

From: Bret Pilgrim  
Sent: Wednesday, May 8, 2019 1:15 PM  
To: Hicks, Darren  
Cc: Cathy Andrews  
Subject: RE: GX Technology Canada Ltd. GrandSPAN Marine 2d Seismic Gravity and Magnetic Survey 2014-2018

Good afternoon Darren,

We have reviewed GXT's GRANSPAN 2 Seismic, Gravity and Magnetic Survey and have no comments/concerns with the amendments to the temporal and spatial scope of the EA. However, we have a couple specific comments on the Report.

Review Comments:

Section 2.4 Project Area (page 2.3): Regarding the statement, "...the amended (extended) portion of the Project Area is more than 400 km from Newfoundland or Labrador mainland and outside Canada's EEZ...", it appears from Figure 2-1 that the extended area lies "within" Canada's EEZ.. Is this a typo?

Section 4.1.1.1 Significant Benthic Areas (page 4.1) and Section 4.4.1.3 DFO EBSAs on the Maritimes Bioregion (page 4.48): There is mention of a large significant benthic area for sea pens located in the Laurentian Channel, which overlaps with the Original and Amended Study Area. The Laurentian Channel AOI was recently designated as an Oceans Act Marine Protected Area (MPA). The Laurentian Channel MPA Regulations (currently accessible on Canada Gazette II) prohibits carrying out "any activity in the Marine Protected Area that disturbs, damages, destroys or removes from the Marine Protected Area any living marine organism or any part of its habitat or is likely to do so". This prohibition includes all Oil & Gas Activities and seismic surveys. Updated information on this newly designated MPA should be included in the EA Amendment.

Section 4.1.1.3 Species at Risk (page 4.5): Regarding reference to the Recovery Strategy for Northern and Spotted Wolffish (DFO 2018) and implementation of critical habitat, it should be clarified that the recovery strategy and critical habitat are "proposed" as they are not finalized.

Section 4.4.2 Environmental Effects Assessment (page 4.51): Regarding the statement, "There are no known prohibitions of marine activities, such as those being proposed as part of the Project, within the protected and sensitive areas described in the original EA Report, 2018 EA Update, and above in section 4.4.1.". Updated information on the Laurentian Channel MPA's prohibitions on oil and gas activities, including seismic activities, should be discussed.

Section 4.3 Marine Mammals and Sea Turtles (page 4.42): With respect to new or updated information, in addition to the David Strait - Baffin Bay - Labrador Sea population of Northern Bottlenose Whale in the project area, the Project EA Amendment should note that recent work

in the Flemish Pass area has highlighted the potential presence of the Scotian Shelf population of Northern Bottlenose whale listed in the Species at Risk Act public registry as endangered, and the implications of such relative to mitigation measures set out in the Statement of Canadian Practice. As a precautionary measure, it is recommended that seismic surveys be shut-down if Northern Bottlenose Whales are encountered within the safety zone due to the uncertainty of the exact range of these populations.

If there are any questions, please let me know.

Thanks,

Bret  
Bret Pilgrim  
Sr. Biologist – Coastal, Marine, Oil and Gas Regulatory Review  
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From: Hicks, Darren <DHicks@cnlop.ca>  
Sent: April-25-19 3:04 PM  
To: Bret Pilgrim; Jerry Pulchan; Carol Lee Giffin; Shelley Ball; Joanne Sweeney; Tom Dooley; Chris Carter  
Cc: Melissa Moss  
Subject: RE: GX Technology Canada Ltd. GrandSPAN Marine 2d Seismic Gravity and Magnetic Survey 2014-2018

Good day All: please see the attached temporal and spatial amendment from GXT concerning this program. The C-NLOPB request that you review the enclosed EA Amendment and provide comments no later than May 9, 2019. If no response is received from you by that date, the C-NLOPB will assume that you have no comments.

If you have any questions regarding the EA Amendment, you may contact me (709-778-1431 or [dhicks@cnlop.ca](mailto:dhicks@cnlop.ca)).

Regards  
Darren  
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