

CANADA BORDER SERVICES AGENCY

**The Dumping of
Certain Fabricated Industrial Steel Components
Originating in or Exported From
the People's Republic of China, the Republic of Korea,
the Kingdom of Spain, the United Arab Emirates and
the United Kingdom of Great Britain and Northern Ireland
and Subsidizing of
Certain Fabricated Industrial Steel Components
Originating in or Exported From the People's Republic of China**

**Public
Witness Statement of
Jean-François Blouin**

July 22, 2016

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*This document contains confidential information, the disclosure of which would cause
commercial harm to Supermetal Structures Inc.*

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*The Dumping of Certain Fabricated Industrial Steel Components
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1. My name is Jean-François Blouin. I am the President of Supermetal Structures Inc.
2. Supermetal is a producer and installer (erector) of fabricated industrial steel components ("FISC"). In addition to FISC, we fabricate and install structural steel for bridges and commercial buildings. Our main production facility is in Lévis, Quebec. We also have a large Canadian production facility in Sherbrooke, Quebec and a smaller facility in Leduc, Alberta. Supermetal also operates a plant in South Carolina, USA and offices in Montreal and the Philippines.

I. Supermetal

3. Supermetal produces FISC for projects in both eastern Canada and western Canada, including mining, power and oil and gas projects.
4. Supermetal is a major supplier of FISC in eastern Canada. Projects in this region requiring FISC have been relatively limited in the last three years; however, as discussed below, the presence of low-priced imports is disrupting the market.
5. FISC produced in Quebec for western Canadian project is transported by train or truck to Alberta, where it is then assembled into modules in a module yard, or is installed as stick components at the erection site. Like most other FISC fabricators, Supermetal also provides erection services, both in Alberta and in eastern Canada.

II. Unfairly priced import competition

6. Over the last several years, Supermetal has witnessed a significant competitive change in the Canadian FISC marketplace. Engineering, Procurement and Construction ("EPC") firms—those retained by large project owners to undertake a project from engineering

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through construction—and large project owners are frequently sourcing FISC from overseas suppliers. In many cases, domestic producers such as Supermetal are not being asked to bid or quote on supplying FISC. Rather, FISC is being sourced overseas from China, South Korea, Spain, the United Kingdom and the United Arab Emirates. This is a significant change over several years' prior when Supermetal would frequently supply many EPCs and owners with FISC. In other cases, Supermetal has been forced to lower its price in order to compete with low-priced FISC imports. Lower prices and lost sales have both resulted in material injury to Supermetal.

7. The price cutting by these foreign competitors is significant. Allan Metzger, an employee at Supermetal was advised by [] that they could acquire FSS from Korea or China for half of the cost of domestic producers, including overseas shipping. Metzger was also advised by representatives from [] that the price for FSS from China is at least 30% below the price of domestically produced FSS.
8. In my experience, EPCs and owners will only begin to consider purchasing FISC offshore if the price is at least 10% below domestic prices, including delivery to Canada. The discount required to consider purchasing offshore FISC increases depending on the risks and circumstances associated with the overseas supply. Factors affecting the discount include erection costs (offshore suppliers may fabricate components that are better for transport (smaller and lighter) but are costlier to erect), shipping delays, unfamiliar producers, warranty issues (challenges having components repaired or altered), payment issues (e.g. requiring lines of credit), and the purchaser's comfort with the associated risks. In some cases, firms may not consider offshore FISC supply until the discount over domestic pricing reaches 25%.
9. Below is a discussion of several projects that have resulted in material injury to Supermetal.



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A. Vale Long Harbour Nickel Processing Plant

10. Vale is a mining firm with headquarters in Brazil. Its Long Harbour Processing plant processes mined nickel concentrate into finished nickel, copper and cobalt. It was reported that the project was to cost \$4.25 billion dollars.¹
11. The contract to supply the FISC for this project was awarded in 2011. However, given the size of the project and based on my knowledge of the project and the industry, I believe that FISC for the project would have been fabricated and delivered between 2011 and 2014. I estimate that the Long Harbour project would have required approximately 33,700 MT of FISC.
12. Supermetal bid on the supply of the FISC for this project; however, it was awarded to William Hare from the United Kingdom. I believe that the only reason that it was awarded to William Hare is that their price was significantly below Canadian market pricing. Given the cost of manufacturing the UK and the added cost of shipping FISC over the Atlantic, I believe that William Hare was dumping FISC into Canada.
13. We bid on [] MT while the the remainder, representing approximately 20,000 MT, was negotiated solely with William Hare.² Our bid price was approximately \$[]. William Hare was awarded the entire project. Based on our unit price for our bid, I estimate that the value of the project to the domestic industry was approximately \$[].
14. Fluor Canada, the EPC on the project, indicated that William Hare's price was approximately []% below Supermetal's price. I believe and understand that this price difference included delivery. Nonetheless, assuming that the cost to ship to Newfoundland from Montreal or the UK is approximately the same, thereby making Fluor's price difference indication applicable on both a delivered and ex-works basis, I

¹ Public Attachment 1: CBC News, "Long Harbour production should start in 2013" (March 30, 2013).

² Confidential Attachment 2: "Unit Rate Schedule for Fabricated Structural Steel."

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estimate that William Hare was dumping by a margin of []% of its ex-works selling price.

B. MEG Energy

15. MEG Energy (“MEG”) is an oil sands company operating in the Athabasca region of Alberta. Supermetal has been a preferred supplier for MEG for several years.

16. In October 2015, Supermetal was asked to quote on two small orders of FSS for MEG: the “Worley Parsons RFQ”, and the “Drum Boiler Bldg”.

17. Supermetal was asked by MEG Energy to reduce its pricing by []%.³ In a conversation that followed, [

] likes to work with Supermetal; however, it was under pressure to reduce costs. [] advised Supermetal that his superiors instructed him to get a lower price on FSS or to go to Asian suppliers.

18. On [], Supermetal advised MEG that it could reduce its quote on the []%, which is equal to approximately \$[].⁴ Supermetal also advised MEG Energy that it could reduce its quote on the Drum Boiler Building by []% or \$[]. This discount was attributable to [].

19. MEG Energy procured the FISC for the “Worley Parsons RFQ” from Supermetal; however, the Drum Boiler Building was cancelled.

20. MEG was planning on a large project called Phase 3A. [].

³ Confidential Attachment 3: [].

⁴ Confidential Attachment 4: [].

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C. Brion Energy

21. Brion Energy is a wholly owned subsidiary of PetroChina Company Ltd. PetroChina's website states that it is a state-owned enterprise.
22. In 2013, Worley Parsons was selected as the Engineering, Procurement and Construction firm for a Brion project in Fort McKay. The project was the construction of a Steam Assisted Gravity Drainage ("SAGD") system. SAGD is a technology that pipes steam into underground oil sands reserves in order to extract bitumen.
23. Supermetal was interested in this project; however, it was not given the opportunity to bid on the project. Supermetal was advised that the owner of the project—PetroChina—insisted on sourcing the FISC from China. Supermetal did, however, erect part of the project into modules in its Leduc modularization yard.
24. Based on my understanding of the scope and size of the project and our knowledge from constructing the modules, I estimate that the volume of FISC for the project was approximately 3,000 MT. Further, I estimate that if Supermetal or another domestic producer had fabricated FISC for the project, its price would have been in the range of \$11,000,000. I estimate that the FISC for the project arrived in the second half of 2014 and 2015.

D. Suncor – Fort Hills – Utilities and offsite

25. The Fort Hills Partnership is a major oil sands development. Suncor Energy has a majority interest in the project. Several different silos or elements of the project were distributed among several EPCs. Fluor was awarded the EPC contract for the utilities and offsite component, valued at over \$1.3 billion dollars.⁵
26. Fluor issued a RFQ to Supermetal for the supply of FISC for the entire utilities and offsite ("U&O") portion. Supermetal submitted a bid in response.

⁵ Public Attachment 5: Fluor, Press Release: Fluor Secures Canadian Oil Sands Contract (September 23, 2014).

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27. The supply of FISC for the U&O portion of the project was also awarded to Baosteel, a state-owned firm in China. Baosteel was running behind schedule and Fluor placed a purchase order with Supermetal for approximately [] MT of FISC for the project. The value of the order was approximately \$[]. A few weeks after the order was placed with Supermetal, Fluor cancelled the order in 2015 and returned it to Baosteel. Supermetal was advised that the reason for the cancellation was that Baosteel was now able to do this portion of the U&O project as well. Supermetal was paid a small cancellation fee of \$[] to cover only direct costs incurred.⁶

E. Suncor – Fort Hills – Cogeneration

28. Another component of the Fort Hills project is the cogeneration facility. Oil and gas projects require significant volumes of electricity and steam. A cogeneration facility is an on-site power plant facility that generates electricity using natural gas. In some cases, excess electricity will even be sold to public utilities.
29. TR Canada was awarded the EPC contract for the Fort Hills cogeneration facility.⁷ To my knowledge, no domestic FISC producer was asked to quote or bid on the supply of FISC for this project.
30. Based on my general knowledge of cogeneration facilities and the Fort Hills project, I estimate that a project of this size would require approximately [] MT of FISC and that the domestic price of FISC for a project like this would be approximately \$[].

F. CNRL – Corrosion Inhibitor Facility

31. CNRL retained TR Canada as the EPC on the construction of a corrosion inhibitor facility for the project. The corrosion inhibitor facility blends chemicals into bitumen or

⁶ Confidential Attachment 6: Change Order, dated August 28, 2015.

⁷ Public Attachment 7: TR Canada (website), Projects in Canada: Fort Hills Cogen Project.

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synthesized oil and gas products retrieved from bitumen so as to reduce its corrosive properties. The FISC for this project was to be delivered in the first half of 2015.

32. I am not aware of where TR Canada has sourced the material. However, I believe that it is likely from one of the five countries that are the basis of this complaint as I have not heard that any domestic or US FISC producer acquired the project. I am also not aware of imports from any other country offering FISC for projects such as this.

33. Based on my general knowledge of the project and the industry, I estimate that it would have required approximately [] MT of FISC and that it would have resulted in \$[] revenue for the domestic industry.

G. Mount Milligan Copper-Gold Mine

34. The Mount Milligan Copper-Gold Mine is located north of Prince George, BC. It is owned and operated by Terrane Metals Corp. The EPC was a joint venture between Fluor Canada and Amec Foster Wheeler.

35. Supermetal bid to supply the [] MT of FISC for the project at a price of \$[].⁸

36. In 2011, Fluor and Amec selected William Hare from the UK as the supplier of FISC. Based on my general knowledge of the project, I estimate that between the first quarter of 2012 and the second half of 2013, William Hare would have delivered approximately [] MT of FISC to this project. The value of this FISC to the Canadian industry was equal to approximately \$[] in revenue.

⁸ Confidential Attachment 8: "Unit Rate Schedule For Structural & Miscellaneous Steel Detailing, Fabrication & Supply"

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H. Husky – Sunrise SAGD

37. The Husky Sunrise Energy Project is located near Fort McMurray, Alberta. The project utilizes steam assisted gravity drainage technology to extract bitumen from below the surface without open pit mining.
38. The EPC on the contract was Saipem. Supermetal was not asked to bid or quote on this portion of the project, and, to my knowledge, nor were other domestic FISC producers. Instead, the EPC sought FISC supplied from overseas, ultimately procuring FISC from an unknown supplier in China.
39. Based on my knowledge of the industry and this project, I estimate that the project would have required approximately [] MT of FISC. My conservative estimate on the value of the FISC for this project is \$[]. I estimate it would have been delivered between the second quarter of 2012 and the first half of 2014.

I. CNRL – Train 4/5 - HWS4

40. CNRL's Horizon Project is a major oil sands project in Alberta. It is currently undergoing significant expansion. One aspect of this expansion is the HWS4.
41. The EPC on the HWS4 is Krupp. Krupp asked Supermetal to provide a quote for approximately [] MT of FISC. Our price was approximately \$[]. Krupp awarded the project to an unknown Chinese supplier.
42. Supermetal has prepared a dumping example for this project. The example was prepared using Supermetal's costs that underlined our bid price, adjusted for Chinese production, to calculate a Chinese fully absorbed cost of production plus profit. The offshore delivered price was estimated at []% below Supermetal's price, based on previous comments from Krupp as to the price difference between domestically supplied FISC and Chinese FISC. I believe that the Krupp price difference includes shipping. As such, \$303/MT has been removed from the Chinese bid price to account for shipping. On this basis, we estimate that the Chinese product was sold below its fully absorbed cost plus

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profit by a margin of []% to []% of its ex-works or FOB price and that it was subsidized by a margin of []% of its ex-works or FOB price.

J. Other Projects

43. Additional projects award to Chinese, Korea, UK, UAE and Spanish FISC producers that Supermetal would have bid if given the opportunity include:

- a) *Fort Hills Bitumen Extraction Facility (Modules)* (EPC: SK Engineering)
- b) *Fort Hills – Ore Processing Plant* (EPC: FAM)
- c) *Fort Hills Mine Extraction* (EPC: WorleyParsons)
- d) *Canadian Natural Resource Limited (CNRL) – Horizon Oil Sands – Delayed Coking Unit* (EPC: Tecnip Italy)
- e) *Syncrude – Mildred Lake Mine Replacement –Slurry Buildings; Surge Bins* (EPC: Krupp)
- f) *CNRL – DCU Expansion* (EPC: Tecnip Italy)
- g) *CNRL – DCU Fire Rebuild* (EPC: Tecnip Italy)
- h) *CNRL – 4/5 Ore Preparation Plant* (EPC: FAM)
- i) *North Red Water Partnership – Sturgeon Refinery – Units 50-60*
- j) *Rio Tinto Alcan – Kitimat Aluminum Smelter Expansion.*

III. Injury

44. When considering injury, it is important to understand the marketing dynamics of FISC production. In general, there is an 8-12 week period between when an order for FISC is placed and before production can begin. In this period, the design may be completed and revised by the customer and our team of engineers and drafters will complete the required

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engineering and shop drawings. In some cases, production will not begin until a later period.

45. Once production begins, it can last a few weeks or extend over 18 months, depending on the project. On larger projects, production will occur according to a schedule so that steel can be transported and erected as it is produced. This limits the need to store finished components. In general, we will invoice as product is shipped to the site.
46. In light of these circumstances, our financial statements may not reflect injury from a lost project or lost opportunity to bid for more than a year. Similarly, an income statement may show healthy returns despite the fact that Supermetal does has lost projects over an extended period as we produce to meet earlier orders.

A. Lost Sales

47. Supermetal is competitive in the FISC sector. Supermetal uses advanced technology and has a skilled, productive workforce that enables it to produce quality product at a reasonable cost. It has been able to compete with large FISC producers in western Canada, including Supreme and Waiward, and it has been a major supplier in eastern Canada. It has also competed successfully with FISC imports from the United States. Supermetal remains competitive in the commercial FISC market, a market that has yet to experience unfairly priced imports.
48. In the industrial FISC sector, we are increasingly not being asked to bid. Instead, EPCs are going directly to foreign suppliers based solely on price. The fact that we are not even given the chance to bid is illustrative of the price difference.

B. Production Orders

49. Supermetal's annual production capacity for FISC and other fabricated structural steel products is approximately []. Given the long lead time on projects, the downturn in the price of oil did not affect FISC orders until 2015, and therefore, the effects of the downturn in oil is not relevant with respect to our FISC business until mid-2015 and early



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2016. Unfair import competition, however, did affect our production in 2013 through 2016. Our production of FISC dropped from [] MT in 2013 to [] MT in 2014 and [] MT in 2015. In the first quarter of 2016, our FISC production was only [] MT. In other words, Supermetal's capacity utilization rate for FISC dropped from []% in 2013 to []% in the first quarter of 2016. Given the number of Canadian projects awarded in 2013 through 2015, I would have expected our production increase over this period. Consequently, the number of Supermetal employees working with FISC production has dropped from [] in 2013 to [] in the first quarter of 2016. Almost all of the lost jobs were production jobs.

50. FISC is the heart of our production. We also produce structural steel components for bridges and commercial structures; however, this is secondary to our FISC production. As a result of the loss of projects to unfairly priced FISC imports, production of non-FISC structural components has increased from []% of our total production in 2013 to []%. Nonetheless, the increase in non-FISC production have not offset the loss of FISC production. Further, the non-FISC business has traditionally generated a lower profit margin than FISC business.

51. Over the last 3 years, Supermetal generally booked FISC production []. After June 2016, I expect that Supermetal's FISC production will consume only []% of Supermetal's production capacity, down from []% in 2013. Consequently, Supermetal is very likely to have []. Were it not for our non-FISC production for commercial projects and bridges, our firm would have to layoff far more employees and our situation would be far worse.

52. This is very troublesome for our firm. Supermetal is very concerned for its employees and how this will affect their families.

53. Further, Supermetal expects that it will face very challenging times in the near future. In response, we are looking to other sectors, in particular the commercial sector both in

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Canada and the US. That said, Supermetal has expertise in the industrial sector and this has been a core focus of our production business.

C. Financial Results

54. The loss of projects to unfairly priced imports has affected Supermetal's financials. In 2013, Supermetal's net income on FISC production was \$[] which is approximately []% of revenue. This net income is already very tight. Given the nature of FISC supply and the associated risks, including delays and unforeseen production costs, we generally prefer to have net income of []%. Our net income was tight in large part because we were already feeling the pressure of unfairly traded imports. In 2014, our net income on FISC production was \$[], despite []. In 2015, our net income on FISC production was \$[]. However, we cut our GS&A by \$[] between 2013 and 2015, and []. Supermetal's belt tightening was challenging, however, it was necessary in order to sustain FISC production over the period.
55. I am very concerned about the future viability of Supermetal's FISC production over the next two to three years. With the downturn in oil and other commodity prices, FISC producers globally and domestically are fighting for fewer projects, meaning FISC pricing is becoming increasingly aggressive. We have cut costs where we can to remain competitive, however, we still find ourselves being passed over on bid requests because EPCs know they can acquire FISC from overseas producers at very low prices. While we continue to produce structural components for non-FISC projects, I fear that we will be shut out of FISC production unless offshore FISC producers are forced to compete fairly.

I, Jean-François Blouin, President of Supermetal Structures Inc., certify that the information in the Witness Statement is true, accurate and complete.


Jean-François Blouin

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List of Attachments

Tab	Description
1	CBC News, "Long Harbour production should start in 2013" (March 30, 2013)
2	"Unit Rate Schedule for Fabricated Structural Steel." [Confidential]
3	[]. [Confidential]
4	[]. [Confidential]
5	Fluor, Press Release: Fluor Secures Canadian Oil Sands Contract (September 23, 2014)
6	Change Order, dated August 28, 2015. [Confidential]
7	TR Canada (website), Projects in Canada: Fort Hills Cogen Project
8	"Unit Rate Schedule For Structural & Miscellaneous Steel Detailing, Fabrication & Supply" [Confidential]

Long Harbour production should start in 2013

[CBC News](#) Posted: Mar 30, 2013 11:05 AM NT Last Updated: Mar 30, 2013 2:24 PM NT



Jeff McLaughlin, vice-president of Vale's Newfoundland and Labrador operations, says the company will begin processing ore from Indonesia later in 2013. (CBC)

Mining giant Vale said the company should be set to begin nickel processing in Long Harbour later this year. The company said it will use imported ore from Indonesia, not Voisey's Bay, to get the facility up and running.

Jeff McLaughlin, vice-president of Vale's Newfoundland and Labrador operations, said the ore from Indonesia is purer than the Labrador product.

"It's an extremely pure product. The grade's about 70, 80 per cent nickel, whereas the grade of the material coming out of Voisey's Bay is 20 [per cent]," McLaughlin said.

"By using this purer product, we can utilize elements of the plant that are already completed to get us into production, start training our operators, and producing product from the province."

He said operations will start in Long Harbour in the second half of 2013, and ore from the Voisey's Bay mine will be gradually introduced to the facility in 2014.

The latest price tag on the Long Harbour facility is \$4.25 billion.

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**Public Summary of
Confidential Attachment 2**

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**Public Summary of
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**Public Summary of
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Fluor Secures Canadian Oil Sands Contract

Release Date:

Tuesday, September 23, 2014 4:05 pm EDT

Terms:

[Company](#) [Energy and Chemicals](#) [Fluor](#) [North America](#) [Business Groups](#) [Regions](#)

Dateline City:

IRVING, Texas & CALGARY, Alberta

IRVING, Texas & CALGARY, Alberta--(BUSINESS WIRE)--Fluor Corporation (NYSE: FLR) was awarded an engineering, procurement, fabrication and construction contract by Fort Hills Energy L.P. for the utilities scope of the Fort Hills oil sands mining project. The project is located about 90 kilometers north of Fort McMurray in Alberta, Canada. Fluor booked the contract for \$1.3 billion in the third quarter of 2014.

"Fluor looks forward to delivering our integrated engineering, procurement, fabrication and construction solution to this significant project in Canada's Athabasca oil sands," said [Jim Brittain](#), president of Fluor's Energy & Chemicals business for the Americas region. "Fluor will apply our unique modular design and execution approach using our proprietary 3rd Gen Modular ExecutionSM technology. We will fabricate a significant number of components offsite in order to deliver both schedule and capital efficiencies to Fort Hills."

The Fort Hills project will be developed as an open-pit truck and shovel mine and is planned to yield 180,000 barrels of bitumen per day at full production. First oil is expected as early as the fourth quarter of 2017.

The Fort Hills project is owned by Fort Hills Energy L.P., a partnership between Suncor Energy, Total E&P Canada Ltd. and Teck Resources Limited.

About Fluor Corporation

Fluor Corporation (NYSE: FLR) is a global engineering and construction firm that designs and builds some of the world's most complex projects. The company creates and delivers innovative solutions for its clients in engineering, procurement, fabrication, construction, maintenance and project management on a global basis. For more than a century, Fluor has served clients in the energy, chemicals, government, industrial, infrastructure, mining and power market sectors. Headquartered in Irving, Texas, Fluor ranks 109 on the FORTUNE 500 list. With more than 40,000 employees worldwide, the company's revenue for 2013 was \$27.4 billion. Visit Fluor at www.fluor.com and follow on Twitter [@FluorCorp](#).

□

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English

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Ticker Slug:

Ticker: FLR
Exchange: NYSE
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US3434121022

Source URL: <http://newsroom.fluor.com/press-release/company/fluor-secures-canadian-oil-sands-contract>

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**Public Summary of
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Projects in CANADA

Text to search...:

Type of project:

All

Search

FortHills Cogen Project

Client: FortHills Energy LP

Location: Alberta (Canada)

Year: 2014

Features:

Project Value: -

Duration: August 2014 - April 2017

Status: Awarded

TR Role: EPC Contractor

Type of Contract: EPC LSTK Contract



Description:

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Attachment 7

FortHills Cogen Project - Projects in CANADA - Projects - Tecnicas Reunidas Canada

Public

2016-05-03, 11:18 AM

Engineering, Procurement and Construction in a LSTK contract for
Cogeneration plant for Fort Hills Energy LP

#2 7F GE Gas Turbines

#2 Nooter/Eriksen HRSG

Modular Dsign

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