

Files:	Project Description and Draft Scoping Document
Operator:	Multiklient Invest
Program:	Offshore Seismic and Environmental Data Collection Program, 2025-2029

Comment #	Report Text	Section#; Page #; Paragraph/Sentence#
1	Project Description	General
2	Project Description	Section 1.0: Introduction , page 1, Figure 1.1
3	Project Description	Section 2.2.6: Seismic Energy Source Parameters , page 7, paragraph 2
4	Project Description	Section 2.2.7: Seismic Streamers and Ocean Bottom Nodes , page 7, paragraph 2, sentence 2 - <i>"Nodes are placed in an orderly grid on the seafloor"</i> .

5	Project Description	Section 2.2.8: Floating Lidar Systems , page 9, paragraph 1
6	Project Description	Section 2.3: Mitigation and Monitoring for Marine Mammals, Sea Turtles and Seabirds , page 9, paragraph 1
7	Project Description	Section 3.3: Effects of the Project on VECs , page 10, paragraph 1
8	Draft Scoping Document	General
9	Draft Scoping Document	General
10	Draft Scoping Document	Section 5.2.4: Summary of Potential Issues, <u>Biological Environment</u>: Marine Fish and Shellfish , page 6 -7
11	Draft Scoping Document	Section 5.2.5: Summary of Potential Issues, <u>Biological Environment</u>: Marine Mammals , page 7
12	Draft Scoping Document	Section 5.2.6: Summary of Potential Issues, <u>Biological Environment</u>: Sea Turtles , page 7
13	Draft Scoping Document	Section 5.2.6: Summary of Potential Issues, <u>Biological Environment</u>: Species at Risk (SAR) , page 7-8

14	Draft Scoping Document	Section 5.2.7: Summary of Potential Issues, <u>Biological Environment: Sensitive Areas</u>, page 8
15	Draft Scoping Document	Section 5.2.8 to Section 5.2.12: Summary of Potential Issues, <u>Marine Use, Environmental Management and Biological and Follow-up Monitoring</u>, page 8-10

DFO Comment/Clarification Request

Points of information: activities are assessed on a case-by-case basis for OECMs; no oil and gas activity can occur inside the Laurentian Channel Marine Protected Area.

Study area overlaps 4 Marine Conservation Areas in the NL Region:

NE NL Slope OECM
Division 30 Coral Closure
Laurentian Channel MPA
Funk Island Deep

Suggest adding polygons of these areas to Figure 1.1

This section of the project EA should include a description of how the "Gemini" configuration may differently affect pelagic and benthic fish, shellfish, species at risk, marine mammals and sea turtles, in comparison to standard configurations.

Throughout the EA process, recommend providing information on the following to facilitate DFO's assessment:

- 1) How will the ocean bottom nodes be deployed/recovered?
- 2) Is there any lateral movement expected for the nodes?
- 3) What is the benthic footprint of a node (including any lateral movement)?
- 4) What are the locations of node placement?
- 5) What benthic habitat and species (including species at risk) will or could be present in locations of node placement?
- 6) Does the number of 1000-3000 OBNs represent the entire 4 year program, 1 survey year, or for a single section/area being surveyed?
- 7) How many node placement locations will there be?

Throughout the EA process, recommend providing information on the following to facilitate DFO's assessment:

- 1) How will the Floating Lidar Systems be deployed/recovered?
- 2) Is there any lateral movement expected for the seabed mooring frame?
- 3) What is the benthic footprint of a seabed mooring frame (including any lateral movement)?
- 4) What benthic habitat and species (including species at risk) will or could be present in locations of Floating Lidar System/seabed mooring frame?
- 5) What are the locations of the Floating Lidar System/seabed mooring frame placements?
- 6) What are the mitigations or measures to avoid entanglement of marine species (in particular species at risk) in the mooring lines of the FLS?
- 7) Is there a plan for FLS and seabed mooring frame recovery in the event of moor line breakage?

As there are components of the proposed project with a benthic footprint (nodes and seafloor mooring frames), this section of the project EA should include coral and sponges, special/sensitive areas, and methodologies to avoid sensitive species (in particular corals and sponges).

For the Laurentian Channel MPA, reference should be made to sea pens, smooth skate, Porbeagle shark, Leatherback sea turtle, Northern wolffish, black dogfish.

In addition to ocean bottom nodes, the EA should also examine potential effects of Floating Lidar Systems on marine fauna and benthic habitat.

VECs should also include corals and sponges, Atlantic cod, species in the Laurentian Channel MPA, and sensitive areas.

ROVs are sometimes used to place OBNs on the seafloor in complex bathymetry or when water depth > 100 m. Will ROV be an option for portions of the seismic survey proposed to occur within OECMs?

In the event of a FLS deployed in an OECM, use of ROV before or during placement of the seafloor mooring frame should be considered, in order to avoid areas of corals and sponges.

The potential effect and/or cumulative effect of Floating Lidar Systems on Marine Fish and Shellfish (in particular any potential effects on sensitive benthic habitat) should also be included in the EA.

The potential effect and/or cumulative effect of Floating Lidar Systems on Marine Mammals should also be included in the EA.

The potential effect and/or cumulative effect of Floating Lidar Systems on Sea Turtles should also be included in the EA.

Error: subsection 5.2.6 should read as 5.2.7

The potential effect and/or cumulative effect of Floating Lidar Systems on SAR should also be included in the EA

Error: subsection 5.2.7 should read as 5.2.**8**

The potential effect and/or culmative effect of Floating Lidar Systems on Sensitive Areas should also be included in the EA

Error: subsections should read as follows:

- 1) 5.2. **8** : *Noise/Acoustic Environment*- 5.2.**9**
- 2) 5.2. **9** : *Presence of Seismic Survey Vessel(s)* - 5.2.**10**
- 3) 5.2. **10** : *Fisheries and Other Ocean Users*- 5.2.**11**
- 4) 5.2. **10**: *Accidental Events*- 5.2.**12**
- 5) 5.2. **11** : *Environmental Mangement* - 5.2.**13**
- 6) 5.2. **12** : *Biological and Follow-up Monitoring* - 5.2.**14**