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**KEITH SULLIVAN**  
President

**DAVID DECKER**  
Secretary-Treasurer

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Thursday, June 21, 2018

Darren Hicks  
Environmental Analyst  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
140 Water Street, 5<sup>th</sup> Floor, TD Place  
St. John's, NL A1C 6H6

**Re: EA Addendum for TGS NOPEC Geophysical Company ASA and Multi Klient Invest AS Offshore Labrador Seafloor and Seabed Sampling Program, Newfoundland and Labrador Offshore Area, 2014-2019**

Dear Mr. Hicks,

While not directly related to fishing, it is not evident that consideration has been given to conducting the proposed 2018 program within the recently announced Northeast Slope Marine Refuge. Page 29 of the document depicts the 2018 program areas alongside sensitive areas within the study area.

There do not appear to be any additional mitigation measures to ensure that marine conservation targets in this area will be met. Marine conservation has to be meaningful and consistent and it is unclear how environmental effects of all program activities can be assessed to be negligible and adverse effects assessed as not significant.

If you have any questions or comments please feel free to contact the undersigned.

Kind regards,

Robyn Lee  
Petroleum Industry Liaison

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