



December 9, 2015

Rodd Laing  
Environmental Assessment Manager  
Nunatsiavut Government  
P.O. Box 70  
Nain, NL A0P 1L0

Dear Mr. Laing,

**RE: Environmental Assessment of Seitel Canada Ltd. East Coast Offshore Seismic Program, 2016 to 2025**

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This letter is in response to your December 7, 2015 correspondence to the Canada-Newfoundland and Labrador Offshore Petroleum Board (C-NLOPB).

To briefly summarize the process to date, upon submission of the *Project Description: Seitel's East Coast Offshore Seismic Program, 2016-2025* (LGL Limited November 3, 2015) by Seitel Canada Ltd. (Seitel) on November 3, 2015, it was determined by the C-NLOPB that the proposed project would require an authorization pursuant to the *Accord Acts*. On November 19, 2015 the C-NLOPB provided the Project Description and Draft Scoping Document to potential agencies and departments, including the Nunatsiavut Government (NG), that may have expertise and would wish to participate in the environmental assessment (EA) of this proposed program offshore Labrador. We requested a response to this request, as well as any comments on the Draft Scoping Document, by December 3, 2015.

With respect to your comment on the proposed duration of the program, we note that when a proposed project spans multiple years, the Proponent is required, in each subsequent year activity is planned, to provide the following to the C-NLOPB:

- An outline of the proposed activities for that year;
- Confirmation that the proposed program activities fall within the scope of the previously assessed program;
- Confirmation that the EA predictions remain valid; and
- Information regarding the adaptive management of requirements of the SARA into program activities (e.g., introduction of new species or critical habitat to Schedule 1; additional mitigations; implementation of recovery strategies and/or monitoring plans).

If there are any changes in the scope or if new information becomes available that may alter the original EA conclusions, then a revised EA will be required to be completed prior to subsequent authorization.

You also pointed out the planned 2017 completion date of the Labrador Shelf Strategic Environmental Assessment (SEA) Update and suggested that the temporal scope of the project-specific EA should mirror that of the SEA review. An SEA typically involves a broader-scale environmental assessment that considers the larger ecological setting, rather than a project-specific environmental assessment that focuses on site-specific issues with defined boundaries. They are not meant as a replacement for project-specific EA. The objective of an SEA is to provide the type and level of information necessary to

aid decision-making at the early stages of the rights issuance process – although they also may assist scoping and focus of subsequent project-specific environmental assessments.

If you have any questions on the attached, or wish to discuss the above, I may be reached at 709-778-1431 or via email at [dhicks@cnlopbc.ca](mailto:dhicks@cnlopbc.ca).

Yours truly,

*Original signed by Darren Hicks*

Darren Hicks  
Environmental Analyst

C. D. Burley  
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