshore Petroleum Board

Attention: Steve Bonnell, AMEC Environment and Infrastructure
via email - [REDACTED]

Copy: Shawn Kelly
via email - [REDACTED]

Re: Submission to the Western Newfoundland and Labrador Offshore Area
Strategic Environmental Assessment - Consultation Process

Date: February 27, 2013

As an active explorer in western Newfoundland for over 15 years we want to express our desire to see continued access to the offshore area for petroleum exploration and development. The petroleum potential of the area is immense and unexplored. But like any exploratory effort it must be done in a way that respects the rights of other resource users in the area. With open communication and mutual education, we believe all stakeholders can responsibly share in the opportunities the offshore area presents.

We live in a time of heightened environmental awareness. But we must not allow ourselves to be polarized by extreme positions on access to lands issues. Our objective should be a recognition that the offshore's history of multi-use with fisheries etc. can continue and thrive. Neither activity need exclude the other, though each may be impacted by the other. It should be remembered that petroleum exploration and development is only a temporary use for the lands, such that if conducted appropriately, need not leave any tangible evidence of its existence other than the benefits that it bestows upon those affected.

Numerous interest groups are vying to control the resource lands of Canada. Within our province barriers are constantly being erected to limit, restrict or prohibit access to lands for resource exploration and development. There seems to be little regard to the fact that exploratory efforts encompass a much larger survey area than the development of a commercial discovery per se, and that both activities do not involve the same risks and burdens. Therefore, clear distinctions need to be made between exploration and development concerns.

We also need to be cognizant of the slow encroachment of restrictions on access to lands which we have witnessed in the onshore areas of the province. Onshore barriers include Natural Areas Systems Plan -Wilderness and Ecological Reserves, National Parks (proposed and actual),

Sensitive Wildlife areas, Caribou occupancy areas, Aboriginal claim areas, watersheds, and related protected areas which generally encompass exaggerated land areas etc. Also, where access is permitted there is a growing mass of constricting regulations to deter any activity. Some of these barriers are poorly defined with little transparency and no predictive outcomes for any proposed exploration activities. Such a convoluted destiny for the offshore area would be fatal to exploration and development. Instead, a clear vision, with predictable outcomes needs to be created for offshore land access taking into account the seasonal nature of offshore exploration and fishing activities.

We also question the value of the Environmental Studies Research Funds (ESRF). We see very little accountability in the process, no opportunity for input and a directionless mandate. It appears to be a relic from the Canada Oil and Gas Lands legislation that predated the Accord legislation. We see no compelling reason for it to continue to exist. Environmental studies in the offshore area need to be conceived and delivered in a more deliberate and effective way. Imposing levees on licence holders on an acreage basis is unimaginative and ineffective. The operators should be permitted to carry out the necessary environmental studies as required, according to some objective regulatory policy standards to ensure consistency and utility of the work conducted.

The economy of this province is very dependent on resource development. We have been blessed with an abundance of natural resources. The responsible development of these resources have allowed us to enjoy our current standard of living. We do not have a diversified economy which can easily adapt to declining resource revenues. With a small population and a diverse geography we can easily re-visit depressed economic conditions. We therefore have a responsibility to ensure that our resource development is given every opportunity to proceed for the benefit of current and future generations. It must proceed in a context of respect for the environment and safety for the individuals involved. Fortunately, offshore oil and gas exploration and development is not a new industry. It is a well-developed industry which has a very good safety record. The risks that the operations impose have to be taken seriously to ensure proper mitigative measures are in place. But we must not let irrational fears and misconceptions paralyze us into a state of moratoria or inactivity. We simply can't afford such an outcome. We as a province and an industry, are quite capable of carrying on petroleum activity in western Newfoundland and the Gulf of St. Lawrence in a competent manner.

It is our experience that when restrictions to land access are put in place they are enshrined forever, while permitted access seems to be under constant attack until it becomes impractical due to incremental limitations. As a result, the burden of proving that a restriction is absolutely required should be squarely on the shoulders of the party proposing the restriction.

Respectfully submitted,

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