

May 25, 2016

Environment and Climate Change Canada
12th Floor, 351 Saint-Joseph Boulevard
Gatineau, Quebec
K1A 0H3

Via Email: ec.egesa-ughga.ec@canada.ca

Re: Enbridge Pipelines Inc.- Line 3 Replacement Program

As a shipper on the Enbridge Mainline system and as a significant producer in the Athabasca oil sands, Suncor Energy is pleased to provide comments on the Review of Related Upstream Greenhouse Gas Emissions Estimates for the Enbridge Line 3 Replacement Project:

Suncor Energy is of the view that the continued development of crude oil production from the Western Canadian Sedimentary Basin (WCSB) including oil sands is not dependent on the approval of Enbridge's Line 3 Replacement Project. If no production is directly attributable to the approval and construction of the Line 3 Replacement Project then no upstream GHG emissions are directly attributable to the Project either.

Suncor Energy does take GHG emissions seriously, as demonstrated by our endorsement of Alberta's Climate Leadership Plan. As noted in the report, the impact of recent policy announcements including Alberta's Climate Leadership Plan or the actions taken by industry to reduce GHG emission intensity were not incorporated into the upstream emissions projections and the predicted emissions are overstated as a result. A key component of Alberta's Climate Leadership Plan is a cap on oil sands GHG emissions. Once this cap is implemented and to avoid redundancy, the upstream GHG emissions associated with upstream projects approved within the GHG emissions cap should not require further assessment in a pipeline approval process.

Notwithstanding Suncor Energy's position that no upstream GHG emissions are directly attributable to the project, the report does overstate the potential GHG emissions for the Project. The Line 3 Replacement Project will restore the capacity of Line 3 to its original design capacity. If the Project does not proceed, Enbridge would continue to maintain and operate Line 3 at its current capacity. Thus the estimated potential upstream GHG emissions that could be attributed to the Project, at most, should be limited to those associated with the 370,000 barrels per day of incremental capacity. Prorating the GHG emissions calculated in the report, would reduce the estimated potential upstream GHG emissions to between 9 and 14 megatonnes of carbon dioxide equivalent for the incremental capacity of the Project.

Suncor Energy agrees with the report's conclusion that investments in crude oil production will be made in other jurisdictions and global oil consumption would be materially unchanged in the long term in the absence of Canadian crude oil production growth. Suncor Energy firmly believes that with the strong regulatory framework, Canadian oil sands production growth can be done responsibly with GHG emission intensities that are competitive with the other production alternatives.



The Line 3 Replacement Project is an important infrastructure project to all Canadians, as it will provide competitive access to markets and maximize the value of the Canadian resource, with lower GHG emission than some alternative modes of transport such as rail.

For further information please contact the writer.

Regards,
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