BG

Westcoast Energy

St. Clair Pipelines (1996) Ltd.
50 Keil Drive North
Chatham, Ontario
Canada N7M 5M1

November 27, 1998

National Energy Board
444 – 7 Avenue S.W.
Calgary, Alberta
T2P 0X8

Attention: Mr. Michel L. Mantha, Secretary

Canadian Environmental Assessment Agency
13th Floor, Fontaine Building
200 Sacre'-Coeur Boulevard
HULL, Quebec
K1A 0H3

Attention: Mr. Brad Parker, Senior Policy Advisor

Gentlemen:

RE: St. Clair Pipelines (1996) Ltd. ("St.Clair"), Dawn to Lake Erie Pipeline & TransCanada Pipelines Limited ("TransCanada"), Lake Erie Crossing
File 3200-T-1-15, File 3200-S115-1

In its letter of November 13, 1998, the Board indicated its intent to follow a new proposed process for the comprehensive study of pipeline projects within the Board's regulatory jurisdiction. St. Clair respectfully requests that the Board and the Agency re-consider that decision and adopt instead on a trial or pilot project basis, the NEB substitute panel alternative outlined in Section 21 of the Canadian Environmental Assessment Act ("CEAA"). The reasons for this request are as follows.

St. Clair appreciates the progress made by the Board and the Agency towards the development of an effective process for the comprehensive study of pipeline projects. We are also aware that the proposed process is still in its developmental stage, with consultations just underway.

We understand that the development of the comprehensive study process will benefit from the pilot or test studies (Maritimes & Northeast, Halifax and Saint John Lateral), currently underway. On the basis of the consultation held on October 28, 1998 ("CSR Workshop"), however, we believe that the results of these pilot projects should be available before committing all future projects to the new process. As discussed at the workshop, there remain unanswered procedural issues which carry with them the

potential for delay. Indeed we believe the comprehensive study evaluation process would benefit from the experience garnered in an NEB 'substitute panel' review, on a pilot or trial basis, in order to determine the best means of dealing with major pipeline projects in the future. Finally, we submit that going directly to a panel review eliminates the risk that at the end of the comprehensive study process, the applications might then be sent to a panel.

We note too that public support for the panel alternative was expressed by the solicitors for the Gas Pipeline Landowners Association of Ontario St. Clair ("GAPLO-St.Clair) in their May 27, 1998 letter to the Board. While St. Clair does not agree that the project is likely to cause significant adverse environmental effects, the perceptions of GAPLO-St.Clair are evidence of public concern that can be addressed through the NEB substitute panel review process.

In making this request, St. Clair wishes to make clear its commitment to full cooperation with the Board in fulfilling its responsibilities under the CEAA and to undertaking a complete and comprehensive review of all environmental impacts associated with a project of this type.

St. Clair respectfully requests that the Board and CEAA reconsider their decision to commit the St. Clair and TransCanada projects to a comprehensive study process and to adopt instead an NEB substitute panel approach. We would be pleased to discuss this request with you at your convenience.

Yours truly,

Jeffry M. Myers
Vice President, Business Development

cc: Brian Fowler, TransCanada
Paul Jeffrey, TransCanada
L.E. Smith, Bennett Jones
J. Patterson, St. Clair
B. Parker, Canadian Environmental Assessment Agency
L.Ruemper, DFO
M. Dobbs, Environment Canada

R. Martila, Counsel to GAPLO – St. Clair
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