

Norris, Sara

From: Marjorie Robertson [REDACTED]
Sent: Thursday, September 26, 2013 8:49 PM
To: Scott Kelly; premier@gov.ca; Minister@ec.gc.ca; SusanSullivan@gov.nl.ca; thedderson@gov.nl.ca; tommarshall@gov.nl.ca; Information
Cc: stephen.harper@parl.gc.ca
Subject: Public Review of draft Western Nl.offshore area Strategic Environmental Assessment and Update Report

Scott Tessier (Chair & CEO)
Canada-Newfoundland and Labrador
Offshore Petroleum Board (C-NLOPB)
5th Floor TD Place, 140 Water Street
St. John's, Newfoundland & Labrador
Canada A1C 6H6
information@cnlopb.nl.ca.

Dear Mr Tessier;

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

The following are my comments pertaining to the 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. The bay is unique and special in its unusual tides and currents which can be very extreme in size and force. The bay is subject to the prevailing south westerly winds which originate in the Gulf of St. Lawrence and maritime provinces. The report mentions that a major oil spill in the Gulf has the potential to affect a vast territory because, among others, of the dynamic character of currents in the Gulf .

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 worker safety and environmental protection.

The Board is conducting a strategic environmental assessment to supposedly determine if it is appropriate to proceed with oil and gas development in Newfoundland's gulf waters and at the same time it is allowing seismic testing, issuing licenses, making land ownership and control agreements with oil companies and otherwise facilitating oil and gas exploration and development.

I am asking our 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 governance and ecosystem based management system and until oil and gas exploration and development are subject to a credible independent, science based environmental assessment process.

Regarding hydraulic fracturing, drilling projects on the West Coast of Newfoundland plan on using hydraulic fracturing, in onshore-to-offshore operations, to extract shale oil from underneath the seabed. The offshore portion of the operation falls under the jurisdiction of the C-NLOPB. While AMEC,(a consulting firm very active in the oil and gas industry), had not planned on covering that aspect of oil activities, intense concerns and public pressure on the West Coast during the Fall 2012 public consultation forced them to consider the hydraulic fracturing issue. After a very short and incomplete review of techniques and potential impacts, AMEC concludes that public concerns are sufficiently high in Newfoundland to justify more consultations and discussions before allowing this industry (sect. 5.4.2).

An important part of the report is devoted to identify sensitive or biologically important zones within the Newfoundland part of the Gulf. A careful reading of the report makes one realize that all of the Newfoundland part of the Gulf could be labelled as important or sensitive.(sect.4.2.1.7) (sect.5.3.3.2)

Apart from the proposed mitigation measures, the AMEC report does not contain any recommendations or conclusions on, for example, the relevance of issuing new exploration licenses or on sensitive zones to protect.It is worrying to learn that recommendations will be known only next Fall, when the final SEA report will be released. Indeed the public will have no opportunity to comment on these recommendations, potentially very important for the future of the Gulf, since no other specific consultation period is planned.

I believe the C-NLOPB has a chance to improve its credibility and legitimacy The Board is conducting a strategic environmental assessment to supposedly determine if it is appropriate to proceed with oil and gas development in Newfoundland's gulf waters and at the same time it is allowing seismic testing, issuing licenses, making land ownership and control agreements with oil companies and otherwise facilitating oil and gas exploration and development.

I will be asking our 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 governance and ecosystem based management system and until oil and gas exploration and development are subject to a credible independent, science based environmental assessment process.

I am recommending to the Canada-Newfoundland and Labrador Offshore Petroleum Board;

- To defer the issuing of any new exploration licenses in the Newfoundland offshore area;
- To cancel the call for bids issued on May 16th 2013 for four parcels in the Newfoundland offshore area;
- To refrain from giving authorizations to projects currently submitted in the Gulf of St. Lawrence, including Corridor Resources' Old Harry project or Black Spruce Exploration's Western Newfoundland drilling program.
- To submit to public scrutiny the recommendations and conclusions of the final SEA report.

Sincerely,

Marjorie Robertson