

June 24, 2015

**Sent via email**

Honourable Leona Aglukkaq, Minister of Environment  
458 Confederation Building  
Ottawa, Ontario  
K1A 0A6

Dear Minister Aglukkaq:

**Re: WesPac Tilbury Marine Jetty Project**

In response to the government's request for comment on the WesPac Tilbury Marine Jetty Project (the "Project"), we request that you exercise your authority under the *Canadian Environmental Assessment Act* to subject the Project to a robust federal environmental assessment. The potential wellhead-to-waterline impacts from the project are significant enough to merit a detailed and rigorous review that provides adequate opportunity for issues to be raised and addressed.

In the assessment, we also recommend that you include upstream environmental impacts associated with the extraction, processing and transmission of the natural gas needed to supply the Project. Their inclusion makes sense because the liquefaction process is only feasible if all of the other components of the supply chain are in place.

Pembina's B.C. LNG and shale gas scenario-planning tool (recently developed with modelling support from Navius Research) demonstrates that the majority of impacts associated with the Project are from upstream development.<sup>1</sup> These would be excluded if the review only focused on the LNG terminal for the Project. For example, an additional 1410 wells could need to be drilled in northeast B.C. to produce the natural gas needed to supply the Project over a 30-year life span. Those wells could require 22.5 billion litres of freshwater for hydraulic fracturing. And the cumulative wellhead-to-waterline greenhouse gas emissions from the Project over 30 years could total 48 million tonnes of CO<sub>2</sub>e - 68% of which could come from upstream sources. In 2030, the annual greenhouse gas emissions could be 1.5 million tonnes CO<sub>2</sub>e.<sup>2</sup>

In this context, we believe that the public interest is best served by having the Project undergo a federal environmental assessment that includes the upstream impacts.

Yours sincerely,



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<sup>1</sup> The tool is available at: <http://www.pembina.org/pub/BCShaleTool>. The environmental impacts will depend on assumptions such as the source of the natural gas and the strength of environmental policy. The assumptions used to produce the estimates in this letter are: The WesPac LNG project for LNG natural gas demand; non-LNG shale gas development constant at 2014 levels; the 2030 source of gas is 15% Conventional, 65% Montney, and 20% Horn River Basin; and current environmental policies.

<sup>2</sup> Our analysis just considers wellhead-to-waterline impacts. We leave it to other groups to comment on the need for downstream assessment.