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Tuesday, July 14, 2015

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

Re: Data Acquisition and Seabed Sampling for Basin Modelling, Labrador Offshore to the Jeanne d'Arc Basin (2015-2024) – Environmental Assessment

Dear Darren,

Thank you for providing FFAW-Unifor with the opportunity to comment on the Environmental Assessment for MG3 (Survey) UK Limited's Data Acquisition and Seabed Sampling for Basin Modelling, Labrador Offshore to the Jeanne d'Arc Basin (2015-2024).

Overall the report is concise and provides adequate information regarding the program. I would however appreciate clarification on a couple of points.

Looking at Table 5.1 it is almost identical to that which was Table 5.1 in an Environmental Assessment submitted in 2014 by TGS-NOPEC. The consultant is the same as is the work to be undertaken. Yet there are differences in what is being considered in Project-Valued Environmental Component Interaction. It is not expected for the proponent to rationalize the inclusions and considerations in an EA from 2014, but it would be pertinent to be advised of the difference in interactions.

In Section 5.5 please provide clarification on the statement "...and a fishing gear damage compensation program (as per C-NLOPB and C-NSOPB 2002) ..., in the event of an oil spill."

It is paramount that MG3 ensures that the equipment used for seabed sampling is safely secured. Failure to do so and losing the equipment would result in a hazard for fishing vessel towing gear on the seabed.

I would like to thank you for the opportunity to provide input on this environmental assessment. Please do not hesitate to contact me at any time if you require further information.

Sincerely,

Robyn Lee
Petroleum Industry Liaison
FFAW-Unifor

