



File 3200-G070-1
1 October 2004

Mr. Carey Johannesson
Director, Permits and Lands
Gaz Métro Limited Partnership
1717, rue du Havre
Montréal, Québec H2K 2X3
Facsimile (514) 598-3725

Dear Mr. Johannesson:

Re: Rabaska Project – LNG Facilities Filing Requirements

The National Energy Board's Filing Manual, April 2004, does not explicitly address applications for LNG receiving terminals. The Board has issued this document to supplement the requirements of the Filing Manual.

If you require additional information please contact Claudine Dutil-Berry, Technical Leader, Environment at (403) 299-3900.

Yours truly,

A handwritten signature in black ink, appearing to read 'Mantha'.

Michel L. Mantha
Secretary

Attachment

- c.c. Louise Alarie, Transport Canada, facsimile (514) 633-3250
- Michel Demers, Transport Canada, Navigable Waters Protection, facsimile (418) 648-7640
- Claude Brassard, Fisheries and Oceans Canada, facsimile (418) 775-0658
- Bill Aird, Canadian Transportation Agency, facsimile (819) 953-8343
- Louis Breton, Environment Canada, facsimile (418) 649-6030
- Iannick Lamirande, Natural Resources Canada, facsimile (613) 995-5719
- Chantal Coté, Health Canada, facsimile (450) 928-4269
- Yves Simpson, Canadian Environmental Assessment Agency, facsimile (418) 649-6443
- Marie-France Therrien, Canadian Environmental Assessment Agency,
facsimile (613) 957-0941
- Louis A. Leclerc, Lavery, De Billy, facsimile (514) 871-8977

LNG Facilities Filing Requirements

These filing requirements for LNG facilities provide guidance to applicants for LNG facilities regarding the information requirements for an application to the National Energy Board (NEB) in addition to those already set out in the NEB's Filing Manual, April 2004.

In addition to the filing requirements outlined in the NEB Filing Manual, applicants are expected to consider the following additional filing requirements when preparing an application and related supporting documents.

Additional General Requirements

1. In addition to all onshore facilities' locations, describe the offshore facilities' locations and the criteria used to determine their selection.
2. Describe the overall project including the terminal, piping, jetty and LNG tankers. Include volumetric capacities and transfer rates of all project components such as LNG tanker(s), unloading arms, storage tank(s), regasification plant, and send out pipeline.

Additional Environmental and Socio-economic Requirements

3. The application and related supporting documents should illustrate how the Scope of the Environmental Assessment has been met. The Filing Manual does not explicitly address offshore facilities. Applicants are expected to extrapolate from the elements and filing requirements included in the NEB Filing Manual, and apply these to all of the relevant components of the offshore environment.
4. An Environmental Protection Plan, for the purposes of communicating environmental commitments and ensuring implementation of commitments in the field, is required. Environmental mitigation measures may be set out in the environmental and socio-economic assessment and then compiled into an environmental protection plan prior to construction. Alternatively, an environmental protection plan may be included with the environmental and socio-economic assessment, and then updated as needed as a result of the environmental and socio-economic assessment review process.

Additional Engineering Requirements

5. Description of the project design, construction and operation, including safety provisions.
6. Materials specifications for LNG and high-pressure gas piping and facilities.
7. Description, dimensions, operating mechanisms, controls and interconnecting joints for the LNG transfer from the LNG tanker.
8. Description and list of LNG pumps, piping, pressure regulating and metering facilities.
9. Description, including location, design and control of LNG shut off valves at the LNG tank.
10. A layout of fire protection systems and their capacities.
11. A layout of the hazard detection systems. Identification of automatic and manual shutdown systems.
12. Description of gas vapor (boil-off gas) handling systems.
13. Description of the fuel gas system.
14. Technical information of all pressure vessels and boilers.
15. Description of the vent system for all areas of the project.
16. Description of the LNG spill containment at all areas of the project.
17. Description of the LNG tanker auxiliary facilities on the jetty and on the shore.
18. Description of the utilities and waste treatment and disposal facilities.
19. Description of the marine facilities such as dock facilities, fueling station, berthing dolphins, mooring dolphins, tug boat berths, tanker movement and unloading supervisory control and any other relevant facilities.
20. Description of the LNG project facilities security.
21. Description of the LNG project electrical systems.
22. Description of telecommunications systems.

Hazard Assessment and Risk Analysis

23. Provide a discussion of properties of LNG and its behaviour in the case of an accidental release, whether on water or on land.
24. Describe how the design of the facility and management of the operation of the facility will address the risk associated with accidents or natural hazards. Include a description of measures to be used to exclude the public from hazardous areas.
25. Describe and provide a rationale for the location and size of exclusion or buffer zones (both on water and on land).
26. Refer to Appendix II - *Security and Emergency Preparedness and Response Programs* of the Guidance Notes for the *National Energy Board Processing Plant Regulations* SOR/2003-39. Provide a hazard assessment consistent with the guidance provided in section 3.1.1 of the Expected Elements for Emergency Preparedness and Response Programs included in the above-mentioned appendix.
 - Evaluate the various gas vapour dispersion models available for LNG spills on land and water. Provide the rationale for the models selected for the project.
 - Describe the gas vapour dispersion models used for spills on land and water and any assumptions made. Provide any supporting materials and the results of modeling.
27. Provide a risk analysis based on the hazard assessment, including:
 - identification of the methodology and assumptions employed in the risk analysis;
 - consideration of sensitive receptors (e.g., communities, sensitive environments);
 - identification of limitations of methods used in the assessment and any uncertainties regarding the results; and
 - discussion of how the design and operation of the facilities incorporates the learnings from past accidents related to LNG facilities.
28. Provide a description of the emergency preparedness and response program to be implemented for the facility, addressing the following components:
 - Liaison program with first responders;
 - Continuing education program for the public;
 - Emergency response training;
 - Emergency response exercises; and
 - Emergency response equipment.

29. NEB Filing Manual, Guide AA – Post Certificate or Order Requirements, Section AA.1 Filing Requirements – Engineering and Technical, Requirement 5 identifies that an Emergency Procedures Manual is anticipated to be required two weeks prior to the start of operations. Note that due to the complexity of this type of project, an Emergency Procedures Manual would be required to be filed approximately 6 months prior to the planned start of operations (timing subject to change based on evidence presented during application process). Also note that all of the components of an Emergency Preparedness and Response Program as outlined in the Expected Elements for Emergency Preparedness and Response Programs (included in Appendix II - *Security and Emergency Preparedness and Response Programs* of the Guidance Notes for the *National Energy Board Processing Plant Regulations* SOR/2003-39) would be required to be in place and demonstrated to be effective approximately two months prior to the planned start of operations.