



Cheryl McNeil
FORRI Project Manager
cheryl.mcneil@canada.ca

30 April 2016

ION / GX Technology Canada Ltd: Written comments on Phase 1 policy intent, FORRI Process

Thank you for the opportunity to comment on the “Proposed Policy Intentions for Phase 1 of the Framework Regulations” document (17 March 2016). We have reviewed the document and the PowerPoint presentation provided with it and have no specific comments on the policy intent as presented, other than to say that we commend the overall intent to reduce redundancy, update standards and move towards performance-based requirements, within an efficient and effective regulatory regime.

ION/GXT and its Canadian Project Team has had the experience of permitting and conducting many successful offshore geophysical programs in the Canadian Arctic (via the NEB and local aboriginal authority processes), as well as in the Nova Scotia and Newfoundland and Labrador Accord offshore areas within the past decade and a half. This experience - working in each of the administrative areas in Canada - has allowed us a particular opportunity to understand both the commonalities and differences in these regimes as they have evolved over this period. It has also led us to appreciate that each of these regions sometimes requires solutions tailored to the unique environmental and operational circumstances of the area, as well as to the particular needs and expectations of its citizens.

Because we expect to be working in these areas again in the future, we have a strong and direct interest in all aspects of the FORRI process, and therefore request that GXT, a division of ION Geophysical (Contacts: Robert Pitt, Environmental Manager, and Dean Kennedy, Project Manager) be included as a Direct Stakeholder in all future industry consultations.

Again, thank you for this opportunity, and we look forward to participating in the subsequent phases.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Kennedy".

Dean Kennedy
Project Manager
Operations & Engineering GXT, a division ION Geophysical
20 Duntara Cres.
St. John's, NL A1E 5Z1

Cc:

Fred Allen, fredallen@gov.nl.ca

Kim Himmelman, Kim.Himmelman@novascotia.ca

Robert Pitt, Rob.Pitt@iongeo.com, ION/GXT Environmental Manager