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**KEITH SULLIVAN**  
*President*

**DAVID DECKER**  
*Secretary-Treasurer*

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Wednesday, September 30, 2015

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> Floor, TD Place  
St. John's, NL A1C 6H6

**Re: Hibernia Management and Development Company Ltd. 2D/3D/4D  
Seismic Projects for the Hibernia Oil and Gas Production Field, 2013 to  
Remaining Life of Field Amendment**

Mr. Hicks,

Thank you for providing the Remaining Life of Field Program Amendment for HMDC for further review by FFAW-Unifor. The changes to the document do not address the concerns expressed related to the towing of gear ahead of the seismic vessel. As well, as this addition to the program was introduced late in the fishing season our comments were focused on fishing activities that would occur at that point in 2015.

We recommend direct consultation with the proponent on this added scope if the company is still planning on towing the profiler behind a chase boat in future years. It is our understanding that this component did not occur in 2015. Therefore it would be prudent to consider the full context of the fishery going forward. Consultations with fishing interests should be planned before or within the first quarter of the year, prior to the start of the typical fishing year.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison