



July 9, 2015

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

Attention: Darren Hicks

Re: Review of the Amendment to the Environmental Assessment of the MultiKlient Invest AS  
Northeast Newfoundland Slope Seismic Survey, 2012 – 2017

Dear Mr. Hicks:

This letter provides MultiKlient Invest AS's response to the C-NLOPB consolidated comments provided in the review of the 3D Amendment for con current vessels to the Environmental Assessment of the 2D Seismic Survey on the Northeast Newfoundland Slope in your email dated July 8,, 2015. See MKI comments below;

**Canada – Newfoundland and Labrador Offshore Petroleum Board**

**Section 1 Introduction, Figure 1, pg 3** – The legend identifies green areas as "Countries".  
Please explain.

***MKI Response: The legend should identify green areas as "Land".***

**Section 3 Potential Effects Assessment and Mitigation, Table 1, VEC - Marine Mammals/Species at Risk/Critical Habitats & Mitigation – Adherence to the ...the Marine Environment, pg 7** –Section I of Appendix 2 of the "*Geophysical, Geological, Environmental and Geotechnical Program Guidelines*" (C-NLOPB 2012) contains verbatim the *Statement of Canadian Practice with Respect to the Mitigation of Seismic Sound in the Marine Environment (C-NLOPB 2012)*. Appendix 2 contains **all** recommended environmental planning, mitigation and reporting measures for marine seismic surveys in the NL offshore area, including recommended practices for interaction with other ocean users, particularly fisheries interests, during the conduct of surveys and recommended reporting formats.

***MKI Response: Understood, MKI follows the "Statement of Canadian Practice with Respect to the Mitigation of Seismic Sound in the Marine Environment (C-NLOPB 2012) and appendix 2 of the Geophysical, Geological, Environmental and Geotechnical Program Guidelines".***

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**Section 3 Potential Effects Assessment and Mitigation, Table 1, VEC - Marine Mammals/Species at Risk/Critical Habitats & Mitigation – *If a concentration of marine mammals is observed in a particular area, the survey can shift to another part of the Study Area until the concentration has moved away, pg 7*** – Seismic survey activities can only occur within the “Project Area” not the “Study Area”.

***MKI Response: The above should read .....the survey can shift to another part of the project Area. MKI understands that seismic activities can only occur within the “Project Area”.***

**Environment Canada**

All mitigations agreed to in the environmental assessment must apply to both vessels, including having seabird observers on each ship and performing checks for stranded birds on each ship. In addition, the proponent must be ensured that as described in the amendment, the ships will not be operating in close proximity to each other.

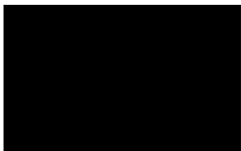
***MKI Response: MKI confirms Marine Mammal Seabird Observers will be onboard each ship and perform checks for stranded birds. MKI also confirms that the vessels will not be operating in close proximity to each other.***

**Department of Fisheries and Aquaculture (Government of Newfoundland and Labrador)**

It is noted under chapter 6 Consultations it references the FFAW being familiar with the planned activity. The offshore fishing sector represented by GEAC and CAPP should also be made familiar with the project activity.

***MKI Response: In addition to FFAW other fisheries organizations have been consulted and are invited to participate in our weekly update meetings and to also receive daily communications on our vessel activities. Further to this, One Ocean who liaise with the offshore fishing sector represented by GEAC and CAPP have been provided information on our season’s activities and receive twice daily communications on current vessel activities.***

Kind regards,



Vice President North America MultiClient

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