

December 21, 2010

C-NLOPB
140 Water Street
St. John's, NL
A1C 6H6

Hi,

I provided comments on the Hebron offshore oil production project in NL. One of the comments I provided was that each prediction did not have a corresponding level of probability of occurrence and scientific certainty.

The proponent's response: "The level of certainty was determined for predicted residual environmental effects for each Project phase (Construction and Installation, Operation and Maintenance, Decommissioning and Abandonment, Accidental Events, Cumulative Effects). This is consistent with guidance provided by the CEA Agency (CEA Agency 1994) and represents a comprehensive level of certainty for each effect that occurs within that Project phase." (Hebron Project Comprehensive Study Report Response to Consolidated Review Comments, Part 1 Page 83 of 152 November 26, 2010)

However, the last offshore oil production project in 2000, the White Rose, did provide a both of those evaluative criteria (probability of occurrence and scientific certainty) to EACH PREDICTION in the EA, not each phase. So I see this change as one which provides less detail rather than more.

The deadline for responding to this section of the EA is Dec 23. I realize you may not be able to comment, but I wanted to express my concerns about this change in practice.

Thanks in advance for your help.

Gail Fraser
Faculty of Environmental Studies
York University
4700 Keele St.
Toronto, ON M3J 1P3