

Phillips, Kim (NRCAN/RNCan)

From: Harris, James Michael <Michael.Harris@CGG.com>
Sent: Friday, October 06, 2017 10:24 AM
To: Phillips, Kim (NRCAN/RNCan)
Cc: LaBouve, Murphy
Subject: RE: Offshore Diving Stakeholder Engagement Session

Kim,

Thanks again for allowing us to participate. Even though this session was a bit more restrictive on our participation, we did want to capture the seismic element. Below is our input on this topic.

ITEM	Regulation	Comments
39	<p>Seismic Activities near the Dive Site</p> <p>1) Where seismic activity is planned within the vicinity of a dive site:</p> <p>a) The diving vessel and seismic vessels must be in regular contact so that both are aware of each other's work program</p> <p>b) a risk assessment must be conducted to assess the risk to the divers health prior to the commencement of the seismic operation , if the seismic activity is to occur within 10km of the dive site;</p> <p>2) No dive activity shall proceed if the risk assessment has determined that the divers may be exposed to noise levels beyond maximum allowable levels prescribed by ACGIH</p>	<p>On section 39, as we noted during the session, we need to ensure there is an adequate notification component to both parties prior to commencement of activities.</p> <p>In seismic, this could be covered in a few ways:</p> <ol style="list-style-type: none">1) Permit – during the process of obtaining a permit, the issuing agency would include in the permit any PLANNED diving operations in the survey area (if no planned activities, it would be included in any approval for the diving operations to notify the seismic company)2) Platform Liaison Document – seismic companies will establish a document with any fixed or mobile drilling installations that would be found in the survey area during the planning phase to establish safe navigation areas (SNA), establish lines of communication and understand any planned activities that could impact seismic operations (i.e. diving operations, supply runs, etc.) <p>Ensuring we have a formal mechanism is important to ensure compliance.</p>

Regards,

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From: Phillips, Kim (NRCan/RNCan) [<mailto:kim.phillips@canada.ca>]
Sent: Thursday, October 05, 2017 10:26 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement Session

Good morning,

Thank you for attending the offshore diving stakeholder session on Monday. We appreciate the valuable feedback received during the session and look forward to receiving your written comments by October 27, 2017.

For your records, please find attached the deck that was presented at the session.

Best regards,

Kim Phillips
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Natural Resources Canada
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