

Scott Tessier (Chair & CEO)
Canada-Newfoundland and Labrador
Offshore Petroleum Board(C-NLOPB)
5th floor TD Place, 140 Water Street
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Dear Mr. Tessier,

Re: Public Review of Draft Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment and Update Report

Thank you for the opportunity to comment on the SEA draft report.

As a resident who was born, grew up and continues to live in the Bay St. George area on west coast of Newfoundland, I am very concerned about the very controversial process of hydraulic fracturing and the proposed plans for drilling projects using hydraulic fracturing in onshore- to- offshore operations to extract shale oil underneath the seabed here on the west coast.

Here is a list of my concerns:

1. The draft report shows a lack of social acceptability in all five Gulf provinces
2. Newfoundland's west coast has many sensitive and unique sectors vital to the Gulf ecosystem's health.
3. Our tourism and fisheries sectors are very important. Their successful cohabitation with oil and gas activities would be very difficult, if not impossible.
4. The draft report says that the efficiency of proposed mitigation measures is not proven.
5. AMEC's report is weak in many respects and is not adequate to serve as a decision tool for the C-NLOPB because comments and briefs presented by the public in the autumn of 2012 were not correctly addressed and integrated in the draft report. Impacts and risks of offshore oil and gas activities as well as the process of hydraulic fracturing have been minimized throughout the report. The economic importance of fisheries and tourism

are greater than shown in the draft report. Mitigation measures proposed by AMEC are weak and intervention capacity in the case of oil spills is clearly inadequate.

6. The Western Newfoundland offshore SEA draft report clearly establishes the biological importance and sensitivity of Newfoundland's offshore area in the Gulf and the importance of fisheries and tourism.
7. It establishes that there are huge gaps concerning biological knowledge and impact of oil and gas activities, that there are uncertainties concerning the efficiency of mitigation measures and that there are very real and enormous impacts of any oil spill.
8. Former Commissioner to the Environment and Sustainable Development, Scott Vaughn cautioned that intervention capacity in the Gulf of St. Lawrence is inadequate.
9. The liability limit for oil companies is still limited at \$30,000,000. This limit could be increased to \$1,000,000,000 according to Minister Oliver, an amount that remains small compared to a potential spill. Costs in the Gulf of Mexico have surpassed \$42,000,000,000 to date.

The following recommendations put forth by the St. Lawrence Coalition reflect how I feel and what I believe needs to be carried out.

1. The C-NLOPB should defer the issuing of any new exploration licenses in the Newfoundland offshore area.
2. The C-NLOPB should cancel the call for bids issued on May 16, 2013 for four parcels in the Newfoundland offshore area.
3. The C-NLOPB must refrain from giving authorization to projects currently submitted in the Gulf of St. Lawrence, including Corridor Resources' Old Harry or Shoal Point Energy and Black Spruce Exploration's Western Newfoundland drilling program.
4. The C-NLOPB must submit to public scrutiny the recommendations and conclusions of the final SEA report.

I believe that the C-NLOPB and the Provincial Department of Environment and Conservation as partners in the conjoint regulatory

body should not be both a facilitator of oil and gas development and a regulator for work safety and environmental protection.

In its present form, I believe the C-NLOPB has little credibility and legitimacy. The Board is conducting a SEA to determine if it is appropriate to proceed with oil and gas development in the Gulf of St. Lawrence, while simultaneously allowing seismic testing, issuing licenses, making land ownership and control agreements with oil companies to facilitate oil and gas exploration and development. I believe that to be a serious conflict of interest.

I will be asking the Provincial and Federal governments to enact a moratorium on oil and gas exploration and development in the Gulf of St. Lawrence until they have established a more democratic and ecosystem based management system and until oil and gas development are subject to a credible independent, science-based environmental process.

Sincerely,

Denise McIsaac



Cc. Kathy Dunderdale

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