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Our File No.: 70251-1

June 19, 2013

Via Electronic Filing

National Energy Board
444 7th Avenue S.W.
Calgary, AB T2P 0X8

Attn: Ms. Sheri Young, Secretary of the Board

Dear Ms Young:

Re: Application to the National Energy Board by WCC LNG Ltd. for a Licence to Export Liquefied Natural Gas

We are counsel for WCC LNG Ltd. ("**WCC**"), owned by ExxonMobil Canada Ltd. and Imperial Oil Resources Limited (with their affiliates, collectively the "**Project Proponents**"). Please find enclosed for filing with the National Energy Board ("**Board**") the application of WCC pursuant to Section 117 of the *National Energy Board Act* ("**NEB Act**") for a licence authorizing the export of up to 30 million tonnes of liquefied natural gas ("**LNG**") per year, having a natural gas equivalent of approximately 1,461 billion cubic feet or $41.4 \times 10^9 \text{m}^3$ per year, for a term of 25 years (collectively, the "**Application**").

The Project Proponents propose to develop a natural gas liquefaction terminal comprised of natural gas liquefaction facilities, LNG storage facilities, and marine loading facilities ("**LNG Terminal**"). The LNG Terminal will be located on the west coast of British Columbia. Prospective sites for the LNG Terminal are currently being assessed in the vicinity of Kitimat and Prince Rupert, British Columbia. The LNG Terminal will be designed to take delivery of gas primarily from the Western Canadian Sedimentary Basin and liquefy it for export to markets outside of Canada.

Collectively, the Project Proponents have demonstrated global leadership in LNG project development, as well as the development, management, and execution of natural gas, conventional oil, and oil sands resources together with the necessary transportation infrastructure. The Project Proponents, combined, can bring the necessary expertise and capability to develop a successful LNG export project and enable significant incremental Canadian gas resource development.

WCC has prepared the enclosed Application in accordance with Section 118 of the *NEB Act* as amended by the *Jobs, Growth and Long-term Prosperity Act* and relevant filing requirements under

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Section 12 of the *National Energy Board Act Part VI (Oil and Gas) Regulations* ("**Part VI Regulations**"). In that regard, WCC has taken guidance from the Board's Interim Memorandum of Guidance Concerning Oil and Gas Export Applications and Gas Import Applications under Part VI of the *National Energy Board Act*, dated 11 July 2012, and the Board's recent letter decision of 4 February 2013 in LNG Canada Development Inc. (File OF-EI-Gas-GL-L384-2012-01 01). Accordingly, the information provided by WCC in support of the enclosed Application is primarily focused on the "surplus" question in Section 118 of the *NEB Act* and, specifically, whether the proposed gas export quantity, is, having regard to the trends in discovery, surplus to the reasonably foreseeable requirements for use in Canada. To the extent required, WCC is respectfully requesting exemptions from the filing requirements contained in Section 12 of the *Part VI Regulations* that are not addressed in the Application.

Yours truly,



Brad Gilmour

BG
Enclosures

