

**Section 1.0 Introduction, 2<sup>nd</sup> para., line 5, pg 1** – “...the scope of the Project being assessed extends over several years...”. In actual fact, the scope is only for the 2011 to 2013 period.

**Section 2.0 Project Overview, 4<sup>th</sup> para., pg 2** – “All mitigations listed in the EA will continue to be adhered to as demonstrated in the 2011 and 2012 programs”. Not a completely accurate statement. The C-NLOPB issued a Notice of Non-Compliance on June 14, 2012 in respect of MKI’s Geophysical Program Authorization.

**Section 2.3 Streamer, last para., last sentence, pg 5** – “MKI will include a 10 km vessel turn-around perimeter around the survey area”. Please confirm that this activity is within the EA Project Area.

**Section 2.4 Marine Mammal Safety Zone and Ramp-up Procedure, 1<sup>st</sup> para., line 1, pg 6** – “MKI will implement a 500 m safety zone monitoring program for whale species at risk during survey data acquisition”. As per the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012), each seismic survey must establish a safety zone for monitoring all marine mammals and sea turtles, not just “whale species at risk”. The air source array(s) must be shut down immediately if a marine mammal or sea turtle listed as endangered or threatened on Schedule 1 of the *Species at Risk Act* is observed.

**Section 2.4 Marine Mammal Safety Zone and Ramp-up Procedure, 2<sup>nd</sup> para., line 1, pg 6** – “The Statement of Canadian Practice with Respect to Mitigation of Seismic Sound in the Marine Environment...scoping document”. In May 2008 the C-NLOPB adopted the *Statement of Canadian Practice with Respect to the Mitigation of Seismic Sound in the Marine Environment*, which, in its entirety, is contained in Appendix 2 of the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012). Operators should implement the mitigations listed in the statement when planning and undertaking marine seismic surveys, in addition to any other project-specific measures that may be identified during the environmental assessment process. Appendix 2 also describes recommended practices for interaction with other ocean users, particularly fisheries interests, and recommended reporting formats for marine mammal and seabird observations.

**Section 2.5 Logistical Support, Support Vessels, line 3, pg 6** – There were two support vessels employed each year in 2011 and 2012. Please explain why only one support vessel is being considered for 2013.

**Section 2.6.4 Light Emissions, line 3, pg 7** – “If a helideck is present...”. The vessel has already been identified in Section 2.1. Does it have a helideck?

**Section 2.6.4 Light Emissions, last line, pg 7** – Please provide a reference for the “*Leach’s Storm Petrel Program*”.

**Section 2.6.5 Potential Malfunctions and Accidental Events, 1<sup>st</sup> para., last line, pg 8** – “Any accidental spills will be reported to the C-NLOPB immediately.” The Operator is expected to report all safety and unauthorized discharges or spills in a manner consistent with the *Incident Reporting and Investigation Guidelines* (2012).

**Section 2.6.5 Potential Malfunctions and Accidental Events, last para., pg 8** – has the proponent committed to an Inuit FLO or other observer?

**Section 3.0 Consultation and Community Engagement, 2<sup>nd</sup> para., line 2, pg 8** – Do you mean Fisheries and Oceans Canada?

**Section 4.2.2 Sensitive Areas, 2<sup>nd</sup> para., line 2, pg 11** – “This area (the Gilbert Bay Marine Protected Area) is coastal and well outside the Study Area.” Please identify on a figure and provide the distance.

**Section 5.0 Effects Assessment of Project Activities, line 1, pg 12** – “The potential effects of the MKI seismic survey was assessed in the *EA Addendum Report...mitigation (Table 6)*”. The program was assessed in the:

- Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Labrador Sea and Davis Strait Offshore Labrador by Multi Klient Invest AS (MKI) (RPS Energy March 2011);
- Addendum Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Labrador Sea and Davis Strait Offshore Labrador by Multi Klient Invest AS (MKI) (RPS Energy June 2011); and
- Amendment Environmental Impact Assessment for Marine 2D Seismic Reflection Survey Labrador Sea and Davis Strait Offshore Labrador by Multi Klient Invest AS (MKI) (YOLO Environmental & RPS Energy March 2012)

**Section 5.0 Effects Assessment of Project Activities, line 7, pg 12** – “All effects are...geographic extent”. Do you mean all effects were predicted to be ...geographic extent.

**Section 5.0 Effects Assessment of Project Activities, Table 6, and pg 13** - this Table is missing a category: Ocean Resource Users. Please include all VECs.

**Section 5.0 Effects Assessment of Project Activities, Table 6, pg 13** – Appendix 2 of the *Geophysical, Geological, Environmental and Geotechnical Program Guidelines* (C-NLOPB 2012) contains recommended environmental planning, mitigation and reporting measures for marine seismic surveys in the NL offshore area. Section I contains verbatim the *Statement of Canadian Practice with Respect to the Mitigation of Sound in the Marine Environment* that describes measures for the planning and conduct of marine seismic surveys that are intended to

prevent or minimize potential effects upon the natural environment. Section II contains recommended practices for interaction with other ocean users, particularly fisheries interests, during the conduct of surveys. Finally, Section III contains recommended reporting formats for marine mammal and seabird observations during surveys. Please ensure that mitigative measures identified in Table 6 are consistent with the Guidelines.

**Appendix A Consultation Reports, Section 1 Introduction, last line, pg 17** – “The geophysical data to be collected are within the previously assessed “*study areas*”. The geophysical data to be collected must be within the “*Project Areas*” assessed.

**Appendix A Consultation Reports, Section 2 Consultations, Table 1, pg 17** – The Table does not appear to be complete (see consultation description in Section 3). The C-NLOPB was consulted on February 14, 2013 and the Nunatsiavut Government and Torngat Fisheries were consulted on April 10 and 11, 2013.