Preamble (2 July 2026)

The following are MKI's responses to additional comments by Fisheries and Oceans Canada (DFO) on MKI's Environmental Assessment (EA) Addendum, which was prepared to address original reviewer comments received from the C-NLOER on 28 November 2025.

Fisheries and Oceans Canada (DFO)

General Feedback

The 500 m safety zone mentioned throughout the Environmental Assessment Report is noted to be the minimum size required under the Statement of Canadian Practice with respect to the Mitigation of Seismic Sound in the Marine Environment. The cumulative effects of frequent, high-intensity impulses on marine mammals, turtles and other species are difficult to quantify. The surveys are expected to span multiple summer seasons in important marine mammal feeding and raring habitat, which may add additional uncertainty due to the presence of young individuals.

Is it possible to extend the safety zone beyond 500 m if conditions are agreeable for marine mammal observers?

The following sources may be useful to define the size of the safety zone (a shared origin between some sources and the EA Report is noted):

https://csas-scas.dfo-mpo.gc.ca/meetings-reunions/f088ddae-d7bb-42c5-8ac7-454d0d4239b4

https://www.fisheries.noaa.gov/s3/2025-09/ESA-AllSpeciesThresholdSummary-2025-508-OPR1-9.16.25-.pdf

MKI Response: MKI is committed to following the mitigation and monitoring requirements in the Statement of Canadian Practice (SOCP). The use of a 500 m safety zone for ramp up delays and airgun array shut downs has been well established offshore Newfoundland. We understand that the SOCP may be undergoing updates by DFO. MKI is committed to following mitigation and monitoring requirements in the SOCP when the document is updated.

Specific Feedback

MKI's response to comment DFO-3:

- The replacement text in the Addendum should also include this relevant statement from Section 4.2.1.1 of the EA Report: "However, planktonic stages of commercial invertebrates (e.g., northern shrimp *Pandalus borealis*, snow crab *Chionoecetes*

opilio, and fishes (e.g., Atlantic cod *Gadus morhua*) are described in the following subsections because of their VC status."

MKI Response: Agreed. The statement as noted above should be added back to the original paragraph from the EA.

MKI's response to comment DFO-5:

- DFO is happy to clarify any regulations that pertain to conservation measures such as OECMs in the proposed project area.
- Regarding Figure 4.63, the 3O Coral Closure is not properly identified in the legend as an OECM / Marine Refuge.

MKI Response: The 3O Coral Closure will be properly identified in an updated sensitive areas map to be included in a future EA Update. MKI will meet with DFO prior to the next MKI seismic survey in the Project Area to ensure there is a clear understanding of OECM regulations.