

Environmental Assessment of MKI's Northeast Newfoundland Slope Seismic Program, 2012-2017: Amendment (Keel HSE Management Inc. February 13, 2015)

Canada – Newfoundland and Labrador Offshore Petroleum Board

The Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment (SOCP) specifies the mitigation requirements that must be met during the planning and conduct of marine seismic surveys in order to minimize impacts on life in the oceans. These requirements are set out as minimum standards to be implemented during the planning and conduct of seismic programs. As such, it is advised that the proponent adhere to all relevant minimum mitigations outlined in the SOCP. It should be confirmed by MKI that all environmental planning, mitigation and reporting measures for marine seismic surveys, as recommended in Appendix 2 of the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB January 2012) will be met.

Section 1.3 Stakeholder Engagement, pg 4 – The outcome of the stakeholder consultation should be provided.

Table 4.2, pg 14 – “Internal MKI planning between 2D and 3D crews” is identified as a mitigation measure in the event of other geophysical programs. Specifically, how will MKI address two seismic vessels conducting activities in the vicinity within the proposed timeframe.

Environment Canada

The CWS notes that the findings and mitigations regarding migratory birds from the initial project review are still valid and applicable. Environment Canada's comments on other environmental issues from the initial project review remain applicable.

Fisheries and Oceans Canada

Table 3.1 Mitigation for Marine Mammals/Species at Risk, and Sea Turtles (Page 10 and 11) – within the description of Mitigation and specifically with respect to adherence to the “Statement of Canadian Practice on the Mitigation of Seismic Noise in the Marine Environment” it is noted that adherence to same would be “..to the extent reasonably practical..” It is not clear what is meant by this statement. The EA amendment should provide clarification noting circumstances where adherence to the Statement of Canadian Practice is not practical, the possible effects of not doing so and whether other measures would/should/could be implemented to reduce risk of seismic noise to marine mammals, species at risk and/or sea turtles under such circumstances.

It is noted in the amendment (Section 2.1.3.1 and Table 2.1 – page 5) that while the sound source array volume and many other features of the 2D and 3D surveys are similar, the 3D survey will deploy 10-16 recording streamers and cover a greater area (1.5 – 2.4 km wider) than the 2D survey streamer. While it is noted that the 3D survey

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will occupy greater space in the water column and increase potential for spatial interactions and the duration of underwater sound, Section 3 and Table 3.1 does not appear to recognize or describe the potential effects of increased interaction between the 3D survey equipment and identified marine VECs – marine mammals, species at risk, sea turtles, fish and fisheries. This should be clarified.

Department of National Defence

Please identify a specific individual or office to serve as a Point of Contact (POC) for MARLANT queries and concerns;

- Please ensure the appropriate Notice to Mariners will be issued for all underwater activities and any significant surface ventures, such as use of flares, buoys, and unconventional night lighting;
- Please ensure the appropriate Notice to Airmen will be issued for all activities that could affect air safety, such as use of balloons, Unmanned Aerial Vehicles (UAVs) or tethered airborne devices; and
- Please ensure engagement of CTF 84, through Director General Naval Strategic Readiness (DGNSR) (Point of Contact for: LCdr Hopkins, DNSO SSO Readiness. Tel: 613-945-0652), to ensure de-confliction with possible Allied submarine activities.

FFAW/Unifor

There is not specific mention and consideration of mitigations for fisheries sciences apparent in this Amendment submission. The 3-D Seismic activity does have a greater challenge of mitigation and intensity of exposure, yet there is no mention of this being fully re-evaluated in the considerations for the Valued Environmental Components.

It is of utmost importance that the proponent diligently pursues the consultation process with all other ocean users. This is especially of importance as this program has seismic vessels operating within active harvesting areas. The Petroleum Industry Liaison with FFAW|Unifor is available to assist in arranging consultation session specifically aimed at those active within the fishing industry.