



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

May 4, 2016

Attention: Darren Hicks, Environmental Analyst

**Re: Amendment of Multiklient Invest AS Southern Grand Banks Seismic Program 2014 – 2018
Environmental Assessment**

Dear Mr. Hicks:

Further to your email of May 2, 2016, this letter provides Multiklient Invest AS's ("MKI") response to the Nunatsiavut Government ("NG") comments following its review of the Amendment of MKI's Southern Grand Banks Seismic Program 2014–2018 Environmental Assessment.

The NG comments are included for reference, with the MKI response below.

Nunatsiavut Government comment:

The NG does not agree nor support the proposed amendments to the text in Subsections 2.2 and 5.6.2.3 of the Environmental Assessment ("EA") in relation to the Inuit personnel as Fisheries Liaison Officers ("FLO") and Marine Mammal Observers ("MMO"). Both of these sections were included as a result of negotiations through in-person consultations with MKI, where the importance of building capacity and training for Inuit was recognized. These sections were negotiated in good faith and the NG expects the Proponent to meet the terms of these sections in the EA.

Additionally, the rationale given by the Proponent for modifying Subsections 2.2 and 5.6.2.3 cannot be justified. At the yearly consultations with MKI, it has been suggested that additional Inuit be trained by the Proponent for the FLO and MMO positions, to ensure that the obligations of the EA could be met for the duration of the project. These recommendations have also been suggested in the majority of the NG's responses to the C-NLOPB on all projects from this Proponent. Furthermore, to suggest that Inuit would not be familiar with the waters on the South Grand Banks Project Area is completely inaccurate. Inuit depend on the marine environment for a subsistence lifestyle and for their economic livelihood. Inuit are excellent observers of the environment, have extensive knowledge of the marine ecosystem and therefore would be able to function in the Southern Grand Banks, which was recognized in the in-person consultations that led to these sections being included in the EA.

MKI response:

MKI strongly maintains that the specific positions of Inuit FLO and MMO have no environmental mitigation relevance for the Southern Grand Banks area. References to these positions in the 2014 EA were statements of fact.



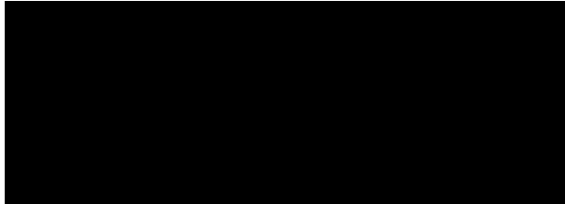
Inuit were employed for the entire 2014 season on the same operation that would spend 5 weeks in the Labrador Sea and the remainder of the season working in Southern Grand Banks area. Employment of the Inuit in 2014 while not working in the Labrador Sea area was provided by MKI as a benefit to that group and this amendment seeks to clarify that.

The discussions between MKI and the NG related to the program in the Labrador Sea, and more generally, on how to increase opportunities for Inuit. To that end MKI instructed its crewing agents to seek candidates for maritime positions in 2014 and 2015 in addition to the Inuit FLO and MMO. In 2016 MKI is once again trying to increase employment opportunities for Inuits during its operations in offshore Labrador and has established relationships with an Inuit association and company in Labrador to source suitable qualified Inuit for maritime positions. Advertisements have been placed in local media and several candidates identified. These efforts are consistent with Benefits Plan requirements.

MKI has no issue in maintaining and enhancing Inuit participation in its Labrador Sea program and submits that the EA amendment addresses a separate matter and does not detract from MKI's commitment to indigenous groups.

We trust the foregoing will be of assistance to the C-NLOPB and should you have any further questions or need additional clarification please do not hesitate to contact the undersigned.

Yours truly,



Vice-President MultiClient
North America