

Dear Review Panel:

I continue my opposition to the Northern Gateway Project and the any granting of their request for an extension.

The Northern Gateway Project, and much of the recent and pending tar sands expansion, will help companies owned by the government of China dig up the bitumen and send it there for refining and use. The only real argument for the Northern Gateway project is it will increase profits for the oil industry, and hand over more of our resources, profits and jobs to China. The arguments against it are so numerous and the resulting consequences of an oil spill so overwhelming it is hard to imagine such a proposal would even be contemplated.

The fact the Government of Canada intends to formalize an oil tanker ban with the support of First Nations, municipalities, scientists, the Province of B.C. and its citizens then it make no sense to give an extension to their request since the bitumen cannot go anywhere once it reaches the coast.

## **Environment**

### **Enbridge's Track Record**

The United States National Transportation Safety Board summed up Enbridge's pipeline mode of operation in two words, "Keystone Kops". Spills will happen and no amount of money can justify this threat to British Columbia's lands, water and ocean environments.

### **Spill – Pacific Ocean**

If and when a tanker spill occurs, Enbridge will have zero liability. Tanker owner liability is only to a maximum of \$140 million. The total amount available from international and Canadian pollution funds is about \$1.3 billion. The Exxon Valdez cleanup exceeded \$2.5 billion in 1989 dollars. The BP oil spill in the Gulf of Mexico is estimated to have caused close to \$100 billion in damage. The Enbridge spill of bitumen into the Kalamazoo River is still being cleaned up and is fast approaching the \$1 billion mark.

Currently minimum insurance coverage requirements are totally inadequate and as a result Canadians would be on the hook for tens of billions of dollars in cleanup costs when a spill occurs. This would be assuming that a cleanup could even be undertaken to any great extent. Since bitumen sinks in water, unlike normal crude oil that floats, cleanup attempts would more than likely be futile. Enbridge's own cleanup plan states it would treat a spill like a conventional crude oil spill even though they know from their experience with the Kalamazoo River spill that that approach does not work very well with bitumen. Lasting environmental damage would be irreparable. Enbridge says they will use state of the art cleanup technology. But the state of the art for cleaning an ocean spill of bitumen has yet to be shown if it is even feasible, especially under weather

conditions normally encountered off B.C.'s coast. To my knowledge no research has been done to show how a bitumen spill would behave in a Pacific Ocean environment or how cleanup could even be undertaken.

### **Spill – Land and Rivers**

For the pipeline company (Northern Gateway Pipeline Limited Partnership), Enbridge has skillfully chosen a limited partnership structure, which is set up to limit their exposure and that of other investors relating to liabilities. If a catastrophic spill event occurs, Enbridge itself will be shielded from any liability to clean up the mess. Once the Northern Gateway financial resources are exhausted it will be B.C. and Canadian taxpayers who will be on the hook for billions of dollars in cleanup costs.

Enbridge's track record has shown us what to expect when they have a pipeline spill. They have had numerous ruptures, explosions and spills in recent years and they have shown that they have learned little from these occurrences. Their "Keystone Kops" approach to maintenance, operation and spill response says it all. If the pipeline is built there will be oil spills, the only unknown is how frequent they will be and their size. Since Enbridge cannot guarantee they will not spill any oil this proposed pipeline should not proceed.

### **Economics**

Enbridge's own estimates say crude oil prices will increase \$2 to \$3 per barrel annually over the next 30 years as a result of the pipeline. This will result in significant damage to every consumer and business in the country and the economy in general. Our manufacturing jobs have already gone to China to a large extent.

This pipeline proposal will complete the sell off of Canada. The Chinese government through state owned companies has already started buying up oil sands companies; they will more than likely be supplying the pipes and financing to build and own the pipeline; use their tankers to transport the oil and then refine the bitumen in China.

Also, why the big rush to sell off Canada's oil reserves? Over time oil companies will still be able to sell just as much oil even without Enbridge's pipeline and tankers to China. The longer the oil is held in reserve the more valuable it will become. The environment will also benefit by spreading out the oil sands pollution over a longer time frame.

Do the right thing and reject the Northern Gateway pipeline proposal extension request and protect B.C.'s coasts.

Yours truly,

James Lloyd

3375 Billhirst Place  
Victoria, BC  
V9C 3S6

June 26, 2016