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November 26, 2024

Via email Only: iaac.BaseMine-MineBase.aeic@canada.ca

Impact Assessment Agency of Canada

22nd Floor, Place Bell

160 Elgin Street

Ottawa, ON K1A 0H3

**RE: Suncor Energy Inc.
Base Mine Extension Project
Time Limit Adjustment – Impact Statement Phase
Canadian Impact Assessment Registry File No.: 80521**

Suncor Energy Inc. (Suncor) submits this letter to the Impact Assessment Agency of Canada (IAAC), pursuant to section 19(2) of the *Impact Assessment Act* (IAA), requesting the time limit to the Impact Statement phase of the Base Mine Extension Project (The Project) be adjusted.

Suncor’s vision is to be Canada’s leading energy provider, respected for our people, performance, sustainability and relationships that together create value-added contributions to society, communities, customers and shareholders. All plausible energy demand forecasts require fossil fuels and Suncor views Canada’s world class, strategic oil sands resource as a key part of the energy future for decades to come.

Since submitting the Project Description in 2020, significant changes to Suncor’s portfolio have occurred. These changes include the 2021 operatorship change for the Syncrude asset, as well as the 2024 acquisition of the Fort Hills asset in full. These both impact the timing and scope of bitumen replacement options to continue to supply the Suncor upgraders. As a result, the Project is one of several options under consideration and additional time is required to define and assess the range of opportunities. Much of the work to assess alternatives is expected to be carried out in 2025 and 2026.

In summary, Suncor requires additional time to: (i) support fulsome consideration of bitumen replacement options;(ii) continue to explore Project optimization to align with Suncor climate priorities; and (iii) to allow for consideration of potential implications of ongoing government initiatives on future investments. Specifically, Suncor requests a timeline extension of 46 months, thereby extending the current Impact Statement submission deadline from February 28, 2025, until December 28, 2028.

To support IAAC in its review of this request, Suncor is providing: (i) a work plan and a summary of the work carried out to date in progressing the development of the Impact



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Statement for the Project (Attachment 1) and (ii) the work plan to complete the Impact Statement (Attachment 2). The request for an adjustment to the time limit aims to preserve the significant value in progressing the Impact Statement and to ensure continued meaningful participation in the regulatory process by Indigenous communities and stakeholders when the work resumes.

As outlined in the work plan, preparation of the Impact Statement would resume in 2027. The additional time is needed to allow for remaining work and studies to be re-initiated and completed by Suncor and Indigenous communities when the Project resumes preparation of the Impact Statement in 2027.

Suncor appreciates IAAC's consideration of this request to adjust the time limit to recognize project-specific needs within the regulatory review process. If you have any questions regarding this request, please contact the undersigned.

Sincerely,

Isabelle Shelvey
Regulatory Affairs
Suncor Energy Inc.
BaseMineExtension@suncor.com



ATTACHMENT 1 – BASE MINE EXTENSION WORK SUMMARY

Below is a summary of work activities undertaken in support of the regulatory process for the Base Mine Extension (BMX) Project. The summary demonstrates the significant investment in advancing the environmental, social, and regulatory requirements as defined under the Impact Assessment Act. Since 2017, there has been material investment of time and resources by Suncor and participating Indigenous communities and stakeholders to advance through the regulatory process.

2017 / 2018
<ul style="list-style-type: none">• Fish Habitat Offsetting work, including review of work on the previously contemplated Voyageur South Project as compared to the proposed BMX Project to understand previous input by Indigenous communities and stakeholders• Preliminary Water Balance in connection with Syncrude Mildred Lake• Mine planning work, including Base Plant integration and dump closure• Pit Lake considerations for the BMX Project (TDS, GW seepage)• Poplar Creek assessment• Initial model development for Hydrogeology and Hydrology• Comprehensive field data collection programs, including water quality, waterbird survey, noise baseline, light baseline, quarterly groundwater sampling, fish and fish habitat surveys, winter tracking/remote cameras, and historic resources• Soil mapping of lease area• Review of Devonian and Buried Channel data in lease area• Wetland policy discussions and preliminary work• Application basis developed and Project Summary Table submitted to the Alberta Energy Regulator to support provincial terms of reference for the Environmental Impact Assessment (EIA)• Consultation and engagement with Indigenous communities and interested regional stakeholders
2019
<ul style="list-style-type: none">• Continued environmental baseline field work, including groundwater sampling, hydrology, water quality, fish and fish habitat, soils, wildlife automated recording units (ARU), wetlands• Compilation of environmental information collected• Model development for assessment of aquatic disciplines• Work on scope definition for the BMX Project, including geology, mine planning, tailings planning, closure and reclamation planning, geotechnical engineering, extraction, utilities and offsites• Developed and submitted the Initial Project Description (IPD) per the Impact Assessment Act

<ul style="list-style-type: none"> • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders
2020
<ul style="list-style-type: none"> • Preparation for air modelling, including emission inventories, model review and development, and climate change considerations • Continued environmental baseline field work, including groundwater sampling, drilling the Devonian geological formation, geochemistry data collection, water quality, radiological chemistry, fish and fish habitat, wetlands, and historic resources • Compilation of environmental information collected • Modelling for environmental assessment with focus on hydrogeology, water quality, pit lakes, and fisheries • Continued vegetation and soils mapping • Begin work with Indigenous communities on Traditional Ecological Knowledge and Indigenous Knowledge studies • Developed and submitted the Detailed Project Description (DPD) per the Impact Assessment Act • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders
2021
<ul style="list-style-type: none"> • Regulatory activities per the federal regulatory process, consultation and input related to Tailored Impact Statement Guidelines (TISGs) • Consultation with participating Indigenous communities and work related to: <ul style="list-style-type: none"> ○ Assessment cases ○ Valued Components (VCs) ○ Input on assessment methods • Assessment approach definition for the Peace-Athabasca Delta • Defined evaluation of scenarios for: <ul style="list-style-type: none"> ○ Water release ○ Accidents and malfunctions • Continued modelling work for aquatic disciplines • Compilation of environmental information collected • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders
2022
<ul style="list-style-type: none"> • Regulatory activities per the federal regulatory process • Continued consultation with Indigenous communities and continued work related to: <ul style="list-style-type: none"> ○ Definition and input on study areas for the impact assessment ○ VCs


<ul style="list-style-type: none"> ○ Assessment methods • Additional environmental baseline fieldwork focused on dust fall monitoring, night-time photographic survey, groundwater sampling, domestic / communal well reconnaissance and investigation, hydrology streamflow monitoring, water quality, aquatic health, fish and fish habitat, bat-specific ARU and hibernacula surveys, bird Species at Risk surveys, invertebrate surveys, and radiological chemistry • Site drainage alternatives assessment • Compilation of environmental information collected and data analysis • Continued modelling work for aquatic disciplines • Geochemistry analysis • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders
2023
<ul style="list-style-type: none"> • Regulatory activities per the federal regulatory process and continued work related to: <ul style="list-style-type: none"> ○ Study areas for the impact assessment ○ VCs ○ Assessment methods • Completed environmental baseline fieldwork on dustfall monitoring, hydrology streamflow monitoring, bat-specific ARU and hibernacula surveys, bird Species at Risk surveys, and radiological chemistry • Completed geochemistry analysis • Baseline data analysis • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders
2024
<ul style="list-style-type: none"> • Ongoing consultation and engagement with Indigenous communities and interested regional stakeholders

ATTACHMENT 2 – BASE MINE EXTENSION PRELIMINARY WORK PLAN


A preliminary work plan for the Base Mine Extension (BMX) Project is included below. The work plan should be reassessed as indicated and adjusted as required. Engagement with Indigenous communities and stakeholders for input may be required at Checkpoint #1.

BMX Work Plan

Activity	2025	2026	2027	2028	2029+
Bitumen Supply Assessment and BMX Decision by Suncor	Suncor: developing bitumen supply alternatives	Suncor: assessing portfolio of alternatives with decision on progressing BMX Project by end 2026			
Impact Statement (IS) work by Suncor			Complete baseline and assessment; start developing IS	Finalize IS and submit draft to IAAC by June 30, 2028	
IS input by Indigenous communities and stakeholders			Remaining work / studies to be completed by Indigenous communities and stakeholders		
Draft IS review by IAAC					Pre-application engagement with IAAC
IS submission by Suncor					Submit IS by December 28, 2028
Consultation and Engagement by Suncor	Bi-annual update meetings with Indigenous communities and key stakeholders. Annual project update newsletter.	Bi-annual update meetings with Indigenous communities and key stakeholders. Annual project update newsletter.	Offer monthly update meetings with Indigenous communities and key stakeholders. Provide multiple project updates (e.g., newsletters, web site updates) throughout the year. Hold open houses, public meetings, etc. as required.		



Checkpoint #1
December 31, 2026
Develop detailed plan for go-forward engagement with input from Indigenous communities and stakeholders



Checkpoint #2
June 30, 2028
Begin pre-application engagement with IAAC (~6 months prior to IS submission)