

Friends of *Morice Bulkley*

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November 5, 2016

Brett Maracle, Panel Manager
Canadian Environmental Assessment Agency
22nd Floor, 160 Elgin Street, Ottawa ON K1A 0H3

RE: Pacific Future Energy Refinery Project EIS

Brett Maracle and CEA Panel,

We call to your attention two inadequacies in the draft guidelines for the EIS requirements for the Pacific Future Energy Refinery Project, both dealing with the scope of the assessment.

Our first concern is that the EIS should consider the ultimate planned size of the refinery. In their project description submitted to your agency June 2016, the proponent describes a 31 795 cubic meter per day or 200,000 barrel per day (BPD) refinery. Yet, in oil and gas industry and financial publications, Mr. Samer Salameh, Executive Chairman of Pacific Future Energy, is quoted as saying that, when all the project modules are complete, the facility will process up to 1,000,000 BPD.¹ Clearly, the environmental and social impacts, particularly cumulative impacts, cannot be assessed without taking the final size of the refinery into account

Our second concern is with how the EA assesses the transport of petroleum products association with the proposal. The receiving and transporting of petroleum products is considered as an incidental in the draft guidelines for the EIS. The raw product (bitumen) and at least some of the final products (diesel,

¹ BOE Report June 10, 1914. <http://boereport.com/2014/06/10/pacific-future-energy-corp-announces-10-billion-bitumen-refinery-project-for-b-c-north-coast/>;

TheStreet Nov 2, 2016 [.thestreet.com/story/12739502/1/pacific-future-energy-corp-announces-10-billion-bitumen-refinery-project-for-bc-north-coast.html](http://thestreet.com/story/12739502/1/pacific-future-energy-corp-announces-10-billion-bitumen-refinery-project-for-bc-north-coast.html)

Area Development June 10, 2014 areadevelopment.com/newsItems/6-10-2014/pacific-future-energy-corporation-green-oil-refinery-british-columbia-canada347834.shtml

gasoline, jet fuel, propane etc.) would be transported along the CN rail line through northwest BC.

Because of our settlement history, the rail line passes through the downtown core of communities, large and small, the length of the CN route. These communities all have a sizeable percentage of first nations people. Additionally, because the rail line follows the rivers, it passes through multiple first nations reserve communities.

Municipalities, band councils and residents of northwest BC have serious concerns regarding the anticipated petroleum shipments, especially around issues of public safety and the adequacy of emergency response in case of accident

For example, the proponent estimates four additional trains per day required to transport feedstock for the proposed 200,000 BDP refinery. There is no circle route therefore, the DOT 117 cars required to transport bitumen will return empty resulting in 8 additional trains per day. Scaling the refinery up, as planned, to one million BPD results in 40 additional trains per day. This is not an insignificant increase.

Municipalities and residents along the route have no means of researching the potential effects of the rail transport component of this project if it is not considered under the EA. Nor would the Panel or Cabinet have means of assessing all implications of the project before making their final decisions.

We recommend that the ultimate planned size of the Pacific Future Energy refinery and the associated rail transport of petroleum products should be specifically included in the EIS for this project.

Respectfully,

Dawn Remington

for the Steering Committee
Friends of Morice Bulkley