



July 22, 2015

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

For the attention of Ms. Elizabeth Young

Dear Elizabeth,

Re: Amendment to EA for Waste Management on NE Newfoundland Slope Program

This letter serves as an amendment to MKI's Northeast Newfoundland Slope Seismic Program 2012-2017 Environmental Assessment (EA) (YOLO Environmental Inc. 2012). Further to the meeting between Mr. Dave Burley of the C-NLOPB and Neil Paddy of MKI on July 10 2015, MKI respectfully requests that this amendment be applied to the aforementioned EA.

This amendment provides new information on how waste management will be conducted on seismic and support vessels during MKI's seismic program on the northeast Newfoundland slope, as well as an assessment of the effects of this waste management approach on the Valued Environmental Components (VECs) identified in the EA. This amendment will provide consistency with the way waste management is conducted on other authorized MKI seismic programs in Newfoundland and Labrador.

MKI is currently working in the Flemish Pass Basin under program authorization No. 45120-020-0011 with the approved vessel Ramform Valiant and also in the Orphan Basin under program authorization No. 45120-020-0012 with the approved vessel Ramform Viking.

The text in Section 2.5.4 of the EA currently reads as follows:

2.5.4 Solid Waste

All solid waste will be transferred to shore and disposed of at an approved facility. Any hazardous materials (e.g., oily rags) will be handled separately in hazardous materials containers. Sanitary and food wastes will be macerated to a particle size of 6 mm or less and then discharged as per the OWTG.

The above text is to be replaced with the following:

2.5.4 Waste Management

Wastes produced from the seismic and support vessels, including hazardous and non-hazardous waste material, will be managed in accordance with MARPOL and with the vessel-specific waste management procedures. All solid wastes will be sorted by type,

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compacted where practicable, and stored on board before disposal to an appropriate certified reception facility. Non-toxic combustible material and waste oil from the vessels will be burned on-board in approved incinerators. The shipboard incinerators will have been examined and tested in accordance with the requirements of the shipboard incinerators IMO Res. MEPC 76(40) for disposing of ships-generated waste appended to the Guideline for the Implementation of Annex V of MARPOL 73/78. Sufficient and adequate facilities will be available on vessels to store solid wastes to the extent required. The MKI waste management procedures will be filed with the C-NLOPB. Only ports with licensed waste contractors will be used for any waste returned from offshore.

While there is potential for interaction between waste management activities and all VECs identified in the EA, all wastes produced from the seismic and support vessels, including hazardous and non-hazardous waste material, will be managed in accordance with MARPOL and the vessel specific waste management plans. The appropriate handling and treatment of waste produced by the Project will result in minimal effects on the valued environmental components.

Generally, with the application of the mitigation measures (e.g., accordance with MARPOL, approved incinerators), the **reversible** residual effect of waste management on all VECs identified in the EA will have **negligible** magnitude (criterion rating = 0), a **<500 m** geographic extent (criterion rating = 2), a duration of **days** (criterion rating = 1), and an **intermittent** frequency (criterion rating = 2).

Based on the criterion ratings indicated above, the residual effect of waste management on all VECs during MKI's Northeast Newfoundland Slope Seismic Program 2012-2017 is predicted to be **not significant**. The degree of confidence in this prediction is **high**.

We would like to commence this amendment to our EA as soon as possible and appreciate your assistance with this matter. Should you require any further information or have any questions I would appreciate if you would contact [REDACTED] on email at [REDACTED] or at his office [REDACTED]
[REDACTED]

Yours faithfully

[REDACTED]
Vice President
North America, MultiClient