

From: Keats, Kimberley F <Kimberley.Keats@dfo-mpo.gc.ca>
Sent: Thursday, March 19, 2020 2:17 PM
To: Hicks, Darren
Subject: RE: Multiklient Invest Newfoundland Offshore Seismic Program, 2018 to 2023

Hi Darren,

We've reviewed the EA Amendment in support of MKI's request to remove the specific 7-day/30-km temporal/spatial buffer from the mitigation protocol for snow crab. MKI has indicated that the 7-day/30-km temporal/spatial buffer is operationally impractical; however, we note that the same mitigation measure is in place for two other current seismic projects (Seitel, CGG). It is unclear why the specific buffer was developed, although it may have been selected for consistency with mitigations for the DFO RV survey (see p. 133 of CGG's EA).

While MKI has committed to working cooperatively with the FFAW\Unifor and DFO through communication channels, the EA Amendment does not indicate whether the FFAW\Unifor is in agreement, only that, "the representative of the FFAW\Unifor acknowledged MKI's description of the rationale behind the proposed modification to the mitigation measure."

It may be useful to request additional clarity from the Proponent, specifically on the following:

- Section 2.0 Modification to Mitigation Measure (paragraph 3, sentence 2) - The Proponent states: "The rationale for the change is that the buffer is considered operationally impractical based on MKI's recent experience in the Project Area". Based on MKI's experience, what spatial and temporal buffers would be feasible for the post-season snow crab survey?

- Section 4.0 Conclusion (sentences 3 and 4) - Although ongoing communication is an important mitigation, the Proponent should clarify that they intend to develop a temporal and spatial separation plan in collaboration with FFAW|Unifor and DFO, as noted in Section 3.0.

Best,
Kim

From: Hicks, Darren <DHicks@cnlopb.ca>
Sent: Tuesday, March 3, 2020 11:48 AM
To: Keats, Kimberley F <Kimberley.Keats@dfo-mpo.gc.ca>; dfo.fpp.nl / ppp.t-n-e-l.mpo (DFO/MPO) <FPP.XNFL@dfo-mpo.gc.ca>; Pulchan, Jerry [St. John's] <Jerry.Pulchan@canada.ca>; EC FCR Tracker (FCR_Tracker@ec.gc.ca) <FCR_Tracker@ec.gc.ca>; Melissa Ginn (melissa.ginn@tc.gc.ca) <melissa.ginn@tc.gc.ca>; Sara Rumbolt (sara.rumbolt@canada.ca) <sara.rumbolt@canada.ca>; Diane Blanchard (diane.blanchard@canada.ca) <diane.blanchard@canada.ca>; CarolLee.Giffin@forces.gc.ca; 'Genest, Maximilien (NRCAN/RNCAN)' <maximilien.genest@canada.ca>; NRCAN Tracker (NRCAN.ea-spi-ee-isp.RNCAN@canada.ca) <NRCAN.ea-spi-ee-isp.RNCAN@canada.ca>; 'Sweeney, Joanne' <joannesweeney@gov.nl.ca>; 'Rowsell, Nicole' <NicoleRowsell@gov.nl.ca>; Chris Carter (chrisarter@gov.nl.ca) <chrisarter@gov.nl.ca>
Cc: Murphy, Ian <IMurphy@cnlopb.ca>; Young, Elizabeth <EYoung@cnlopb.ca>
Subject: Multiklient Invest Newfoundland Offshore Seismic Program, 2018 to 2023

Good day all: Multiklient Invest (MKI) have submitted an amendment to the Environmental Assessment of Multiklient Invest Newfoundland Offshore Seismic Program, 2018-2023 (LGL Limited March 2018). The Amendment of Environmental Assessment of Multiklient Invest Newfoundland Seismic Program, 2018-2023 (LGL February 10 2020) has been submitted in support of MKI's request to remove the specific 7-day/30-km temporal/spatial buffer from the mitigation protocol for snow crab.

The C-NLOPB requests that you review the enclosed EA Amendment and provide comments no later than March 17, 2020. If no response is received from you by the date indicated above, the C-NLOPB will assume that you have no comments.

If you have any questions regarding the EA Amendment, you may contact me (709-778-1431 or dhicks@cnlopb.ca).

Regards
Darren

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