



March 31, 2016

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

**Attention: Dave Burley, Director of Environmental Affairs**

Dear Dave,

**Re: Amendment of Multi Klient Invest AS Southern Grand Banks Seismic Program 2014-2018 Environmental Assessment**

Multi Klient Invest AS and its affiliates ("MKI") are requesting an Amendment of the Multi Klient Invest AS Southern Grand Banks Seismic Program 2014-2018 Environmental Assessment (EA), specifically regarding text in Subsections 2.2 and 5.6.2.3. The text in these subsections refers to the employment of Inuit personnel as additional Fisheries Liaison Officers (FLO) and Marine Mammal Observers (MMOs). The blocks of text in these two subsections are as follow:

Subsection 2.2 (page 7 of the EA)

*"One FLO, provided by the Fish, Food and Allied Workers (FFAW), will be on board the seismic vessel to ensure implementation of communication procedures intended to minimize conflict with the commercial fishery, and another Inuit FLO will be onboard the support vessel. An additional Inuit observer will also be onboard the seismic vessel to assist with marine mammal observations."*

Subsection 5.6.2.3 (page 151 of the EA)

*"The survey will place FLOs on board the seismic ship and support vessel to communicate with fishing vessels at sea, and relay information to shore as needed (at least two FLOs – one FFAW representative on the seismic vessel and an Inuit representative on the support vessel)."*

While MKI have trained and employed Inuit to serve in these roles as part of its mitigation measures during seismic surveys in offshore Labrador, it is unnecessary to do the same for seismic surveys in the Southern Grand Banks (SGB) Project Area. The rationale for this is as follows:

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- The Inuit are not familiar with the waters and fishing vessels that may be encountered in the Southern Grand Banks Project Area; and
- Inuit FLOs and MMOs will be employed for the entire season as part of the mitigation measures for MKI's 2016 operations in offshore Labrador and the NE Newfoundland Slope. There is an insufficient number of trained Inuit available to fulfill similar roles during seismic surveying in the Southern Grand Banks Project Area.

It should also be noted that experienced FLOs and MMOs will still be deployed during seismic surveying in the Southern Grand Banks Project Area.

The proposed rewordings of the two blocks of text noted above are as follow:

Subsection 2.2

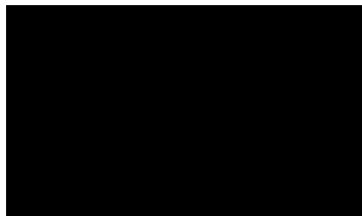
*“One FLO, provided by the Fish, Food and Allied Workers (FFAW), will be on board the seismic vessel to ensure implementation of communication procedures intended to minimize conflict with the commercial fishery.”*

Subsection 5.6.2.3

*“The survey will place an FLO on board the seismic ship to communicate with fishing vessels at sea, and relay information to shore as needed.”*

Considering that FLOs and MMOs will still be used as standard mitigation measures during seismic surveying in the Southern Grand Banks Project Area, there will not be any environmental effects on relevant Valued Environmental Components (VECs) due to the absence of Inuit FLOs and/or MMOs. The degree of certainty regarding this prediction is *high*.

Yours faithfully,



Vice-President MultiClient  
North America

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