



NUNATSIAVUT
kavamanga Government

Nunaliginikmik amma Nunamiutanik
Ujaganik Imaniklu

Lands and Natural Resources

Darren Hicks,
Environmental Analyst
Canada-Newfoundland and Labrador Offshore Petroleum Board
140 Water St., 4th Floor
St. John's, NL A1C 6H6
709-778-1431

December 7, 2015

**Re: NG COMMENTS ON SCOPING DOCUMENT FOR SEITEL CANADA LTD. EAST COAST
OFFSHORE SEISMIC PROGRAM, 2016-2025**

Dear Mr. Hicks,

Please find below our comments with respect to the scoping document prepared for *Seitel Canada LTD.' East Coast Offshore Seismic Program (2016-2025)*. It is important to take these comments in the context of previous submissions made to the C-NLOPB whereby we have continuously voiced concern over an increased length of program duration as well as geographic extent of offshore exploration programs.

The Nunatsiavut Government has significant concern with the duration (2016 – 2025) of the proposed offshore program. The Labrador Coast is a poorly understand environment that is constantly changing. This includes, but is not limited to, changes in sea ice conditions and fish abundance. Recognizing that it is unlikely that this environment will be consistent and stable over the duration of the proposed project, it would be irresponsible to approve the project from an environmental and fisheries perspective.

Additionally, a review of the Labrador Shelf Strategic Environmental Assessment (SEA) is currently underway and is expected to be completed in 2017. Approving a project that goes well beyond this date would not be acceptable, given that the SEA guides project-specific environmental assessments. Therefore, the Nunatsiavut Government would recommend that the project description be re-submitted for 2016-2017. Once the SEA Review is completed, the project proponent would be required to re-submit its project for future

25 Ikajuktauvik Road, PO Box 70, Nain, NL, Canada A0P 1L0 ► Tel: 709.922.2942 Fax: 709.922.2931 ► Email: nain_reception@nunatsiavut.com

Makkovik
PO Box 92
Makkovik, NL A0P 1J0
Tel: 709.923.2365
Fax: 709.923.2366

Hopedale
PO Box 91
Hopedale, NL A0P 1G0
Tel: 709.933.3777
Fax: 709.933.3746

Rigolet
PO Box 47
Rigolet, NL A0P 1P0
Tel: 709.947.3383
Fax: 709.947.3371

Postville
General Delivery
Postville, NL A0P 1N0
Tel: 709.479.9880
Fax: 709.479.9891

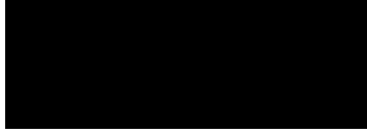
Happy Valley - Goose Bay
1A Hillcrest Road, PO Box 909, Stn. 'B'
Happy Valley - Goose Bay, NL A0P 1E0
Tel: 709.896.8582
Fax: 709.896.2610

North West River
7-13 River Road, PO Box 234
North West River, NL A0P 1M0
Tel: 709.497.8356
Fax: 709.497.8311


activity in subsequent years. Alternatively, the C-NLOPB may consider leaving the offshore Labrador portion out of the project description until the SEA Review is complete; upon which time the proponent may register a project specific to activity in that area.

Thanks for your understanding and we look forward to hearing from you.

Best regards,

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Environmental Assessment Manager

cc.,  Director of Non-Renewable Resources, Nunatsiavut Government