May 15, 2012

VIA ELECTRONIC MAIL

Jackpine Mine Expansion Panel Secretariat
Canadian Environmental Assessment Agency
160 Elgin Street
Ottawa, ON K1A 0H3

Attention: Mr. Jim Dilav, Joint Review Panel Chairman

RE: Jackpine Mine Expansion Project (JPME) - CEAR No. 10-05-59540

Dear Sir;

Please find enclosed Shell Canada Energy’s (Shell) responses to the Joint Review Panel’s (JRP) January 30, 2012 Supplemental Information Requests (SIRs). In addition, Shell is providing other information and analysis as requested by Aboriginal groups, government agencies, and environmental groups. This submission includes, but is not limited to:

- The filing of a Pre-Industrial Case (PIC) and an updated Planned Development Case (PDC), along with the resultant updates to the EIA Base and Application Cases;
- Further information on our existing operations, mine and tailings management plans;
- A Socio-Economic and Cultural Assessment of associated impacts on Aboriginal communities;
- An assessment of the potential effects of the Project on the Peace Athabasca Delta;
- Use of updated Alberta Biodiversity Monitoring Institute, Alberta Conservation Management Information System and Fisheries and Wildlife Management Information System data;
- An updated approach to assessing forest fires and harvesting plans over the life of the Project;
- An assessment of aerial deposition effects and;
- Use of updated chronic effects benchmarks and naphthenic acids characterization.

The requested PDC has resulted in the need to update data sets and to re-classify the status of projects within the assessment cases. This in turn necessitated updates to the EIA Base and Application Cases. While this work has generated a large volume of information, it consists mainly of updated data due to the amount of time elapsed since 2007.

While various elements of the JPME may have been refined, and in some cases changed due to changing stakeholder expectations (regulator and public), the overall scope of the Project and overall EIA findings remain the same. The Project has merely evolved as it will continue to evolve over the life of the mine.
Shell would like to also take this opportunity to clarify its position with respect to the Muskeg River Diversion Alternative (MRDA) presented to the JRP in May 2011. Based on discussions held over the last year, it has become clear that the original Muskeg River pipeline diversion scheme is no longer a viable development option. As a result, all of the updated environmental assessment work contained within this submission has been based on the MRDA mine development plan. Where appropriate and required, Shell has also updated portions of the EIA Application Case to reflect this change during the latter years of the Project’s development and closure.

Shell respectfully submits that the attached documents, in conjunction with the Project information filed since 2007, now provides the JRP with an unprecedented amount of project and cumulative impact information. These information updates have been done in a way that incorporates the changes brought about by over five years of regulatory initiatives, operational and technological developments, and global economic change. While interested parties will undoubtedly have further questions and comments regarding Shell’s information, and may disagree with Shell’s methodologies and conclusions, Shell submits that these issues are appropriately dealt with at the public hearing.

Accordingly, Shell requests that the JPME application be set down for public hearing in October 2012. This would provide interested parties over 4 months to review and comment on this additional information, and to the extent the JRP requires any further clarification with respect to Shell’s filed information, Shell will attempt to provide that information by September 1, 2012.

Yours truly,

Shell Canada Limited

Donald Crowe
Manager, Regulatory Approvals
Heavy Oil Development

Attachment

Cc:   Jill Adams – CEAA
     Amanda Black – ERCB
     Shawn Denstedt, Katherine Murphy – Osler
     Margwyn Zacaruk – Shell