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File No: 2194

December 12, 2024

Environment and Climate Change Canada

Attention: Minister Guilbeault

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200 Sacré-Coeur Boulevard
Gatineau, QC K1A 0H3
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By Email and Registered Mail

Re: Failure of 500+ facilities owned by Canadian Natural Resources Limited (CNRL) to report emissions to the National Pollutant Release Inventory (NPRI) as required according to production data from Alberta's Petrinex system

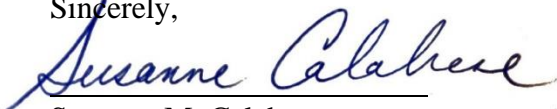
Dear Minister Guilbeault,

Attached, please find an Application for Investigation pursuant to section 17 of the *Canadian Environmental Protection Act* ("CEPA"), with a supporting expert report and attachments. We have discovered that more than 500 of CNRL's oil and gas facilities are failing to report dangerous air emissions - including benzene, volatile organic compounds and fine particulate matter - to the NPRI database. Indeed, a comparison of the production data in Alberta's Petrinex system shows systemic underreporting throughout the industry.

This Application is submitted by Deborah Donnelly, Executive Director of the Alberta Wilderness Association. It is also supported by Environmental Defence and Canadian Association of Physicians for the Environment (CAPE).

Thank you for your consideration of these matters.

Sincerely,



Susanne M. Calabrese
Barrister & Solicitor
Ecojustice

cc: Deborah Donnelly, Alberta Wilderness Association
Phillip Meintzer, Alberta Wilderness Association
Julia Levin, Environmental Defence
Emilia Belliveau, Environmental Defence
Dr. Joe Vipond, Canadian Association of Physicians for the Environment
Fraser Thomson, Ecojustice