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Canada-Newfoundland & Labrador Offshore
Petroleum Board



L-HE-CNO-110822-01

August 22, 2011

Mr. Jeffrey M. Bugden, P. Eng.
Manager, Regulatory Coordination and Benefits
Canada-Newfoundland and Labrador Offshore Petroleum Board
Suite 500, TD Place
140 Water Street
St. John's, NL A1C 6H6

Dear Mr. Bugden:

Subject: C-NLOPB Completeness Review Comments #24 & #25

Further to our August 4, 2011 response to C-NLOPB's completeness review of the Hebron Development Application, and with particular reference to comments #24 and #25, please be advised of the proposed revision to replace the third paragraph in Section 14.1.2 - "Environmental Risk" of the Development Plan with the following paragraph:

"The TLS, in terms of risk to the environment associated with project activities, are defined qualitatively based on environmental effects analysis in the Hebron Project Comprehensive Study Report (CSR). The approach used is to identify Valued Environmental Components (VECs) (e.g., marine birds, fish and fish habitat, sensitive areas, etc.) and to evaluate the impact on such components against a number of variables which include, for example, the frequency and size of a spill and the ability of the VEC to recover. Where potential environmental impacts to the environment are identified, mitigation measures will be implemented to reduce the potential environmental impact."

Note: Within this section "TLS" was previously defined as "Target Levels of Safety"

Similar changes will also be made to the Concept Safety Analysis (Part II document), Section 4.2 with the above paragraph replacing paragraphs 3 and 4 of the initially submitted document.

We trust this response, together with our August 4th response to comment #24, now closes these two items.

Yours truly,

James E. O'Reilly
Environment and Regulatory Manager

cc Dave Burley