



Mr. Scott Tessier

Chair & CEO CN-LOPB

5<sup>th</sup> Floor TD Place, 140 Water Street

St. John's, NL A1C 6H6

Dear Mr. Tessier:

**RE: The CN-LOPB and the Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment and Update Report**

---

I am writing in regard to the SEA Update Report prepared by AMEC. While this is a very lengthy report, and it would appear that AMEC covered a lot of territory, there are some questions that arise from this update.

My first question is related to Section 5.1. While AMEC lists Potential Environmental Interactions with various species within the proposed drilling areas that may be affected by drilling activities, the second column covers usual practices of oil companies called Potential (standard) Mitigation. My question is IF you plan to continue with the Potential (Standard) Mitigation practices, who is monitoring the oil companies to ensure that these practices are actually implemented? Does CN-LOPB have enough staff who are able to monitor the oil company (Black Spruce in this instance) to ensure that they are protecting both the environment and any species that may be affected by drilling activities or oil spills or do you just assume that the oil company is following Potential (Standard) Mitigation? I think that the answer to this would be no.

Secondly there is an area that seems to have been overlooked in the report. The Limestone Barrens and Limestone Bedrock extend from the Port au Port Peninsula to the northern tip of the Great Northern Peninsula and along sections of the Labrador Straits. This habitat is fragile and ATVs and other vehicles can kill these fragile plants and damage their habitat. Some of these plants are Long's Braya, Mountain Avens, Purple Saxifrage, Barrens Willow and Fernald's Braya. Currently Barrens Willow is endangered and Fernald's Braya is threatened. In the event of an oil spill, holding ponds evaporating into the atmosphere, flaring of natural gas, or chemicals leaking from drill sites, how will protection of these plants be ensured? How will increased traffic flow by oil trucks and their emissions affect these plants? Perhaps this could also be addressed in any revisions.

I notice that there was no synthesis map of all the sensitive or biologically important areas presented in the report. Such a map would have helped us realize that just about all of the Western Coast of Newfoundland qualifies as important or sensitive area.

In closing, I would like to hope that greed is not the motivating factor in leasing lands to oil companies and giving them the OK to start drilling before all questions have been answered. If there are any doubts, then a moratorium on all drilling and leasing of land on the west coast should be the answer.

Yours truly,

Donna Shears