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23 September 2011

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Sept. 23, 2011 Public Review Hebron – Additional Information Stage

Len Zedel, (Associate Professor, Memorial University of Newfoundland, St. John's, NL) and Allan Stein (retired Professor of Chemistry, MUN) commenting on behalf of Nature Newfoundland and Labrador, P.O. Box 1013, St. John's, NL, A1C 5M3.

Nature Newfoundland and Labrador (formerly known as the Natural History Society of Newfoundland and Labrador) is frequently asked for and provides comments on oil and projects in the province.

If possible, we would appreciate clarification of two points in the Development Application:

i) We are pleased to see that the development is exploring the possibility of reinjecting produced water. At the moment, that option will be pursued if the associated risks are "understood and acceptable". We believe it would be appropriate for the proponent to quantify what constitutes acceptable and unacceptable risk.

ii) With regards to impacts to marine mammals caused by possible blasting operations: The primary mitigation identified is that marine mammal observers will be deployed (with suitable binoculars) to ensure that no marine mammals are present within specified exclusion zones. There are of course days in Newfoundland when fog precludes the effective use of binoculars! That point aside, would it be possible for the proponent to plan the timing of blasting operations to coincide with times of the year when few mammals are likely to be present?

Thank you for your time,

Len Zedel and Allan Stein

One of many citations on the dangers of intense underwater sounds to marine mammals:

Tyack PL, Zimmer WMX, Moretti D, Southall BL, Claridge DE, et al. 2011 Beaked Whales Respond to Simulated and Actual Navy Sonar. PLoS ONE 6(3): e17009. doi:10.1371/journal.pone.0017009

