



Alternatives North

Files OF-Fac-Gas-I017-2004-1
OF-EP-FacPipe-I003-MAC 04
OF-EP-FieldOp-I003-TL 07
OF-EP-FieldOp-C648-PL 07
OF-EP-FieldOp-S245-NIG 07

September 28, 2015

Sheri Young
Secretary of the Board
National Energy Board
517-10th Avenue, SW
Calgary AB
T2R 0A8

Dear Ms. Young

Mackenzie Gas Project – Certificate of Public Convenience GC-116 Sunset Clause Extension

With the assistance of your staff, we were able to locate the August 20, 2015 letter from Imperial Oil Resources. We understand that the National Energy Board has yet to decide how to deal with this extension request.

Alternatives North was an active intervenor in the original proceeding that led to the issuance of Certificate of Public Convenience GC-116 on March 10, 2011. This was a long and arduous process. The sunset clause (condition 74) allowed Imperial Oil a period of over four and a half years to commence construction of the Mackenzie Gas Project. There has been little if any progress on the Mackenzie Gas Project and the proponents are now seeking a seven year extension.

Such a lengthy extension demands a public review by the National Energy Board and we request an opportunity to submit formal comments and arguments on this proposal. If the request was for a limited period of time with a firm start date, Alternatives North might be in a position to argue that a limited written hearing may be appropriate, but a lengthy, open-ended and uncertain extension is not warranted without a careful and thorough examination.

We request that the National Energy Board hold a public hearing in the NWT to consider this request. Such a hearing should consider the economic feasibility of this project which was first proposed in 2000 when the NWT and the world was in a much different place given climate

change, devolution, world energy prices and the other significant changes that have taken place. We believe such a public hearing should also consider the need for the Mackenzie Gas Project, its economic feasibility, potential commercial impacts and whether it remains in the public interest. The hearing should also examine the progress made on implementing the Joint Review Panel recommendations that were accepted by the Responsible Ministers of the federal and territorial governments.

We look forward to the Board setting out a fair and thorough process to deal with this request to extend the certificate for the Mackenzie Gas Project for another seven years.

Sincerely,

A handwritten signature in black ink that reads "Kevin O'Reilly". The signature is written in a cursive, flowing style with a large initial 'K' and 'R'.

Kevin O'Reilly

cc. Hon. Bernard Valcourt, Minister of Indian Affairs and Northern Development
Hon. Bob McLeod, NWT Premier