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Attn: Shannon Lewis-Simpson
Communications Manager
Hebron Public Review Commission

Good day,

In order to further clarify my submission to the Commission on Monday, November 28th and questions arising from the presentation please see the following comments.

Regarding the DP classification of Shuttle Tankers (Dynamic Positioning class); Statoil requirements vary depending on the type of facility the tanker is loading from. My understanding for OLS operations, (the same as proposed for Hebron), Statoil would require shuttle tankers with DP class 1.

The tankers used on the Grand Banks are DP class 1 & 2. That is two tankers are DP class 1 & two tankers are DP class 2. The DP class 1 tankers are predominately used at Hibernia whereas the DP class 2 tankers are predominately used to load from the FPSO's where loading in close proximity to the FPSO requires the additional redundancy of the station keeping equipment and machinery.

I believe DP class 2 should be the minimum requirement for vessel's on the Grand Banks as the pool of available tankers is small. Past practice has shown that when tankers are removed from operation for maintenance, equipment failure or other reasons. They (the tankers) will be replaced by the remaining tankers in the pool. From the Development Plan it would appear the practice of pooling existing tankers for Hebron operations will be utilized until such time as the operators/proponents decide the existing tankers are no longer suitable.

I cannot stress enough the Grand Banks environment is unforgiving and we collectively should be striving to set a minimum standard that is appropriate therefore I believe DP class 2 tankers should be the minimum standard for future projects such as Hebron.

In hindsight I could have further clarified my comments regarding heavy weather ballast. Although the Development Plan does include a comment regarding de-ballasting segregated tanker ballast while loading offshore, it fails to mention or take into consideration heavy weather ballasting and the subsequent de-ballasting operations.

As some tankers are designed to carry additional segregated ballast, they are therefore by design less likely to be required to take heavy weather ballast.

I am of the opinion that tankers used on the Grand Banks should have additional segregated ballast capacity; this could be used as part of the criteria as to what constitutes "tanker suitability" as referenced to the Development Plan.

The existing shuttle tanker fleet is equipped to handle heavier crude oils provided the proposed off-loading system operates in a similar manner to that of Hibernia as described in the Development Plan. Should the design of the off-loading system be changed in order to accommodate the characteristics of the crude oil produced at Hebron; then further analysis would be required to ensure the compatibility of the off-loading system and the existing shuttle tankers.

Given the crude oil characteristics such as wax content, low pour point temperature & the ambient sea water temperature; it is reasonable to ask if additional precautions are required for offloading operations. This does not appear to be addressed in the Development Plan.

Regards,

Charles Newhook