

August 12, 2014

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

Re: Environmental Assessment Addendum for TGS Offshore Labrador Seafloor and Seep Sampling Program 2014-2019

Dear Darren:

Thank you for these final comments on the Environmental Assessment and its Addendum.

A beneficiary of the Nunatsiavut Government will be on board the vessel as the Marine Mammal Observer (MMO) and bird observer. Bird observations will be made in transit (and during coring operations) and marine mammal observations will be made during operations. The bird and marine mammal observations will be made for data collection only.

MMOs are a useful mitigation measure to avoid harm to marine mammals within a 500 m safety radius of high area of ensonification during extensive seismic operations when arrays are active over long periods of time. Two things are of note about this program: use of the sub-bottom profiler is only a few minutes at each station with ample time between stations, making any impact on marine mammals unlikely; and levels drop below 228.8 within 1 m of the source as per C-NOLPB (2012) cited guidelines. Together, noise level and length of activity will likely not cause any environmental effects. As noted, there will be a MMO on board the vessel. However, no further mitigation (i.e., shut down of SBP if marine mammals are observed within 500 m of the vessel) will be implemented.

Thank you for your assistance with reviewing the Environmental Assessment Addendum. Please call [REDACTED] or e-mail me directly if you have any questions concerning the document or the proposed program.

Sincerely,

[REDACTED]

[REDACTED]
Senior Regulatory & Compliance Specialist
TGS

[REDACTED]
Cc: Elizabeth Young, C-NLOPB
Dave Burley, C-NLOPB