

From: Pilgrim, Bret <Bret.Pilgrim@dfo-mpo.gc.ca>
Sent: May 10, 2021 12:51 PM
To: Hicks, Darren
Cc: Cheverie, Anne V
Subject: RE: Multiklient Invest Newfoundland Offshore Seismic Program, 2018 to 2023

Darren,
DFO has completed a review of the Amendment of Environment Assessment of Multiklient Invest Newfoundland Offshore Seismic Program, 2018-2023 – eSeismic and provide the following comments from consideration by the Board:

- a. 2.0 Testing of a Modified Airgun Array (page 1, final paragraph, final sentence) – Given that the eSeismic test will add 5-7 days of seismic sound to the marine environment and there is uncertainty in potential effects on marine mammals and sea turtles and fish and fish habitat, justification for the testing location should be provided. How does the location minimize potential effects on the environment? For example, will the test location avoid special areas or species at risk?
- b. 2.0 Testing of a Modified Airgun Array (page 4, paragraph 1, sentence 1) – clearly outline the “modified ramp-up” procedure and compare to conventional ramp-up. It is understood that the smallest airgun will be used at the start; will time intervals between individual airguns be gradually reduced during ramp-up?
- c. 3.1 Marine Mammals and Sea Turtles (page 4, paragraph 1, final sentence) – It should be clarified that for 30 minutes before start up, the safety zone must be clear of whale, dolphin, porpoise and sea turtles as per the Statement of Canadian Practice. The Proponent has also committed to using PAM during this time.
- d. 3.1 Marine Mammals and Sea Turtles (page 5, paragraph 1, final sentence) – Will results from this Project be used to contribute to better understanding of relative behavioural responses from eSeismic and conventional seismic sources? If so, explain.
- e. 3.1 Marine Mammals and Sea Turtles (page 5, final paragraph) – Predicted residual effects are not identical for all scenarios presented in LGL 2018a for Marine Mammals or Sea Turtles for Magnitude, Geographic Extent and Duration (Tables 5.12 and 5.14). Consequently, the statement “This is consistent with the findings of the EA” should be explained. Frequency and level of confidence should be provided.
- f. 3.2 Fish and Fish Habitat (page 5, final paragraph) – Frequency and level of confidence should be provided.
- g. 3.3 Fisheries (page 6, final paragraph) – Frequency and level of confidence should be provided.
- h. 3.5 Species at Risk (page 6) – The Proponent should describe any updates to Species at Risk information, or reference updated information in another document. Residual effects should be assessed in consideration of updated information. Level of confidence should also be provided.

i. 3.6 Sensitive Areas (pages 6-7) – It is stated “The conduct of the eSeismic test during summer 2021 is not expected to increase effects on the Sensitive Areas relative to conventional seismic surveying assessed in the EA (LGL 2018a) and in consideration of new information presented in the EA Updates (LGL 2018c, 2019, 2020, in prep.).” The Proponent should explain how new information was assessed to come to this conclusion. For example, are there currently no sensitive areas that will overlap with the zone of influence of eSeismic? Level of confidence should also be provided.

Additionally:

The proponent has specified throughout Section 3. Effects Assessment that the effects assessment within this amendment are “...consistent with the finding of the EA”. There are challenges when comparing the Amendment to the EA provided that there are discrepancies with the EA, as well as, within the EA itself. For example:

- o In the Amendment, duration is consistently < 1 month, while it is consistently <1 to 1-12 months in the EA.
- o For Fisheries VEC, magnitude is negligible to medium in Amendment. In original EA, Table 5.6 shows negligible to low, while text states low to medium (sound) and negligible to low (vessel/equipment presence).
- o For Fish and Fish Habitat VEC, magnitude is low to medium in Amendment. In original EA, Table 5.3 shows negligible to medium (airgun array), while text states low to medium (sound).
- o For Marine Mammals and Sea Turtles VEC, magnitude is low and geographic area is <1 to 101–1000 km² in Amendment. In original EA, Table 5.12 gives negligible to medium and <1 to 1001–10000 km² for airgun array for Marine Mammals. Table 5.14 gives negligible to low and <1 to 101–1000 km² for airgun array for Sea Turtles. Text is consistent with Tables.

We suggest for this amendment, and future amendments, that the proponent highlight and provide a rationale for any discrepancies between the EA and the amendment.

If there are any questions, please let me know.

Thanks,

Bret

Bret Pilgrim

Sr. Biologist – Oil & Gas Regulatory Review

Fish and Fish Habitat Protection Program | Programme de protection des pêches

Ecosystems Management | Gestion des écosystèmes

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Northwest Atlantic Fisheries Centre |

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From: Hicks, Darren <DHicks@cnlopb.ca>

Sent: Monday, April 26, 2021 10:34 AM

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Cc: Murphy, Ian <IMurphy@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 April 14 2021) has been submitted in support of MKI's request to test a modified activation procedure of the airguns, called eSeismic.

The C-NLOPB requests that you review the enclosed EA Amendment and provide comments no later than May 7, 2021. 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 (dhicks@cnlopb.ca).

Regards
Darren

Darren Hicks, M. Env. Sci.
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