

Environmental Assessment of EMGS's Eastern Canada CSEM Program, 2014-2018:
Amendment (LGL Limited January 2015)

Canada-Newfoundland and Labrador Offshore Petroleum Board

§1.0 Introduction, 2nd para, last sentence, pg 1 – *“This Amendment was approved....activities in 2014”* is not an accurate statement. A determination was made on this Amendment by the C-NLOPB on November 28, 2014.

§2.2 Project Overview, 6th para., 2nd sentence, pg 4 & Table 2.1, pg 5 – *“if required”*. EMGS has previously committed to marine mammal monitoring. It is expected that marine mammal and seabird observers, as per the *“Geophysical, Geological, Environmental and Geotechnical Program Guidelines (C-NLOPB 2012)”* will be on board the vessel. This would be consistent with the 2014 program.

§3.0 Potential Effects of Project Activities on the Environment, pg 6 – As per DFO's comment regarding the temporal window in 2014 extended to allow retrieval of the EM receivers from the ocean floor rather than extension of the actual CSEM survey and/or deployment of CSEM energy. The effects of the extension of the actual CSEM survey and/or deployment of CSEM energy was not assessed in the 2014 EA Amendment and should be included in this EA Amendment.

§3.2 Cumulative Effects, pg 8 – As per FFAW's comment, confirmation is required that the changes in the project that are proposed in this Amendment were assessed in the original EA Report. The sections where these activities were assessed should be provided.

Environment Canada

EC's previously submitted comments are still applicable. In addition, the proponent should be advised that the two vessels operating that late in the year (Nov-Dec) may interact with SARA-listed Ivory Gull foraging on pack ice.

December is a bit early in the year for pack ice to be encountered, and it is our understanding that these ships are not ice-rated and so would be avoiding such areas. It would thus still be considered an uncommon occurrence to interact with Ivory Gull, but EC-CWS recommends that the observers monitor for that species (Ivory Gull) during daylight operations during December, if operating anywhere near pack ice formations.

EC would like to remind the proponent to send any seabird reports and data annually to CWS.

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Fisheries and Oceans Canada

§1.0 Introduction (page1) and Section 3.0 Potential Effects of Project Activities on the Environment (page 6) – It should be noted that the extension of the temporal window in 2014 from 30 November to 31 December as described in the first EA amendment was to allow retrieval of the EM receivers from the ocean floor rather than extension of the actual CSEM survey and/or deployment of CSEM energy.

Table 2.1 (page 5) – with respect to primary mitigations in relation to “Temporary disturbance of Species at Risk” the table notes *“If required, use qualified observers to monitor for Ivory Gull, white shark, marine mammals and sea turtles during daylight EM surveys”*. The *“If required”* qualifier for this mitigation is not in keeping with the EA amendment provided in June 6, 2014 which notes (on page 21) that “...the observers will watch for shark, marine mammals and sea turtles when the source is active during daylight periods..”. This commitment should be clarified.

§3.0 Potential Effects of Project Activities on the Environment (page 6) – it is interesting to note based on information presented in the original project EA that marine mammal sightings have generally been lower during the month of December compared to other months, and historical data for commercial fisheries in the Study Area appear to be lower in the month of December compared to other months.

§3.1 Residual Effects Assessment Summary – 1st sentence replace “..seismic survey...” with “...CSEM survey...)

Department of National Defence

MARLANT Safety and Environment (MARL SE) has the following comments:

- Please identify a specific individual or office to serve as a Point Of Contact (POC) for MARLANT queries and concerns;
- Please ensure the appropriate Notice to Mariners will be issued for all underwater activities and any significant surface ventures, such as use of flares, buoys, and unconventional night lighting;
- Please ensure the appropriate Notice to Airmen will be issued for all activities that could affect air safety, such as use of balloons, Unmanned Aerial Vehicles (UAVs) or tethered airborne devices; and
- Please ensure engagement of CTF 84, through Director General Naval Strategic Readiness (DGNSR), to ensure de-confliction with possible Allied submarine activities.

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FFAW/Unifor

Prior to receiving this Environmental Assessment Amendment for review, FFAW-Unifor is not aware of any consultation process since the preparation for the 2014 survey activities. It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program has seismic vessels operating within active harvesting areas and other petroleum exploration projects. The Petroleum Industry Liaison with FFAW-Unifor is available to assist in arranging consultation sessions specifically aimed at those active within the fishing industry.

§3.2 Cumulative Effects, pg 8 – It is apparent that the first sentence is a remnant of a copy and paste process from an amendment to another company's Environmental Assessment.