

From: NG
Sent: Thursday, June 01, 2017 5:12 PM
To: Hicks, Darren
Subject: RE: GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey for the Labrador Shelf Area, 2013 to 2015

Dear Mr. Hicks,

Please find below our comments with respect to GXT's response to our comments on their LabradorSPAN 2D Seismic, Gravity and Magnetic Survey EA Amendment. We received this response on May 17, 2017 and are providing comments as requested prior to close of business on May 24, 2017.

The Nunatsiavut Government continues to question the logic behind amending an environmental assessment (EA) that has clearly gone beyond the scope of the original environmental assessment. A fully revised EA should be required by the C-NLOPB.

The Nunatsiavut Government is not supportive of the change in timelines and extension of the project area within the amendment. The NG finds that the temporal and spatial scope within the amendment deviate from the original environmental assessment to such a degree that it is no longer valid, and finds the assessment provided in the amendment to be inadequate to assess impacts to valued ecosystem components and cumulative impacts. The original EA was assessed for a maximum of 3 years of seismic activity; this amendment is asking for a maximum of five years, including the year already completed. The request to almost double the amount of seismic activity over this time is also a major scoping change and should require a new EA.

The practice of allowing a proponent to define its project area as the entire Labrador Shelf Area does not allow for proper, specific assessments of smaller project areas (as is typical in other jurisdictions). In addition, it makes assessing cumulative effects more difficult for other proponents as they cannot assess the impacts of this type of project in conjunction with their own. For these reasons and the others cited above, the Nunatsiavut Government encourages the reassessment of this project, in addition to the narrowing of the project area to a more specific spatial scope.

Thank you,

From: Hicks, Darren [mailto:DHicks@cnlopb.ca]
Sent: Monday, May 29, 2017 2:29 PM
To: NG
Subject: RE: GX Technology Canada Ltd. 2D Seismic, Gravity and Magnetic Survey for the Labrador Shelf Area, 2013 to 2015

Good afternoon: could you please indicate when a response to the attached may be provided? A response was due May 24, 2017.

“Good day All: please see the attached responses from GXT Canada to your comments on their proposed Amendment. Please respond by close of business May 24, 2017 if the responses are satisfactory. If you have any questions please feel free to contact us.

Further details on this project may be found at <http://www.cnlopb.ca/assessments/gxtc.php>

Regards
Darren”

Regards
Darren

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