



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

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ION / GX Technology Canada Ltd: Written comments on Phase 2 policy intent, FORRI Process

Thank you for the opportunity to comment on the “Proposed Policy Intent for Phase 2 of the Framework Regulations” document. Please see the ION comments below.

We look forward to participating in the subsequent phases.

Sincerely,

A handwritten signature in blue ink, appearing to read "DK", written over a faint circular stamp.

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

Policy Intent Phase 2 of the Framework Regulation 14.23

14.23 FINAL GEOSCIENTIFIC, GEOTECHNICAL OR ENVIRONMENTAL PROGRAM DATA REPORTING

(1) The operator shall ensure that the final operations and processing report(s) as defined in subsection (2) of this section and the interpretation report as defined in subsection (3) of this section (if applicable) together with the final processed data are provided to the Board within 12 months of completing any geoscientific, geotechnical or environmental program.

(2) The operations and processing report(s) required by sub-section (1) shall be provided in a form and manner prescribed by the Board and shall contain as applicable:

- (a) the program number assigned by the Board;
- (b) the title, author and date of the report and the executive summary and table of contents;
- (c) the names of the operator, contractors and any interest owners;
- (d) a description of all installations, vessels or aircraft used to execute the program, including any support vessels;
- (e) a description of the program including
 - (i) key project dates, including commencement, suspension and completion dates,
 - (ii) the equipment used,
 - (iii) the operational methods employed,
 - (iv) the number of crew, and
 - (v) the quantity of data collected, broken down by data acquisition technique;
- (f) location maps illustrating the data acquisition program including the identification and location of data points, lines or areas and the type of data acquired;
- (g) location maps that show the boundaries of the area that is subject to each interest covered by the operation and the identification number of each such interest;
- (h) a time breakdown illustrating the type and duration of all activities including any non-productive time;
- (i) for any geoscience program,
 - (i) the instrument type, the accuracy and repeatability of the navigation system, the accuracy of the positioning and survey systems, the parameters and configuration of both the energy source and the recording system, and
 - (ii) a description of the geoscience data acquired including the data processing sequence and parameters; and

(j) shot point maps, track plots, flight lines with numbered fiducial points, gravity station maps, location maps for any samples or core holes, and any photographs and videos as applicable.

(3) Subject to subsection (6), the interpretation report required by sub-section (1) shall be provided in a form and manner prescribed by the Board and shall contain as applicable:

(a) bathymetric or topographic maps compiled from the data collected;

(b) a written discussion along with interpretative maps that are appropriate to the data collected including

(i) structure and isopach maps, structure and interval maps in time and depth, velocity and residual velocity maps, and seismic attribute maps

(ii) final Bouguer gravity maps and any residual or other processed gravity maps,

(iii) final total magnetic intensity contour maps and any residual, gradient or other processed magnetic maps,

(iv) final controlled source electromagnetic resistivity maps, and

(v) surficial maps generated from any seabed, geohazard or a pipeline route survey;

(vi) any geological maps;

(c) a written discussion of the interpretation with reference to

(i) geological and geophysical correlations,

(ii), correlations between gravity, magnetic, controlled source electromagnetic and seismic data including correlations to any data acquired during previous surveys,

(iii) in the case of seabed surveys, the geophysical correlation of shallow seismic data with data from cores and geotechnical boreholes,

(iv) details of corrections or adjustments that were applied to the data during processing or compilation,

(v) the operator's velocity information that was used in a time-to-depth conversion,

(vi) core and sample descriptions,

(vii) geoscientific and geotechnical analyses;

(viii) geohazard reports; and

d) a description of synthetic seismograms and seismic modelling studies that use synthetic seismograms, vertical seismic profiles at wells that were used in the interpretation of the operation data, amplitude versus offset studies, and any seismic inversion studies.

(4) The final reports required by sub-section (1) shall be accompanied by all acquired data in a form and manner prescribed by the Board including, as applicable,

- (a) track plot, shotpoint location and sample location data, time stamped,
- (b) bathymetric data,
- (c) all final processed seismic data for each 2D seismic line in time and depth,
- (d) a final processed 3D volume and each line generated from that volume in time and depth,
- (e) any vertical seismic profiles, synthetic seismograms, amplitude versus offset data or any seismic inversion data,
- (f) for any seabed, geohazard or a pipeline route survey,
 - (i) processed high-resolution data for each line,
 - (ii) location maps for any samples, and
 - (iii) any photographs and any videos;
 - (iv) sub-bottom profiler and side-scan sonar data;
- (g) for any environmental programs, any photographs and any videos;
- (h) in the case of a gravity or magnetic survey, a series of gravity and magnetic profiles across all gravimetric and magnetic surveys;
- (i) in the case of controlled source electromagnetic data, final processed cross-sections on all receiver lines, curves from all receivers and 2D and 3D final models generated.

(5) In submitting a map pursuant to subparagraph (3)(b), the operator shall incorporate any previous data collected by the operator that are related to the area covered by the map and that are of a type similar to the data from which the map was produced.

(6) An operator who has conducted a non-exclusive survey need not submit an interpretation report required by sub-section (3) provided the data from that survey are available for purchase or lease by the public.

ION Section 14.23 Comments

All of the above data deliverables may not be included in the commercial agreements between operators and their clients. The operator should not be required to create additional data processing deliverables for the board.

The numbers of years that an operator's exclusive or non-exclusive data shipment will remain confidential and the data shipment deliverables that are confidential should be listed in this section. This is a major factor when deciding if a non-exclusive program gets sanctioned.