CANADA-NEWFOUNDLAND and LABRADOR OFFSHORE PETROLEUM BOARD

December 2, 2011

Elaine Feldman
President
Canadian Environmental Assessment Agency
22nd Floor, 160 Elgin Street
Ottawa, ON K1A 0H3

Dear Ms. Feldman:

Re: Hebron Development Project - Comprehensive Study Report

The Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB) is pleased to provide responses, on behalf of all the responsible authorities (RAs) for the Hebron Development Project, to the comments received during the public comment period held from October 12, 2011 to November 14, 2011 on the Comprehensive Study Report (CSR) for the Project. The other RAs for the Project are Fisheries and Oceans Canada; Environment Canada; Transport Canada; and Industry Canada. Expert input to the CSR, in addition to that from the RAs, was received from Natural Resources Canada and from Health Canada.

It is the opinion of all the RAs that the information provided in the CSR adequately addresses the issues identified during the public comment period. The RAs have considered the comments and have determined that the conclusion reached during the comprehensive study process, that the project is not likely to result in significant adverse environmental effects, remains valid. Attached is a table providing the disposition of comments received during the public comment period. I have attached letters supporting the above statements from all the RAs.

Fifth Floor, TD Place, 140 Water Street, St. John's, NL, Canada A1C 6H6
Telephone (709) 778-1400 Fax (709) 778-1473

The C-NLOPB looks forward to receiving your Minister's environmental decision statement with respect to this Project. If you require further information, please contact Dave Burley at (709) 778-1403.

Sincerely,

Max Ruelokke, P. Eng.
Chairman & CEO

Attachments

cc: Paul Schafer, Canadian Environmental Assessment Agency
Bill Coulter, Canadian Environmental Assessment Agency
Dave Burley, Canada-Newfoundland and Labrador Offshore Petroleum Board
Glenn Troke, Environment Canada
Sara Lewis, Fisheries and Oceans Canada
Randy Decker, Transport Canada
Steven Mills, Industry Canada
Martin Anderson, Major Projects Management Office

Transport Canada / Transports Canada

November 21, 2011

Mr. Max Ruelokke, P. Eng.
Chairman & CEO
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street, St. John's, NL
A1C 6H6

Dear Mr. Ruelokke:

Re: Response to Comments Received on the Comprehensive Study Report for the Hebron Offshore Oil Development Proposal

As a Responsible Authority pursuant to the *Canadian Environmental Assessment Act* for the Hebron Offshore Oil Development proposal, Transport Canada has reviewed the comments received during the public review period on the Comprehensive Study Report (CSR) held from October 12, 2011 to November 14, 2011.

Transport Canada has reviewed the comments and it of the opinion that the information provided in the CSR has adequately addressed the issues identified during the public comment period. After consideration of the comments and the responses provided in the deposition table, TC has determined that the conclusion reached during the comprehensive study process and presented in the CSR remain valid.

TC looks forward to receiving the Minister of Environment's environmental assessment decision statement with respect to this project. If you have any questions or require further information, please contact Randy Decker, Senior Environmental Assessment Officer at (709) 772-3061 or randy.decker@tc.gc.ca.

Yours sincerely,

Maurice Landry
Regional Director - Programs
Transport Canada - Atlantic Region

Environmental Stewardship Branch
Environmental Assessment & Marine Programs Division
Place Vincent Massey - 16th Floor
351 St-Joseph Blvd.
Gatineau, QC K1A 0H3

November 22, 2011 File No.: 4572-10

Mr. Max Ruelokke, P.Eng.
Chairman and Chief Executive Officer
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street
St. John's, NL A1C 6H6

Dear Mr. Ruelokke:

Re: Hebron Development Project: Letter of Concurrence Recommendation to Submit the Comprehensive Study Report for Consideration by the Minister of Environment

ExxonMobil Canada Properties Limited has proposed the construction and operation of the Hebron Offshore Oil Development Project in the Jeanne D'Arc Basin, offshore Newfoundland and Labrador. Environment Canada, together with Fisheries and Oceans Canada, Transport Canada, Industry Canada and the Canada Newfoundland and Labrador Offshore Petroleum Board are Responsible Authorities for the Project pursuant to the *Canadian Environmental Assessment Act* (the Act). All Responsible Authorities have worked together to conduct a single federal environmental assessment to fulfill their respective responsibilities under the Act.

Following a decision on October 12, 2011 by the Minister of Environment to refer the Comprehensive Study Report (CSR) for public review, federal departments published a notice setting out the date on which the CSR would be available to the public; the place at which a copy of the report could be obtained; and the deadline and address for filing comments on the conclusions and recommendations of the report. Following a review of the comments received from the public, Environment Canada is of the opinion that the disposition of received comments is satisfactory and that no alteration of the CSR is required.

As required under paragraph 23(1) of the Act, Environment Canada supports that the Canada Newfoundland and Labrador Offshore Petroleum Board, on behalf of all the Responsible Authorities, submit the CSR to the Canadian Environmental Assessment Agency so that it may be provided to the Minister of Environment for his consideration and issuance of an environmental assessment decision statement.

Yours truly,

Michael Wilson
National Director
Environmental Operations Directorate
Environmental Assessment and Marine Programs

cc: J. Corkum

Fisheries and Oceans Canada | Pêches et Océans Canada

PO Box 5667
St. John's NL A1C 5X1

Your File Votre référence

Our File Notre référence
BAB 3970-175

NOV 28 2011

Mr. Max Ruelokke
Chair and CEO
Canada-Newfoundland and Labrador Offshore Petroleum Board
5th Floor, TD Place
140 Water Street, St. John's, NL
A1C 6H6

Subject: **Response to Comments Received on the Comprehensive Study for the Hebron Development Project**

Dear Mr. Ruelokke:

As a Responsible Authority pursuant to the *Canadian Environmental Assessment Act* for the project noted above, Fisheries and Oceans Canada (DFO) has reviewed the comments received during the public input period held from October 12, 2011 to November 14, 2011.

DFO has reviewed the Disposition Table for the Public Comments on the Comprehensive Study Report pursuant to subsection 22(1) of the CEAA and is satisfied that the comments have been adequately addressed by the Regulatory Authorities. It is DFO's opinion that the Comprehensive Study and the information provided in the Comprehensive Study Report have adequately addressed the issues identified during the public comment period, as per the project scoping. After consideration of the comments, DFO has determined that the conclusion reached during the comprehensive study process (i.e. that the project is not likely to result in significant adverse environmental effects) remains valid.

It is our understanding that letters supporting the above statements will be sent to you by the other Responsible Authorities. DFO looks forward to receiving the Minister of the Environment's environmental decision statement with respect to this project. If you require further information, please contact Shawna Powell, A/Regional Manager, Environmental Assessment and Major Projects at (709) 772-7026 or Shawna.powell@dfo-mpo.gc.ca.

Yours truly,

James W. Baird
Regional Director General
Newfoundland and Labrador Region

sl/sp

Canada

Industry Canada
Spectrum, Information Technologies
and Telecommunications
55 St. Clair Avenue East
Room 909, 9th Floor
Toronto, Ontario
M4T 1M2

Industrie Canada
Spectre, technologies de l'information
et telecommunications
55 est, avenue St. Clair
Bureau 909, 9e étage
Toronto, Ontario
M4T 1M2

December 1, 2011

Max Ruelokke, P. Eng.
Chairman & CEO
Canada-Newfoundland and Labrador Offshore Petroleum Board
Fifth Floor, TD Place
140 Water Street
St. John's, NL
A1C 6H6

Re: Hebron Offshore Oil and Gas Development - Comprehensive Study Report

Dear Mr. Ruelokke:

This letter is provided in reference to the public comments received for the above noted comprehensive study report.

First, I would like to state that Industry Canada has no expertise with respect to the environmental hazards and their mitigation methods associated with the Oil and Gas Industry. We have participated as a Responsible Authority (RA) in this environmental assessment process because the project will require one or more radiocommunication licences.

With respect to the public comments that were received, we note that none of the submissions related to radiocommunications, and as a result we have no responses to offer. Industry Canada is therefore of the opinion that, from a radiocommunications perspective, the information provided in the Comprehensive Study Report adequately addresses the issues identified during the public comment period, and that the Report is therefore complete.

It is our understanding that you will forward all of the collective responses to the public comments to the Canadian Environmental Assessment Agency.

If you require any additional information or clarification, please do not hesitate to contact Steve Mills, Regional Environmental Assessment Coordinator, at (506) 851-3323.

Sincerely,

John Baggio
Regional Director
Atlantic & Ontario Region

Canada

Summary of Comments	Agency and Responsible Authorities Response
All public comments from November 13, 2011 letter from Dr. Len Zedel, on behalf of Nature Newfoundland and Labrador. Numbering added.	
1. Presentation	
It was frustrating to be faced with the comment that details would only become available or decisions would be deferred until some point in the Front End Engineering Design (FEED). It is clear that some decisions could not be made until well along in the design process however, whenever such a statement was provided it was hard if not impossible to make a judgment on the consequences because there is no final position to evaluate. For example, from page 3-112: "An evaluation of design loads on the Hebron Platform, due to the metocean environment and associated uncertainties, will be conducted during FEED, and further refined during detailed design." All that could be concluded from such a statement is that the proponent is aware of sea state and wind considerations and will adjust the design as they proceed.	Environmental Assessment (EA) is intended to occur early in the planning phases of a project before irrevocable decisions are made. Therefore, matters such as detailed design of installations cannot always be addressed in detail during the EA process. The Proponent has clearly indicated, principally in Sections 3 and 13 of the CSR, the meteorological, oceanographic and ice parameters that will inform the design of project facilities. The Responsible Authorities believe that this description is sufficient for the purpose and that no alteration of the CSR is required.
2. Project Need and Justification	
This section appeared short sighted as if there was no question that the there was a need for the project. The opening statements focus on how the Hebron project will be a major contributor to the economy of Newfoundland and Labrador. That statement is not being disputed but the economics by themselves do not justify or motivate the project. A more fundamental need (and justification) for the project is its role in	National and international energy policy is beyond the scope of the CSR. With respect to project timing, the Proponent has indicated in Section 2.1 of the CSR that conditions (e.g., the conclusion of a Benefits Agreement with the Province of NL) are favourable to proceed with the project and that proceeding on the current schedule

providing for the dependence our society has on convenient sources of energy. A discussion on the merits of how that energy is sourced is beyond the scope of the CSR but ultimately, that need motivates the project. Some comment as to the timing of the development might also be appropriate; is this really the best time to develop this resource?	will extend the life of the NL offshore petroleum industry. The Responsible Authorities believe that the purpose of and need for the project have adequately been described and that no alteration of the CSR is required.
3. Produced Water	
Produced water from an offshore oil development is a fact of life and that water must be disposed of. In the case of the Hebron project, the CSR anticipates a project total of 366 million cubic meters of produced water. If discharged into the ocean, this produced water would have an average oil content of 30 mg/L and that would introduce a total of 13,000 cubic meters of oil into the environment (or 80,000 bbl in industry units). That is a lot of oil and if introduced all at once as an oil spill it would be a very major environmental catastrophe. Introduced as produced water it represents a chronic source of oil pollution that raises concerns over long term environmental effects. For this reason it is pleasing to see the proponent's commitment to re-injecting the produced water. It is understood that a final decision on this matter is impossible until somewhat into the project when a better understanding of the reservoir chemistry is possible. However, by deferring that final decision, it is necessary to consider the environmental impact of this development assuming that produced water will not be reinjected. In addition to the issue of oil in produced water, it is important to recognise that produced water contains a cocktail of chemicals including (low level) radioactive constituents. And, it is not clear if the regulated oil-water-concentration applies to the more soluble aromatic hydrocarbons including benzene, toluene, and the xylenes which are the more toxic constituents. The concentration and	Notwithstanding the Proponent's commitments respecting the re-injection of produced water, the CSR evaluates the potential environmental effects of discharged produced water, as if re-injection were not feasible throughout the project, and all produced water discharged to the marine environment, treated to the current minimum standard, the December 2010 *Offshore Waste Treatment Guidelines* co-published by the Offshore Boards in NL and NS and by the National Energy Board. This evaluation (see, for instance, CSR subsection 7.5.2.2) includes consideration of the aromatic hydrocarbon components mentioned in the comment. The Responsible Authorities believe that the assessment of potential environmental effects of the discharge of produced water is sufficient and that no alterations to the CSR in this respect are required.

component make-up of produced water is different for different oil reservoirs and will even change over the production life of the field. These factors make prediction of the impact difficult. Re-injection is the best way of keeping these pollutants out of the ocean environment: we strongly encourage the proponent's initiative in this stated commitment. --- With regards to monitoring of produced water, the proponent has clearly acknowledged requests for more timely information concerning the flow of produced water. Table 5.2 indicates under "monitoring" one of the comments that was received was the request "Provide public access to 24-hour monitoring raw data for produced water and other waste streams". Information on this issue is indicated in chapter 15, but chapter 15 only notes that EMCP will adhere to all regulatory requirements. From that statement it is not clear if EMCP has really responded to the input or simply continued with the business as usual approach of only releasing that information that is required by legislation. --- In the Hebron Project Produced Water Management Strategy (page 13) it is stated that "PW treatment is inherently difficult to predict, and the system has been designed based on the limited information and well samples available. Upset conditions, and operations learning-curve periods can be expected, particularly during early operations." It would be particularly reassuring to know if these upset conditions lead to any environmental impact. The present Environmental Effects Monitoring programs implemented on the Grand Banks do nothing more than record the events (and details of those events are not	The Proponent has not, to date, volunteered the release of compliance monitoring data beyond that required by legislation. As described in Section 15 of the CSR, an Environmental Effects Monitoring (EEM) program will be required for the project. The EEM program is intended to determine and quantify project-induced change in the surrounding environment. If such change occurs, the EEM program enables the evaluation of effects and, therefore, assists in identifying the appropriate modifications to, or mitigation of, project activities or discharges. The scope of the EEM program will include consideration both of "routine" discharges and upset conditions. The Proponent has committed to consulting public stakeholders, as well as the scientific and government

generally made public). There is no attempt to validate the environmental impact of these events.	community and regulatory agencies, in the development of its proposed EEM program. The Responsible Authorities believe that the description of monitoring programs in the CSR is adequate and that no alteration to the CSR in this respect is required.
4. Operational Discharges	
Produced water is by far the largest of the operational discharges but there are other waste discharges including displacement water, deck drainage, ballast and bilge water. These latter operational discharges are regulated to have oil-in-water contents of less than 15 mg/L. This concentration limit complies with Annex I of the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78). We find it ridiculous that these smaller quantity discharges have more stringent oil-in-water limits than the 30 mg/L specification for produced water. It is clear that the regulations are not dictated by environmental safety but rather by technological limitations. Here again we can only hope that reinjection of produced water becomes a practical reality for the Hebron field.	The CSR evaluates the potential environmental effects of discharges within the expectations of the December 2010 *Offshore Waste Treatment Guidelines* and concludes that significant adverse effects associated with these discharges are unlikely. The Responsible Authorities are satisfied that this evaluation is adequate. The Responsible Authorities also believe it appropriate that the treatment of each discharge be considered on its individual merits, and not be assigned lesser expectations simply because a higher-volume discharge with greater technical treatment challenges may exist.
5. Chronic Spills	
We recognise the industry's efforts to control chronic spills; such spills can be minimised but never completely eliminated. Even small spills are of concern primarily because of the impact that they can have on birds at the water surface. Along with actual spills, the variations in performance of oil-in-water separators can also result in harmful discharges. To date, the industry has monitored the accidental spills by recording	The CSR considers potential environmental effects due to accidental oil releases, including those of smaller volume (see, for example, subsection 9.5.4.3). The Responsible Authorities do not believe alterations to the CSR are required in this regard.

their events. For example, the CNLOPB records for the Newfoundland offshore industry from 1997 to 2010 as published in table 14-13 of the CSR are 2923.5 L of spills less than 1 bbl (159 L), and only 62.83 L in spills of less than 1 L. Recording the existence of these spills is valuable and would identify areas of operation that could be improved but it does nothing to measure the impact of those spills on the environment. --- As has already been mentioned, the key issue for these small spills is the occurrence of surface slicks that could impact birds. It would be ideal if there were some automated means of detecting surface slicks because that would allow effective continuous monitoring of the important environmental effect. In the absence of such technology, the only effective monitoring means would be to place trained and dedicated observers on the operating platform.	The Responsible Authorities note that offshore operators are required to report all spills to the C-NLOPB in accordance with the *Atlantic Accord Act* and its associated regulatory framework. The C-NLOPB publicly reports all spills greater than one liter by Operator and facility, and spills less than one liter in aggregate, on its website. C-NLOPB is satisfied that the existing reporting requirements are working as intended and is aware of no evidence that they are being contravened. Therefore, there is no evidence to indicate that requiring the placement of additional third-party personnel onboard offshore installations would improve reporting effectiveness. There are two additional, independent means of detecting discharges of oil at sea in Atlantic Canada. The federal National Aerial Surveillance Program (NASP) uses aircraft to detect spills from vessels and offshore platforms. The NASP's three recently-modernized aircraft are the primary means of monitoring shipping activities and detecting illegal discharges in all waters under Canadian jurisdiction. In addition, Environment Canada's Integrated Satellite Tracking Of Pollution (I-STOP) program is a satellite surveillance program for the detection of possible discharges of oil due to marine

	transportation and offshore oil production. I-STOP uses satellite radar image information to direct surveillance aircraft to suspected marine pollution incidents to ascertain if there is an oil spill. The radar can acquire imagery at night or during foggy conditions.
6. Tsunami Risk	
The potential for damage associated with a large tsunami has been made all too obvious by the tsunami in March of this year that struck Japan and the tsunamis in the Indian Ocean in 2004. The proponent argues that tsunami risks are "low" based on the low seismic activity characteristic of the Newfoundland and Labrador region and by noting the one recorded tsunami event of 1929. We agree in principal that tsunami risks are "low" (not knowing exactly what that means) but we do believe that the proponent could firm up this assertion and attend to some details that they have overlooked. First, tsunamis do not always originate in the region which they devastate: in fact there are many incidences of damage caused by tsunamis originating on the other side of an ocean. As an example, consider tsunamis caused by the 2004 Indian Ocean earthquake that impacted countries on both sides of that ocean. The Atlantic Ocean does not have a great deal of tsunamigenic seismic activity but it would be valuable to quantify this fact. Importantly, the Canary Islands have been identified as a potential source for a large tsunami affecting the Atlantic Ocean. Tsunamis are not always caused by seismic activity. For example, volcanoes and land slides have been known to cause tsunamis. Important to the Newfoundland region is the formation of tsunami like waves by the rapid passage of low pressure areas over shallow seas. This process caused damage to various towns along the Newfoundland	With respect to tsunamis, the Responsible Authorities believe that the CSR has adequately considered potential risk to both onshore and offshore activities (see subsection 3.1.2.3 and 13.3.3, and subsections 3.2.2.4 and 13.4.3, respectively) and that no alterations to the CSR are required. The Responsible Authorities note that at the offshore site the effects of barotropic waves are expected to be almost negligible, due to low amplitudes in those water depths and the design of offshore structures for much larger waves associated with 100-year storm conditions. For the nearshore area, the most probable barotropic wave amplitude would be between 0.5 and 1.5 metres above higher high tide level, which is of the same order of magnitude as that considered for storm surge in the area (0.88 metres). The Responsible Authorities believe that, in consideration of the above, and the relatively short duration of nearshore operations, the assessment in the CSR is sufficient and that no further alteration to the CSR is required.

coast in1999 and 2000 and that risk should be given due recognition. (See Mercer et al., 2002: Barotropic waves generated by storms moving rapidly over shallow water. Journal of Geophysical Research 107:C10, Online publication date: 1-Jan-2002.). The importance of waves of this origin should be evaluated. One last factor regarding the risk associated with tsunamis is that being located well into a deep bay may not provide total protection from damage. The important Canadian experience with this danger is provided by the 1952 Tsunami that struck Port Alberni (located at the end of a 50 km long fjord).	
7. Light Pollution	
Light pollution in the offshore region is a concern. The CSR addresses this issue noting that birds in general and Leach's Storm-Petrel in particular will be attracted to lights and any flares. The CSR notes that any impact will be mitigated: from page 9-64: "The stranding of birds at offshore platforms is largely mitigated by bird handling and release protocols so that any cumulative environmental effects, if they occur, would be low and not significant." Can this statement be truly substantiated? Surely this mitigation is only effective for those birds that have been fortunate enough to fall onto a horizontal surface, those that land in the water are less fortunate. What proportion of the affected birds is actually identified? Cumulative impact here is not just the extended presence of one artificially lighted structure. It is the occurrence of four such structures contained within a ~50 km radius. What is the cumulative impact of this network of illuminated structures. What is the effective area of impact?	The Responsible Authorities agree that light pollution is a concern with regards to attraction of birds to lights and flares. In light of current knowledge of bird strikes associated with lighting on offshore platforms, the Proponent committed (see subsection 9.5.7 of the CSR) to the development and implementation of a research monitoring program at the Hebron field location, which will be designed and conducted by an independent third party. This program will be designed to provide information regarding potential interactions between pelagic seabirds and the Hebron platform, but also should provide additional data to allow assessment of risk and mortality regarding potential seabird attraction to offshore structures generally. The program design would be developed in consultation with Environment Canada's Canadian Wildlife Service, and would be completed prior to platform start-up in 2017. It is anticipated that field testing would begin upon completion of platform start-up and commissioning activities offshore.

	The Responsible Authorities believe that the assessment of potential seabird attraction in the CSR, and the Proponent's commitments described therein, are adequate and that no further alteration of the CSR is required.
8. Noise Pollution	
For the most part there is nothing outstanding in the offshore component of this proposal with regard to the generation of sounds. Seismic surveys are likely the most significant sound source generating high levels of low frequency sound that will be detectable by some animals for 100's of km. The proponent expresses a commitment to operate seismic surveys applying industry standard mitigations which for the most part address issues of impact to individual animals. These sound sources are operated continuously for weeks at a time when seismic surveys are underway and therefore they represent an alteration to the acoustic environment over a large area of the Grand Banks. The degree to which this noise impacts the environment is not clearly understood and so it is an area of concern.	The potential environmental effects of marine seismic surveys are discussed in the CSR (see, for example, subsection 7.5.1 respecting fish, and subsection 10.5.1 respecting marine mammals and turtles). The Responsible Authorities believe that the discussion is sufficient and that no further alteration to the CSR is required.

In the near-shore area of operation, there may be periods of time when high levels of noise are generated by pile-driving operations and/or underwater blasting. [. . .] One component of the noise pollution management program that we would like to see more commitment to would be the practice of planning any pile driving or blasting operations for those times of the year when sensitive animals are less likely to be present in Trinity Bay.	The Proponent has committed in the CSR to "No detonation of explosive that produces, or is likely to produce, a peak particle velocity greater than 13 mm/s in a spawning bed during the period of egg production" and "A trained observer will monitor a designated radius near pile driving (and blasting) activities for at least 30 minutes prior to activation of the pile driver. Acoustic modeling will be conducted prior to construction activities in the Nearshore Project Area to reflect actual pile driving scenarios.
9. Environmental Management	

ExxonMobil is a large corporation with a well established structure for regulating environmental impacts. Chapter 16 of the CSR provides details on the principles and policies that make up the ExxonMobil Environmental Policy. We have to agree with the intentions of this Policy; only by fostering a culture of environmental sensitivity is it possible to achieve an environmentally sensitive operation. We look forward to seeing this successfully realized as the Hebron project proceeds.	The Responsible Authorities note that this comment is general in nature and is directed to the Proponent. No alteration to the CSR is required.
10. Independent Observers	
250 km to the east of St. John's there will soon be a fourth large industrial installation. Everyone in the Province can clearly see the favourable economic impact of that industry. But from St. John's, aside from the coming and going of supply ships, it is not possible to see any trace of that heavy industry; out of sight, out of mind. It is critical that we put in place safeguards to assure that the environmental integrity of the Grand Banks is maintained. This oversight is needed to protect the renewable resource that is represented by the commercial fisheries and also to protect the ecosystems that the Grand Banks support. At present, there is no direct and independent observation of the offshore industry. We would like to believe that such monitoring is not required, that between the industry itself, the CNLOPB, and the environmental effects monitoring programs there is no concern. But, as long as the industry refuses to allow independent observers on oil production facilities, we will wonder why they are not allowed? In the past when requests for observers have been made it has been pointed out by operators that this is not possible; there is insufficient room on the platforms, it is too expensive, observers would have to be trained. All of these reasons are just excuses because any of these	The Responsible Authorities note that this comment is directed to the Proponent. No alteration to the CSR is required.

points could be addressed especially when identified at the early project design stages. Here we see an opportunity for ExxonMobil to demonstrate an increased level of openness and a commitment to environmental monitoring and protection.	