

September 17, 2013

Scott Tessier (Chair & CEO)
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Offshore Petroleum Board (C-NLOPB)
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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. I have been involved in the lobster fishery for several years in the Bay St. George area. 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. In Bay St. George area, there are many sensitive plant and wildlife habitats including the Codroy Valley estuary and the Stephenville Crossing Gut which are resting grounds for thousands of migratory birds. Sandy Point is home to the piping plover and 8 major salmon rivers flow into the bay.

The AMEC (a consulting firm that is very active in the oil and gas industry) 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 (which I support, see above) and the mobility of many species. According to the report, coastal areas could be hit (sect. 5.4.1).

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 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 little credibility and legitimacy in its present form. 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 that the Canada-Newfoundland and Labrador Offshore Petroleum Board :

- defer the issuing of any new exploration licenses in the Newfoundland offshore area;
- cancel the call for bids issued on May 16th 2013 for four parcels in the Newfoundland offshore area;
- 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.
- submit to public scrutiny the recommendations and conclusions of the final SEA report.

Sincerely,
Wayne Hounsell



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