



September 27, 2013

Scott Tessier, Chairman and Chief Executive Officer,
Canada- Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St John's NL, A1C 6H6
information@cnlopb.nl.ca

Dear Sir,

I am a resident of Rocky Harbour and I am writing to comment on the Western Newfoundland and Labrador Offshore Area Strategic Environmental Assessment Draft Report (SEA) prepared by AMEC.

My understanding is that the SEA report is part of the evaluation process that the CNLOPB uses to determine the issuance of licences for oil exploration in the Gulf of St Lawrence. Many of my immediate concerns are related to the prospect of onshore oil or gas development. Although land based and using fracking technology, it will involve offshore drilling which would be overseen by the CNLOPB.

After reviewing the report from AMEC, my concerns about oil development in the Gulf of St Lawrence and in particular the west coast of Newfoundland, have grown. There is enough information provided in the report to conclude that further oil and gas development activities should not be allowed in the Gulf.

My own experience, plus what I have researched, indicates that there is a lot of concern from the people that live in the area about the adverse impacts of oil and gas development on the region. There are many information gaps that should be addressed before any further development takes place.

The Gulf of St Lawrence has many sensitive habitats, including estuaries, fish spawning and rearing habitat, sea bird and marine mammal habitat, as well as Species at Risk or of Concern. The biological diversity of the area is significant, and many people make their living from occupations that depend on a stable healthy environment. I can't see how tourism and a healthy fishery can survive in an industrialised landscape. Any development with the potential to further harm inshore fisheries should just not be considered.

The provincial government and tourism operators have put a huge amount of effort and money into attracting visitors to the island. The Gros Morne Area in particular has become a tourism icon destination. It seems short-sighted to encourage the development of a non renewable oil industry that conflicts with already established and viable industries that contribute significantly to the local economy.

The Amec report indicates that fracking has been used since the 1950's, but the technology and methods used then are not what the drilling companies would be doing today. This can not be glossed over. The development being proposed for my area involves onshore to offshore drilling with fracking as the means of extracting "tight" oil from shale.

There are so many issues to be addressed with this technology. There is a huge lack of information on the specifics of how this would be done and what the effects would be on the environment. What chemicals? What water? Fresh? Salt? Where will it come from? How will the massive volumes of fluids be transported, disposed of? Do we really want the huge number of trucks necessary to feed this industrial development travelling through a national park and our small towns? Every year we have transport trucks go off the road and dump whatever load they are carrying, be it fish or logs or something else. The number of accidents would be expected to increase with an increase in truck traffic. Who will respond to these events? Who will pay for it? Bonne Bay is a unique and sensitive environment surrounded by a UNESCO World Heritage site. The highway runs right beside it. We don't want another oil spill there. This issue seems to be left to companies to deal with, or not. Wouldn't it make more sense to have this sorted out at a broader, higher level?

What is the potential for chemicals or naturally occurring heavy metals and radio active elements to migrate through rock fissures, either natural or caused by the fracking? Is there potential for earth quakes? How far does the energy from the fracking process propagate in the rock formations here? Is there risk of triggering rock fall in the nearby fjords? Should there not be a review of accidents related to fracking?

The biggest threats to the ecological health and sustainability of national parks come from industrial developments often just outside the parks. The Gulf region has several national parks, including Gros Morne. Here we are again having to try and defend protected areas from more potential impacts. The report doesn't address how federally protected areas such as national parks will be protected from the effects of industrial development. Any decisions about oil and gas development must include consideration for the real protection of all the National Parks and other conservation areas around the Gulf of St Lawrence. These areas and other ecologically sensitive areas should have buffer zones around them. Fishing grounds should also be protected.

I would like to see careful, thoughtful consideration and evaluation of all these issues before more licences or oil and gas development of any kind proceeds in the Gulf region. There needs to be further opportunity for public consultation and review of any recommendations and conclusions from the final SEA report.

Sincerely,

Jennifer Hoffman