



VIA EMAIL AND FEDEX

November 6, 2019

Donna S. Wieting
Director, Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway, 13th Floor
Silver Spring, MD 20910

Re: Incidental Harassment Authorization for Atlantic Seismic Survey

Dear Ms. Wieting:

On November 30, 2018, the National Marine Fisheries Service (“NMFS”) issued an incidental harassment authorization to “ION GeoVentures,” pursuant to Section 101(a)(5)(D) of the Marine Mammal Protection Act (the “IHA”). The IHA relates to a seismic survey that GX Technology Corporation has proposed to conduct on the Atlantic Outer Continental Shelf (“OCS”). GX Technology Corporation’s application for a permit to conduct that survey is pending with the U.S. Bureau of Ocean Energy Management (“BOEM”). For the reasons explained below, we write to request that NMFS administratively change the name of the holder of the IHA from “ION GeoVentures” to “GX Technology Corporation.”

By way of background, GX Technology Corporation is a U.S. corporation registered in the State of Texas. GX Technology Corporation is a wholly owned subsidiary of ION Exploration Productions (U.S.A.), Inc., which, in turn, is wholly owned by ION Geophysical Corporation. “ION GeoVentures” is the name of a business unit within ION Geophysical Corporation that performs a specific business function for entities in the corporate structure of ION Geophysical Corporation, including for GX Technology Corporation. As relevant here, GX Technology Corporation is the company that has planned, and would carry out (if permitted), the above-referenced seismic survey on the Atlantic OCS.

The application for the IHA contained an unintentional clerical error. Specifically, the application incorrectly listed “ION GeoVentures” as the IHA applicant when in fact “GX Technology Corporation” should have been listed as the IHA applicant. Consequently, the IHA issued by NMFS names “ION GeoVentures” as the holder of the IHA. To correct this clerical error, we respectfully request that NMFS please change the name of the holder of the IHA from “ION GeoVentures” to “GX Technology Corporation.” Through this letter, GX Technology Corporation commits to complying with all of the terms, conditions, stipulations, and restrictions set forth in the IHA.

In sum, we request only a change in the IHA holder's name. We request no changes to the rest of the IHA. Additionally, this name change will not cause, and does not reflect, any changes in the planned performance of the underlying survey. If you have any questions or concerns, please do not hesitate to call. We appreciate NMFS's cooperation and regret any inconvenience this may cause.

Sincerely,



Ken Williamson
Executive Vice President and Chief Operating Officer
GX Technology Corporation



Joseph R. Gagliardi
Senior Vice President, ION GeoVentures
ION Geophysical Corporation

cc: Deborah Ben-David, Attorney, NOAA GC
Benjamin Laws, Senior Biologist, NMFS
Teree C. Campbell, Supervisor, Data Acquisition and Special Projects Unit, BOEM