

**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  
Paul Zubick**

July 22, 2016

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*This document contains confidential information, the disclosure of which would cause  
commercial harm to Supreme Group*

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**Table of Contents**

<b>I.</b>	<b>Supreme Group LP.....</b>	<b>1</b>
<b>II.</b>	<b>FISC: procurement and production .....</b>	<b>2</b>
	<b>A.</b> Bidding Process .....	2
	<b>B.</b> Production.....	3
	<b>C.</b> Production methodology based on transportation infrastructure.....	4
	<b>D.</b> Capacity of domestic industry .....	7
<b>III.</b>	<b>Lost Projects.....</b>	<b>7</b>
	<b>A.</b> Chinese Imports .....	8
	1. Rio Tinto Alcan – Kitimat Smelter Expansion.....	8
	2. Fort Hills Mine Extraction.....	9
	3. Fort Hills Secondary Extraction .....	10
	4. Fort Hills Utilities and Offsite .....	10
	5. Fort Hills Cogeneration Power Plant .....	11
	6. Sturgeon Refinery - Hydrotreaters.....	11
	7. LaFarge Baghouse .....	12
	<b>B.</b> South Korea .....	13
	1. NRWP Sturgeon Refinery Units 50-60 .....	14
	<b>C.</b> Spain .....	16
	1. CNRL – Horizon Upgrader (U31A, U31, and U32) .....	16
	2. Laricina – Saleski Project .....	19
	<b>D.</b> Other Projects .....	19
<b>IV.</b>	<b>Effect on Supreme Group .....</b>	<b>20</b>
	<b>A.</b> Lost Opportunities .....	20
	<b>B.</b> Price Depression .....	21
	<b>C.</b> Production and income .....	21
	<b>D.</b> 2016 – production and financials.....	23
	<b>E.</b> Market – 2016 and 2017 .....	24

**V. Conclusion .....24**

**List of Attachments.....25**

**Public  
Witness Statement of Paul Zubick**

*The Dumping of Certain Fabricated Industrial Steel Components  
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1. My name is Paul Zubick. I am Chief Operations Officer at Supreme Group LP. I have been employed in the Fabricated Industrial Steel Components (“**FISC**”) industry since 1984. I have been employed at Supreme Group as COO since 2013. Prior to that I was vice-president of sales and contracts at Waiward Steel Fabricators Ltd., another FISC producer.
2. Unless stated otherwise, reference hereafter to “FISC” is specific and limited to the “like goods” as defined in the associated Complaint filed by Supreme and others under the *Special Import Measures Act*.

**I. Supreme Group LP**

3. Supreme Group LP is the parent company of several FISC manufacturing operating companies in Canada. Supreme Group LP’s head office is located in Edmonton, Alberta. Supreme’s fabrication business focuses primarily on the FISC sector, namely producing fabricated structural steel and certain plate-work components for “industrial” projects, namely oil, gas and mining projects. I estimate that over the last several years 85% of our steel fabrication production was for industrial uses. Apart from FISC, Supreme also fabricates steel components for bridges, “commercial” projects (such as buildings and warehouses) and industrial end uses that are not “like goods”.
4. Supreme Group has 12 separate operating companies. Five core operating companies operating under “Supreme Steel LP” and one core operating company operating under Canron Western Constructors Ltd produce FISC and are directly affected by dumped and subsidized FISC imports from China, the United Kingdom, Spain, South Korea and the United Arab Emirates. The operating companies are:

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

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- a) Supreme Steel Edmonton, Acheson Alberta
  - b) Supreme Steel Bridge (also produces FISC for industrial projects), Edmonton Alberta
  - c) Supreme Steel Saskatoon, Saskatoon , Saskatchewan
  - d) Supreme Steel Winnipeg, Winnipeg, Manitoba
  - e) Supreme Steel Hopkins, Welland, Ontario
  - f) Canron Western Constructors Ltd, Delta, British Columbia
5. In addition to the Supreme Steel LP companies, Quality Fabricating and Supply LP located in Edmonton, also an operating company of Supreme Group, can and does produce industrial FISC when required.
6. In addition to FISC and other structural steel fabrication Supreme Group provides steel structure erection services and produces other steel products, such as pressure piping.
7. Supreme Group has been a major supplier of FISC to western Canadian industrial projects for over 30 years. Supreme Group has not imported FISC during the period of review covered by this complaint.

**II. FISC: procurement and production**

**A. Bidding Process**

8. Most owners of projects requiring FISC (e.g. an oil company or mining company) will hire a single firm to oversee and manage various aspects of the project. This firm may be responsible for the engineering, procurement and often construction of the project and is colloquially referred to as an EP or EPC. An EPC contract for only a portion of a single project may range from a couple of hundred million to several billion dollars. An EPC may directly approach an FISC producer or it may issue a Request for Quotes for FISC

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

for a specific contract. The contract may be limited to FISC only or include both FISC production and erection. Alternatively, an EPC may ask Supreme Group to erect FISC produced by another firm (e.g. FISC sourced from outside Canada). Occasionally, an owner of a project may procure FISC production and installation, rather than use an EPC, or a project owner may direct an EPC to source FISC from a particular company or region.

9. The procurement process for FISC, whether by way of bids or if sole-sourced, may involve some back and forth with an EPC. For example, following the receipt of bids there may be design or technical changes in order to reduce costs or in light of comments provided by FISC producers.
10. It is not uncommon for an owner to award various phases of a project to different EPCs. The purpose of doing so is to reduce risk by not putting all of one's eggs in a single basket. For example, 3-4 different EPC's may have a contract for different aspects of a multi-billion dollar oil extraction development. An EPC will generally only procure FISC for a single silo from a single FISC producer.

**B. Production**

11. FISC is primarily produced from structural shapes (columns, beams, angles) and plate; however, fasteners, bars, rods, grating, hollow structural sections and hot-rolled sheet may also be used. Using plans designed by the project's design engineer (EPC), an FISC producer will fabricate precise components for the project in a factory. The production process includes cutting, bending, drilling, welding, punching, and connecting various inputs precise components. These components may be welded or connected using bolts. The FISC producer is typically responsible for engineering the connections to resist the required design forces.
12. Once fabricated, the components may then be delivered to the project site and assembled into the structure. Alternatively, the components may be modularized at a modular site.

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

13. Modularization is the partial erection or construction of the structure. It is done off-site for cost saving purposes, as labour is much more expensive at many of the remote locations where structural steel is erected. Further, it can be safer and more efficient to assemble pieces of the structure into modules on the ground and then install the module on the structure, rather than assembling the same individual components at significant heights.
14. Production and delivery of FISC depends on the type of project. Production may begin several months or more than a year after the award of a contract, depending on the project's timeline and when specific components are required. Production for a single project may take several months or years depending on when various components are to be delivered. Production will generally follow a specific erection plan.
15. A typical fabrication project will require between 15 and 20 hours of shop time per tonne of fabricated steel. Plate work can be far more time consuming and costly on a per tonne basis as there can be 40 to 80 hours of shop time per tonne. FISC generally accounts for between 5-7% of the final cost of a project.
16. Erection of FISC is frequently awarded with the production of FISC. Supreme Group, like most industrial FISC producers, provides erection services. A FISC erector and producer must be coordinated so that the structural steel is erected in an efficient and safe manner.
17. When an FISC producer does not offer erection services in a particular region it may subcontract this aspect of a project to local erection company, including a local FISC producer.

**C. Production methodology based on transportation infrastructure**

18. The FISC supplied for a particular project will meet the engineering and design requirements set out in the project's construction and design documents regardless of which producer fabricates the steel. That said, a FISC producer will fabricate particular

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

components in such a manner to ensure that they can move efficiently along transportation corridors.

19. In general, FISC produced overseas will be fabricated in such a way so that it can fit into 40 foot sea containers for transportation, whereas domestically produced FISC can be fabricated so it can fit on flatbed transports, which accommodate longer and taller pieces. It follows that a particular component may have a higher production cost in order to accommodate transportation corridors. For example, a structure's design plans may call for a simple component that is a long and heavy horizontal beam with plates welded to each end so that it can be connected to vertical columns with fasteners. North American producers would take a long unworked beam, cut it to length, fabricate the connection plates for the end connections (including precision drilling of holes), and weld these connection plates to the beam. Conversely, a producer shipping from overseas would follow the same fabrication steps as the domestic producer, however, it would also cut the beam in half so that it could efficiently fit in a sea container. In addition, it would engineer and fabricate splice plates so that the two pieces could be reassembled with fasteners into a single component once delivered to the construction site. In the end, the beam fabricated domestically and overseas are functionally interchangeable and both meet the necessary requirements and design specifications. However, the component produced overseas requires more fabrication which in turn, results in a higher cost. It also requires slightly more material, such as splice plates and welds or fasteners.
20. A 2013 cost study by a third-party consultant estimated that for the same project, FISC delivered on flat-bed trucks would have 5.5 pieces (and therefore 11 connections) per metric tonne, whereas FISC delivered in containers would have 7.3 pieces per metric tonne.<sup>1</sup> While the number of pieces will vary across each project, based on my experience and industry knowledge, I believe this is a fair ratio. On this basis, I have

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<sup>1</sup> Confidential Attachment 1: [

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at p. 11.



**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

done a calculation as to what the cost difference would be between the two production methods—the first using 5.5 pieces per tonne and second using 7.3 pieces per tonne.<sup>2</sup> For the calculation I assume that the project size is 100 tonnes and that the domestically produced FISC requires 92 tonnes of “main material” and 8 tonnes of connection material. This ratio will also vary from project to project, however, in my experience and opinion, 92 MT of main material to 8 MT of connection material is a fair estimate to apply across most projects. Using this ratio, the total domestic production weight of 100 MT and the 5.5 pieces per MT estimate, each connection would weigh an estimated 15 kg.

21. For the overseas production (i.e. producing to fit into sea containers), I also use the 92 MT of main material. However, with 7.3 pieces per tonne, and 15 kg per connection, it is estimated that the second production method would result in a total weight of 102.6 MT (92 MT of main material and 10.6 MT of connection material) as a result of the extra connection pieces.
22. I calculated the cost difference between the two types of production methodology based on man-hours of shop fabrication. This calculation estimates that it takes 12 man-hours per MT to fabricate the main material and 85 man-hours per tonne to fabricate the connection material. These estimates are based on my experience in producing FISC. Applying these estimates and costs to the domestically produced FISC, the labour cost is 1,783 man-hours to produce 100 MT or 17.8 man-hours per tonne. Applying the same costs to overseas production—92 tonnes of main material and 10.6 tonnes of connection material—the labour cost is 2,007 man-hours or 19.6 man hours per tonne. Therefore, the production methodology used to produce an identical product in such a way that it fits in sea containers will resulting in an extra 9.6% in labour costs.

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<sup>2</sup> Confidential Attachment 2: Production Cost Adjustment Analysis.

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

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23. Further, there is extra material costs associated with the sea container fabrication method. The extra 2.6 tonnes of material at an average cost of \$1,212 per tonne would add \$3,173 to the total cost of the project, or \$31.73 per tonne.
24. In light of the fact that Subject Country producers will produce FISC pieces to fit into sea containers while North American producers will rely on flatbed transport, it is reasonable to adjust the cost of production in the Subject Countries by adding 9.6% to their labour costs and \$31.73/MT to their material costs.

**D. Capacity of domestic industry**

25. Some project owners, such as Imperial Oil on the Kearl Initial Development project and Suncor on the Fort Hills project, have suggested that they require FISC supply from overseas because there was insufficient capacity in the domestic market. I firmly dispute this statement. Supreme and other Canadian FISC producers have had the excess capacity to meet demand for domestic projects over the last few years, including for the projects listed below. Further, there is significant production capacity in the USA and Mexico. Nonetheless, in the case of many recent projects, EPCs and owners bypassed all North American producers, without even requesting a quote or consulting on their capacity, and sourced the supply of FISC from offshore suppliers in China, Korea, Spain, UK and UAE.

**III. Lost Projects**

26. The presence of offshore FISC in the Canadian market was relatively limited until 2011 when it started to grow significantly year-on-year. Over the last several years, I have witnessed an increasing presence of low priced FISC imports from China, Korea, the United Kingdom, and Spain in the Canadian market. We have lost bids to FISC suppliers to these countries. We have also been passed over by EPCs who choose to source from these countries without even requesting a bid from Supreme or other domestic producers. I believe that we have lost bids and been passed over because FISC suppliers from these countries are supplying the Canadian market with unfairly priced goods. Below is a

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

discussion of a handful of such projects. I should add that although I do not have direct knowledge of imports from the UAE, I am aware that the UK producer William Hare also has a facility in the UAE, and based on the import statistics, it appears to me that some of William Hare's sales to Canada are likely made from that UAE facility.

**A. Chinese Imports**

**1. Rio Tinto Alcan – Kitimat Smelter Expansion**

27. Rio Tinto Canada operates an aluminum smelter in Kitimat, British Columbia. After almost 60 years of operation the smelter is undergoing a modernization upgrade.
28. In November 2011, Supreme was asked to bid on the construction of the FISC for the project. We inquired as to who was supplying the FISC. Bechtel, the EPC on the project advised that the FISC was being sourced from China. The particular supplier was not specified. Supreme was not asked to bid or quote on the supply of FISC for this project. Had it been given the opportunity it would have submitted a competitive price. At the time I was employed at Waiward and it is my recollection that Waiward did receive an RFQ for the project. However, the RFQ was completely designed for Chinese supply—specifications were in Chinese grades and logistics provisions were designed for ocean going freight. It was clear that the decision had been made to supply the project with FISC from China, even before a domestic price was acquired. Believing it was a lost cause, Waiward did not bid the project and to my knowledge no other domestic FISC producer submitted a bid.
29. Based on my knowledge of the project generally, and my knowledge acquired from submitting a bid to construct the FISC, I estimate that the project would have required approximately 17,700 MT for the Reduction Area and Main Substation and a further 9,365 MT for the Carbon and Casthouse, totaling 27,065 MT. I estimate that the FISC for this project would have been delivered from early 2012 through the third quarter of 2013.
30. This project is significant. To my knowledge it was the first major project in western Canada where the domestic industry was not asked to bid.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

**2. Fort Hills Mine Extraction**

31. Fort Hills Project is an open-pit oil sands mine development. Its majority owner is Suncor Energy Inc., however, Total E&P Canada Ltd. and Teck Resources Limited have minority ownership interests. It is estimated that the lifespan of the project will be 50 years and that it will produce 180,000 barrels of bitumen per day at full production. The project includes several silos that require FISC. Each of these phases is sufficiently large that they have been awarded to separate EPCs.
32. One component is the construction of the primary extraction facility. The primary extraction facility receives feedstock from the ore preparation plant (OPP) in the form of crushed and graded Oilsands material. The material is mixed with water in a Slurry Plant and directed to separation cells where the bitumen is separated from the sand. Detailed engineering for the Slurry Preparation, Primary Extraction and the tailings facility was awarded to WorleyParsons in a contract worth an estimated \$140 million.
33. Canadian FISC producers were not invited to bid on the fabrication component of this project. Instead, Worley awarded the project to Baosteel, a state-owned Chinese FISC producer. If given the opportunity, Supreme Group would have bid on this project.
34. I am not aware of the volume or value of FISC for this project. However, based on my general knowledge of the project and experience in the industry, I estimate that a project like this would require approximately 5,000 MT of FISC. Using a rough and conservative estimate of \$3,500/MT as the price at which domestic industry would have produced FISC for such a project, I estimate that the loss of this project cost the domestic industry \$17,500,000 in revenue.
35. I estimate that FISC for this project began to arrive in first quarter of 2014 and continued to arrive throughout 2015.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

### **3. Fort Hills Secondary Extraction**

36. Another component of the Fort Hills project is the Secondary Extraction (Froth Treatment) facility. The Secondary Extraction facility receives feedstock from the Primary Extraction process and further processes the bitumen. One of the largest contracts was awarded to South Korean firm SK E&C for engineering and construction. SK E&C reported the contract to be worth \$2.55 billion for both Detailed Engineering and construction of modules.<sup>3</sup> The company had previously completed Front-End Engineering (FEED) for Fort Hills in Seoul, South Korea. There are an estimated 600 modules in the entire Secondary Extraction facility. All of the FISC for this contract was produced in Korea. Had Supreme been given the opportunity to bid on the project it would have submitted a competitive bid.

### **4. Fort Hills Utilities and Offsite**

37. Fort Hills Project is an open-pit oil sands mine development owned by Suncor. It is estimated that the lifespan of the project will be 50 years and that it will produce 180,000 barrels of bitumen per day at full production. The project includes several phases that require FISC.
38. One portion of the project is the Utilities and Offsite component (“U&O”). This portion of the project provides the power, energy and steam to the remainder of the project. As oil sands mining and bitumen extraction is very energy intensive, this portion of the project is significant. Fluor Engineering is the EPC for the U&O project, whose contract value is estimated to be \$1.3 billion.<sup>4</sup>
39. Supreme was very interested in this project. Prior to the RFQ being issued Supreme worked with Fluor by reviewing their models and providing constructability input on their plans. Supreme received an RFQ for this portion of the project in March 2014 and

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<sup>3</sup> Public Attachment 3: Oil Sands Magazine, “The curse of Fort Hills is finally lifted” (April 4, 2016).

<sup>4</sup> Public Attachment 3: Oil Sands Magazine, “The curse of Fort Hills is finally lifted” (April 4, 2016).

PUBLIC  
Statement of Evidence of  
Paul Zubick

Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016

the following month Supreme submitted its bid. In May 2014, we received several technical clarifications from Fluor and then we never heard from them again.

40. Supreme learned through industry sources, and it is generally and publically known, that the project was awarded to Baosteel, a state-owned firm in China.
41. Supreme has been previously advised by Fluor that it can source FISC from China for [ ]% less than it costs to source material from Canada.
42. Supreme bid \$[ ] to supply [ ] MT of FISC for this project, or \$[ ]/MT. Based on Supreme's market intelligence that Chinese prices are [ ]% less than domestic prices, I estimate that the Chinese price, delivered, were at no more than \$[ ] or \$[ ]/MT.

#### **5. Fort Hills Cogeneration Power Plant**

43. The EPC contract for the Fort Hills Cogeneration Plant (power plant) was awarded to TR Canada, the Canadian subsidiary of Spanish engineering firm Tecnicas Reunidas ("TR Canada"). The turnkey contract includes engineering, procurement and construction of two 85 MW gas turbines, two heat recovery steam generators (HRSGs) and all related interconnecting systems. The contract is reported to be valued at \$250 million.<sup>5</sup> I am not aware of the source of the FISC for this project, but word of mouth in the local industry is that it was produced in South Korea.

#### **6. Sturgeon Refinery - Hydrotreaters**

44. The North West Redwater Partnership ("NRWP") is the owner of the Sturgeon Refinery project in Alberta. The refinery will process oil sands bitumen into diesel, diluent and other products, such as ethane, propane and butane. Construction of Phase 1 of the project is expected to run from mid-2013 through to the end of 2016.

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<sup>5</sup> Public Attachment 3: Oil Sands Magazine, "The curse of Fort Hills is finally lifted" (April 4, 2016).

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

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45. Public Attachment 4 is a map that shows the bus route around the site. It illustrates the complexity and size of this project, and similar projects, like Fort Hills.<sup>6</sup>
46. One part of the project is the construction of Hydrotreaters. Hydrotreating is a process that uses hydrogen to treat and stabilize the crude oil that is synthesized from bitumen. The EPC for this portion of the project is the German firm Lurgi.
47. Lurgi did not seek quotes or bids from Supreme or other domestic producers to supply the FISC for the Hydrotreater structures. Rather, it sourced the FISC from offshore. I was advised by [ ] that the FISC were supplied by United Steel Structures Ltd (USSL) headquartered in Guangzhou, China. I am not aware of the volume or value of the FISC that was supplied for the Hydrotreaters. Based on my general knowledge of the project and the industry, I estimate that the project would require 2,500 MT of FISC. I also estimate that the FISC for this project will be delivered between the first quarter of 2015 and the second quarter of 2016.
48. Based on my knowledge of the industry and the particulars of this project, I estimate that domestic producers would have priced the project at approximately \$4,376/MT. With an estimated volume of 2500 MT, the value of this project is \$10,940,000. Based on our market intelligence of the cost to produce and delivery FISC to an Alberta jobsite, the value of the FISC from USSL is approximately \$7,658,000.

**7. LaFarge Baghouse**

49. LaFarge is a producer of construction materials, including cement.
50. As part of LaFarge's expansion and upgrade of its plant in Exshaw, Alberta, the firm commissioned the construction of a "baghouse" to collect particulates from its new kiln. The project also included a larger structural building, for which Supreme Group did not

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<sup>6</sup> Public Attachment 4: Sturgeon Refinery, Alberta, site bus route map.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

receive a request for quotation, but our understanding is that the FISC for that structure was produced by a Chinese producer.

51. The baghouse portion of the project required [ ] MT of FISC. In 2014, Supreme Group submitted a bid for \$[ ] or \$[ ]/MT.<sup>7</sup> Supreme Group was not awarded the project. Instead, it was awarded to an unknown Chinese FISC producer at an unknown price. I estimate that the FISC for this project would have arrived between 2014 and early 2016.

**B. South Korea**

52. Attachment 6 to this statement is [ ]
- ].

53. The document [ ]
- ].

54. This commercial intelligence puts Korean prices, ex-works, at [ ]% and [ ]% below North American prices. I believe that this level of price undercutting is consistent across projects.

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<sup>7</sup> Confidential Attachment 5: Letter from Supreme Group LP to LaFarge Canada Inc., dated July 11, 2014.

<sup>8</sup> Confidential Attachment 6 : [ ]



**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

**1. NRWP Sturgeon Refinery Units 50-60**

55. TR Canada was awarded the EPC contract for the Light Ends Recovery Unit (Unit 50) and the Sulphur plant (Unit 60) of the NRWP project in 2014. TR Canada is a subsidiary of Tecnicas Reunidas Group, a Spanish firm.
56. Supreme was asked to provide a quote on this project. Our initial quote for supply only was approximately \$[ ]/MT for [ ]MT, excluding steel grating.<sup>9</sup> The scope of the project changed somewhat over time, with a smaller volume of FISC initially prescribed. In the end, I believe that approximately [ ] MT of FISC was procured. Had Supreme acquired this project it would have resulted in approximately \$[ ], assuming its original quote applied to the revised scope.
57. I have been advised by a colleague at [ ] that the FISC was sourced from Hanmaek Heavy Industries in Korea. I do not know the price of the FISC however, based on [ ] I assume that the price was [ ] below our price.
58. Based on my knowledge of the project, I estimate that the FISC would have been delivered between the second-half of 2014 through 2015 time period.
59. Supreme has prepared a dumping example for this project based on the [ ]MT we originally quoted. Using Supreme's costs, adjusted for Korean labour, financial expense, profit and SG&A, we estimate that the Korean fully absorbed cost of production plus reasonable profit was \$[ ] and its selling price was [ ]% below Supreme's price, or \$[ ], resulting the Korean product's sale price being [ ]% lower than its reasonable production cost plus profit.
60. FISC is generally shipped in 40 foot containers, with approximately 15-20 MT per container. We received a quote from [ ] to ship FISC from

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<sup>9</sup> Confidential Attachment 7: [ ]

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**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

[ ] to Edmonton, Alberta in May 2016 at a price of \$5,298 per 40 foot container.<sup>10</sup> Assuming that there is 17.5 MT of FISC per container, the shipping cost is approximately \$303/MT.

61. Applying the cost of \$303/MT freight, which equals \$[ ] the fairly traded price of Korean goods would have been \$[ ].
62. By comparison, Supreme's price was \$[ ]. Nevertheless, I believe that but for the unfair pricing by the Korean supplier, Supreme would have acquired the project. First, EPCs and owners will only consider offshore material if there is a discount in the range of 10% to 20%, depending on the circumstances. The reason for the discount is that there are associated risks with purchasing offshore. These include delivery issues, modification and repair issues (e.g. if an offshore component does not fit it must be sent back, re-ordered, or modified by a domestic firm), currency risks, lines of credit, coordination between erection company and supplier, and customer service. These risks are lessened when FISC is supplied domestically and the fabricator is relatively close.
63. Further, Supreme would have been willing to lower its price by [ ] to acquire this work, [ ]  
[ ]. In my experience, when we are close to pricing, EPCs will ask us to lower our price in order to acquire the project. Consequently, I believe that had the project not been dumped by 19.5%, Supreme would have been competitively considered as a supplier for this project

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<sup>10</sup> Confidential Attachment 8: [ ]. Note:  
US\$4,200 was converted at an exchange rate of 1.2614, the Bank of Canada exchange rate on April 26, 2016.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

**C. Spain**

**1. CNRL – Horizon Upgrader (U31A, U31, and U32)**

64. Canada Natural Resource Limited (CNRL) is a crude oil and gas producer. CNRL hired TR Canada as the EPC on an update to Upgrader for the Horizon Oil Sands mine. The project is described on TR Canada's website as:

Upgrader update including a new Diluent Recovery Unit, a new Vacuum Distillation Unit and a new H2S stripping unit. The project will support the objective of CNRL of producing 250 KBPSD of SCO (Synthetic Crude Oil) from the mine of Horizon, where the bitumen is extracted.<sup>11</sup>

These three units are referred to as U31A, U31 and U32.

65. In 2012, TR Canada issued an RFQ for the three. Supreme submitted a bid in September 2012.<sup>12</sup> In October 2012, as per TR Canada's request, Supreme re-submitted its bid in a revised format that broke out pricing for areas 31, 31A and 32.<sup>13</sup> In October 2012 there were also communications between Supreme and TR Canada clarifying certain aspects of Supreme's bid.
66. In January 2013, Supreme was advised that it was not awarded the project.
67. The table below sets out the elements of Supreme's bid. The RFQ included steel grating, which Supreme does not produce, but would have supplied as part of the package. As per the RFQ instructions, the bid did not include a quote for the price of connections (i.e. welding and fastener connections). Nonetheless, connections are necessary and would have formed part of the actual price. As such, Supreme has prepared a second column which shows Supreme's bid excluding grating but including connections. The table

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<sup>11</sup> Public Attachment 9: TR Canada, Projects in Canada, "DRU-VDU-HSU Project", <http://www.trcanada.ca/en/druvduhsu-project.html?canada=1&idTipo=0&csrfToken=BB0BAB37234088CDA8779AB03536A09D>.

<sup>12</sup> Confidential Attachment 10: [ ].

<sup>13</sup> Confidential Attachment 11: [ ].

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

below lists the volume off with estimated connection weight but excluding grating.  
“Value” lists Supreme’s actual bid value.

Area	MT	Value	Value (with connections and without grating)
31A	[		
31			
32			
<b>Total</b>			<b>]</b>

68. TR Canada’s website states that the project duration is May 2012-May 2016. Based on Supreme’s knowledge of the market, the FISC for this project would have been imported between the second-quarter of 2013 and the third-quarter of 2014.
69. At the time this project was awarded I was a vice-president at Waiward Steel, one of the other complainants. At that time, I was advised [

]. It is inconceivable to me that a FISC producer could produce FISC at such a price except at a significant loss.

70. Supreme Group has prepared a dumping calculation for this project. The example uses the “Value with connections and without grating” price as this is the best reflection of the actual value of the FISC and excludes goods that are outside scope of the FISC product definition. For the ex-works selling price, we have used Supreme’s bid price minus [ ]%. I do not know that Supreme was the lowest Canadian bidder on this project, meaning this ex-works selling price may be higher than the actual ex-works selling.

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

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Further, I do not know if the Spanish price cited above included delivery; however, given that Supreme's bid did not, it is assumed that the Spanish price was ex-works Spain. Thus, the Spanish selling price is conservative and most likely higher than the actual selling price price.

71. Based on our dumping margin calculation, we estimate that the Spanish FISC was dumped by a margin of [ ]%.
72. As discussed above, FISC is generally shipped in 40 foot containers with approximately 15-20 MT per container. Supreme received a quote to ship FISC in 40 foot containers from Madrid, Spain to Acheson, Alberta. The quote was for \$10,595 per 40 foot container, exclusive of duty, tax, insurance and custom clearance costs.<sup>14</sup> As such, the shipping cost is conservative. Assuming an average of 17.5 MT per container, the shipping cost was \$605/MT. Consequently, the fully absorbed delivered cost of the Spanish FISC would be \$[ ].
73. Despite the estimated Spanish fully absorbed cost of production plus reasonable profit, plus shipping, being below Supreme's price, I believe that but-for the dumping by the Spanish supplier, Supreme was competitive for the project and could have obtained the order. First, as mentioned above, EPCs and owners will only consider offshore material if there is a discount in the range 10% to 20%. The reason for the discount was discussed above.
74. Second, Supreme would have been willing to lower its price by [ ] to acquire this work, [ ]. In my experience, when we are close to pricing, EPCs will ask us to lower our price in order to acquire the project. Consequently, I believe that had the project not been dumped by 153%, Supreme would have been competitively considered as a supplier for this project.

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<sup>14</sup> Confidential Attachment 12: [ ]. Canadian rate based on US\$8,025 and an exchange rate of 1.3203, which was the Bank of Canada US exchange rate for March 23, 2016.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

**2. Laricina – Saleski Project**

75. Laricina Energy Ltd. is an energy company operating in Alberta's oil sands. Its Saleski project is a bitumen extraction development in the Athabasca region of Alberta.
76. TR Canada was selected as the EPC on the Saleski development. In January 2014 a representative of TR Canada sent Supreme an RFQ package. At that time, information about the project was incomplete. That same month, Supreme provided TR Canada with budgetary pricing on the project. Excluding grating, the pricing was \$[ ] for [ ] metric tons of FISC.<sup>15</sup> In February TR Canada sought some clarifications and then was silent until late 2014.
77. December 2014, TR Canada contacted Supreme with a reduced scope on the project and more information. Supreme submitted revised pricing that some month, totaling \$[ ] for [ ] metric tons, which is exclusive of grating.
78. Supreme never heard from TR Canada again about this project. I believe that this project was awarded to an overseas supplier. I know that TR Canada has previously sourced FISC from Spain and it is possible that this project was also sourced from Spain.
79. Based on my knowledge of the project and scope and size of the order, I believe that this order would have been delivered in the first half of 2015.

**D. Other Projects**

80. In addition to those projects named above, additional projects that Supreme would have bid on to supply FISC if given the opportunity, but it was not and the FISC was procured from China, Korea, Spain, the UK or the UAE, include:

a) *Fort Hills Extraction Facility (Modules)*

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<sup>15</sup> Confidential Attachment 13: Letter from Supreme Steel LP to Técnicas Reunidas Group, dated January 31, 2014.

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

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- b) *Canadian Natural Resource Limited (CNRL) – Horizon Oil Sands – Delayed Coking Unit* (EPC: Tecnip Italy)
- c) *Syncrude – Mildred Lake Mine Replacement – Slurry Buildings; Surge Bins* (EPC: Krupp)
- d) *Suncor – Fort Hills – Ore Preparation Plant* (EPC: FAM)
- e) *CNRL – Coker Tower* (EPC: Tecnip Italy)
- f) *CNRL – 4/5 Slurry Preparation Plants* (EPC: Krupp)
- g) *CNRL – 4/5 Ore Preparation Plant* (EPC: FAM)
- h) *Vale – Long Harbour Processing Plant* (EPC: Fluor Canada)
- i) *Husky -- Sunrise SAGD*
- j) *Brion Energy – SAGD Modules*

**IV. Effect on Supreme Group**

81. The loss of Canadian industrial projects to FISC imports had a significant negative impact on the Supreme Group.

**A. Lost Opportunities**

82. As discussed above, Supreme has lost the opportunity to bid on a number of major projects. While Supreme would not have expected to acquire all of these projects, it would have expected to acquire a few. Even if Supreme had acquired 20% to 30% of the projects that have gone overseas it would be in a much better position than it is now.
83. The reason that Supreme is losing opportunities to bid is the price of imported FISC. Over the last two years, Supreme is consistently and repeatedly told by EPCs that they can acquire FISC overseas for 25% to 30% less than it costs to source FISC fabricated in

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

Canada. This is evidenced by the [ ] discussed above. I understand that this price difference includes delivery costs.

84. [ ]  
[ ]

**B. Price Depression**

85. Until recently, we bid projects with a [ ]% to [ ]% profit margin. Such a margin is a necessary and reasonable return given the nature of the FISC business. A firm price is often quoted to customers based on units of steel prior to the structural design being completed. Our bid is prepared carefully, based on the RFQ details and our extensive experience and knowledge. However, there are always unknowns and a margin of 10% to 15% provides a cushion for the risk of extra costs associated with unforeseen technical design issues or additional fabrication labour that may not be recoverable through the change management process.

86. Today, we are bidding with a [ ]% to [ ]% margin. For example, we recently bid on [ ] with a profit margin of [ ]% because it was made clear to Supreme that it would be bidding against offshore FISC producers. We are doing this in an effort to keep our prices as low as possible in order to compete with imports. However, there is risk associated with such tight margins. Further, as discussed below, this has contributed to Supreme [ ] in 2014 and [ ] in 2015 on its FISC production business.

**C. Production and income**

87. The FISC industry was very good from 2005 to 2013. Oil and commodity prices were rising and there was a lot of development in the potash mining sector and the oil sector. From 2008 through 2013 Supreme invested to expand its production facilities. Between



**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

2008 and 2013, Supreme's annual production capacity had expanded from [ ] MT to [ ] MT.

88. In 2013, Supreme was still producing for orders it acquired in 2011 and 2012. On an estimated calendar year basis, it produced [ ] MT of FISC and [ ] MT of fabricated structural steel components for non-like goods (commercial applications, bridges, etc...).<sup>16</sup> Supreme's production capacity utilization for FISC was [ ]% and its total capacity utilization was [ ]%. At this point, Supreme's production was already impacted by imports outside the period of investigation, including FISC used for Rio Tinto Alcan's expansion in 2011-2012 and some oil sands projects. Further, the volume of work was less than that in the 2005-2012 period. That said, Supreme remained profitable.
89. In calendar year 2013, Supreme had a net profit on FISC production of \$[ ], which was equal to approximately [ ]% of revenue.
90. In calendar year 2014, Supreme's FISC production fell by [ ]% year-on-year to [ ] MT, resulting in FISC only occupying [ ]% of Supreme's production capacity. This was largely attributable to the loss of orders to dumped and subsidized imports as the dropping price of oil was not yet reflected in our order book. Its net profit dropped by [ ]% to \$[ ].
91. Supreme took several steps to respond to its downturn in FISC production. Supreme sought out and acquired steel component fabrication orders for non-like goods, such as commercial structures and bridges. Its work in this area jumped by from [ ] MT in calendar year 2013 to [ ] MT in 2014. From our fiscal year-end in June 2013 through fiscal year end in June 2014, non-FISC production jump from [ ] to [ ]. This non-FISC work sustained Supreme in 2014; however, it was not ideal. Like-goods FISC

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<sup>16</sup> Note: Supreme tracks its financial data on a fiscal basis with year-end in June. For the purposes of the complaint, unless stated otherwise, the comments about Supreme's financials are on a calendar year basis. These figures are estimates based on our fiscal reporting.

**PUBLIC  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

---

is Supreme's core market and the heart of its business and its 2014 production for the commercial and bridges market was a defensive strategy.

92. Supreme also cut costs. Supreme's general, sales and administrative costs for FISC dropped significantly year-on-year in 2014 in part due to Supreme cutting costs. Supreme also shifted some of these costs to its non-like goods production.

93. In calendar year 2015, Supreme's FISC production of FISC like-goods dropped further to [ ] MT, resulting in a FISC production capacity utilization rate of [ ]%. Its non-like goods production also dropped. The FISC work that Supreme completed in 2014 and 2015 was bid with much tighter margins than it had bid in the past. In 2013, Supreme's net income on FISC was [ ]% of revenue. This fell to [ ]% in 2014 and [ ]% in 2015.

94. Dumped and subsidized goods are a major cause of this injury. Production in 2014 and 2015 was largely for orders that preceded the price oil falling below US\$100 a barrel in the second half of 2014. While the market was slowing at this time, the FISC market was still healthy. The main issue, however, was that we were no longer being considered as a supplier because EPCs could source FISC from overseas at extremely low prices.

**D. Production and financials—2016 and 2017**

95. The near future for Supreme's FISC business is not good. Two or three years ago Supreme would have FISC orders booked at least 12 to 18 months in advance. This was due to the nature of the FISC industry, in particular construction and erection schedules. [ ]  
[ ].

96. In order to mitigate this we are looking for non-FISC orders, such as structural steel fabricated for commercial structures and bridges. That said, Supreme's core business has fallen out from underneath it and there will be repercussions.

97. In 2015, Supreme had approximately [ ] employees who worked on FISC supply, which has already dropped to [ ]. Unless there is a sudden upswing in FISC orders or

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

non-like good structural steel orders, which is not expected, [  
].

98. Further, unless Supreme can obtain FISC orders its financial results will deteriorate over 2016 and into 2017.

**E. Market – 2016 and 2017**

99. The market for FISC will not be as strong in 2016 and 2017 as it was in 2015. I estimate that Canadian FISC demand in each of 2016 and 2017 will be approximately 40% below what it was in 2015; however, the market will remain. There will continue to be some work in the oil sands sector, albeit less than there was previously. It is expected that a couple of petrochemical facilities will be commissioned in this period. The development of liquid natural gas facilities is possible in British Columbia. Further, some pot ash expansion is continuing in Saskatchewan. In all cases, for projects that are on our list as likely to proceed, almost all are being considered for international procurement by the owners, and or EPC companies involved. Given the fact that the market size is expected to shrink substantially in the next 18 months, the FSS for work that is available is at great risk of being procured internationally.
100. Supreme has the capacity and expertise to supply the FISC required for such projects. However, if the pattern of utilizing dumped and subsidized foreign produced FISC continues, there is a real possibility that Supreme will not have the opportunity to bid on these projects, let alone actually acquire the order.

**V. Conclusion**

101. Supreme has been injured by unfairly priced FISC from China, Korea, Spain, the UK and the UAE. Low priced imports from these offshore sources have under Supreme's prices and resulted in price depression. Supreme has lost the opportunity to bid on many projects that, two or three years earlier, it would not only have been asked to bid on but would have had a very high probability of acquiring. As a result, Supreme has been

**PUBLIC**  
**Statement of Evidence of**  
**Paul Zubick**

**Complaint**  
**Certain Fabricated Industrial Steel Components**  
**July 22, 2016**

---

forced to seek opportunities to produce goods other than FISC and has seen its capacity utilization, production, gross margin and net income contract over the last three years. While some of this contraction is attributable to changes in the western market for FISC, the major factor contributing to Supreme's injury over the last three years is attributable to unfairly priced imports.

I, Paul Zubick, Chief Operations Officer at Supreme Group LP, certify that the information in the Witness Statement is true, accurate and complete.



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**Paul Zubick**

**Public  
Statement of Evidence of  
Paul Zubick**

**Complaint  
Certain Fabricated Industrial Steel Components  
July 22, 2016**

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**List of Attachments**

<b>Tab #</b>	<b>Description</b>
1	Confidential Attachment: [ ].
2	Production Cost Adjustment Analysis
3	Oil Sands Magazine, “The curse of Fort Hills is finally lifted” (April 4, 2016)
4	Sturgeon Refinery, Alberta, site bus route map
5	Confidential Attachment: Letter from Supreme Group LP to LaFarge Canada Inc., dated July 11, 2014.
6	Confidential Attachment: [ ].
7	Confidential Attachment: [ ].
8	Confidential Attachment: [ ].
9	TR Canada, Projects in Canada, “DRU-VDU-HSU Project”
10	Confidential Attachment: [ ]
11	Confidential Attachment: [ ]
12	Confidential Attachment: [ ]
13	Confidential Attachment: Letter from Supreme Steel LP to Técnicas Reunidas Group, dated January 31, 2014.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 1**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 1** contains a cost study which is subject to copyright restriction.

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**COMPLAINT**

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 Summary of  
Confidential Attachment 2**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 2** contains confidential business information, the disclosure of which would cause harm to the business and commercial interests of Supreme Group LP.

**Statement of Evidence of  
Paul Zubick**

**Attachment 3**

The Fort Hills Oil Sands Mine finally gets off the ground | Oil Sands Magazine

**Public**

2016-05-17, 9:11 AM

**OIL SANDS MAGAZINE (/)**

## **THE CURSE OF FORT HILLS IS FINALLY LIFTED (/SUNCOR-AWARDS- CONTRACTS-FORT-HILLS- OIL-SANDS-MINING- PROJECT)**

PROJECTS (/OILSANDS-NEWS-ARTICLES/?CATEGORY=PROJECTS) ·  
APR 4, 2016

After several false starts, Suncor Energy finally manages to get the Fort Hills Oil Sands Mine off the ground. Although Suncor has only been working on the project for the past 7 years, Fort Hills has actually been in the works for almost a century. And keeping the \$13.5 billion mega-mine on budget and on-schedule is nothing short of a global effort.



After several failed attempts, corporate takeovers and dissolved partnerships, Fort Hills is finally starting to take shape. In their 2015 annual report ([http://www.suncor.com/pdf/2015\\_Annual\\_Report\\_EN\\_FINAL.pdf](http://www.suncor.com/pdf/2015_Annual_Report_EN_FINAL.pdf)), Suncor declared the project's construction is finally over the hump, having achieved the 50% completion milestone. And the project's engineering is pretty much all wrapped up. By all accounts, there's no turning back now. Fort Hills is going forward and is well on its way to a late 2017 start-up.

Although Suncor has only been working on the project for the past 7 years, the Fort Hills lease has actually been under development for almost a century. In many ways, the project has been around the block several times and seems to have jinxed the many companies that have crossed its path.

**HOW HISTORY REPEATS ITSELF**





**Statement of Evidence of**

**Paul Zubick**

**Attachment 3**

The Fort Hills Oil Sands Mine finally gets off the ground | Oil Sands Magazine

**Public**

2016-05-17, 9:11 AM

Alberta's very first oil sands extraction plant was located on the Fort Hills lease. Dr. Karl Clark, inventor of the Clark Hot Water Process that separates bitumen from the oil sands, helped develop Bitumount



(<http://www.history.alberta.ca/energyheritage/bitumount/Default.aspx>), Alberta's first "commercial" oil sands plant built along the banks of the Athabasca River with the help of PEI entrepreneur R.C. Fitzsimmons in the late 1920s.

Luckily, the oil sands deposit at Bitumount is located very close to the surface, which made it possible to manually shovel the ore into the process plant. But it takes two tonnes of oil sands to make just one barrel of oil, making the process very labour-intensive. Due its remoteness and lack of amenities, the plant was plagued by chronic labour shortages.

Bitumount managed to produce 2,000 barrels of bitumen in 1931, displacing coal tar as roofing and road paving material (giving the oil sands its erroneous "tar" sands label). To help improve the product's marketability, Fitzsimmons built a very basic refinery onsite in the late 1930s. But the plant never reached its full potential and the company was later sold to Montreal-businessman Lloyd Champion in 1943. Bitumount never made a penny after that and was eventually taken over by the Alberta government. The site was abandoned in the late 1950s (<http://www.fortmcmurraytoday.com/2013/11/12/as-oilsands-expand-historic-bitumount-rots>) and declared a provincial heritage site in 1974.

Dr. Clark passed away less than a year before Suncor started up its base plant operation in 1967, finally proving the commercial viability of oil sands mining 40 years after the Bitumount experiment. But the ghost of Bitumount seems to have haunted the Fort Hills lease ever since. It would take another 70 years before Fort Hills would become a reality. The history of the project is a long and tortured one.

**FORT HILLS - A BRIEF HISTORY**

<b>1954</b>	<ul style="list-style-type: none"><li>• Can-Amera Oil Sands leased the Bitumount plant from the Government of Alberta for \$20,000.</li></ul>
<b>1955</b>	<ul style="list-style-type: none"><li>• Can-Amera buys Bitumount from the government for \$180,000 with the aim of commercializing Clark's hot water extraction process.</li></ul>
<b>1988</b>	<ul style="list-style-type: none"><li>• Can-Amera sells the Bitumount lease to US-based SOLV-Ex Corporation (<a href="http://www.otcmartets.com/edgar/GetFilingHtml?FilingID=930">http://www.otcmartets.com/edgar/GetFilingHtml?FilingID=930</a>) in exchange for royalty payments.</li><li>• SOLV-Ex originally planned to use solvent extraction to develop the lease, a technology it had successfully piloted with Shell Canada in the late 1980s. Shell abandoned the venture in 1988 but SOLV-Ex continued to evolve the technology, eventually claiming to develop a process that did not require solvents or tailings ponds. The technology was advertised as a huge improvement over Syncrude's and Suncor's existing operations.</li></ul>
<b>1994</b>	<ul style="list-style-type: none"><li>• United Tri-Star Resources (which later became UTS Energy) purchased a 10% interest in the Bitumount lease.</li></ul>
<b>1995</b>	<ul style="list-style-type: none"><li>• SOLV-Ex and UTS purchased adjacent leases from Petro-Canada. The combined properties were christened "Fort Hills" which at this point included Leases 5, 9 and 52.</li></ul>
<b>1997</b>	<ul style="list-style-type: none"><li>• TrueNorth Energy, a subsidiary of US-based Koch Industries, purchased 78% of Fort Hills (<a href="http://www.ualberta.ca/~apirg/atop-web/atop-prof_truenorth.htm">http://www.ualberta.ca/~apirg/atop-web/atop-prof_truenorth.htm</a>) after SOLV-Ex went into bankruptcy protection. UTS and TrueNorth planned to build a 95,000 bbl/day mining facility, feeding diluted bitumen into Koch's Pine Bend refinery in Minnesota. The Fort Hills plant had an anticipated start date of 2005.</li></ul>
<b>1998</b>	<ul style="list-style-type: none"><li>• The US Securities and Exchange Commission sued SOLV-Ex chairman John Rendall (<a href="http://www.canada.com/story_print.html?id=025d8f4d-876d-4873-be5a-87676391abe0&amp;sponsor=">http://www.canada.com/story_print.html?id=025d8f4d-876d-4873-be5a-87676391abe0&amp;sponsor=</a>) for lying to investors about the commercial viability of the SOLV-Ex oil sands process which cost shareholders \$825 million.</li><li>• Rendall insisted the allegations were false but died before he could clear his name.</li></ul>
<b>2001</b>	<ul style="list-style-type: none"><li>• UTS and TrueNorth file application for the Fort Hills mine with Alberta's energy regulator.</li></ul>

**Statement of Evidence of**

**Paul Zubick**

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**Public**

The Fort Hills Oil Sands Mine finally gets off the ground | Oil Sands Magazine

2016-05-17, 9:11 AM

<b>2002</b>	<ul style="list-style-type: none"> <li>Fort Hills receives regulatory approval (<a href="https://www.aer.ca/documents/decisions/2002/2002-089.pdf">https://www.aer.ca/documents/decisions/2002/2002-089.pdf</a>) to produce up to 235,000 bbl/day. The original facility licensed Syncrude's Low Energy Extraction (LEE) process, which was deemed less than successful at the time. Fort Hills originally included paraffinic froth treatment (PFT) technology, rejecting up to 10% of the heavy asphaltenes in the bitumen, producing a product that did not require upgrading. Cost estimate for the mine and plant was \$3.5 billion.</li> <li>Later that same year, UTS Energy delays the construction of Fort Hills and confirms the facility will not meet the 2005 start-date.</li> </ul>
<b>2003</b>	<ul style="list-style-type: none"> <li>Unable to find a partner with deep pockets, TrueNorth Energy shelves Fort Hills (<a href="http://www.theglobeandmail.com/report-on-business/truenorth-halts-oil-sands-project/article25684623/">http://www.theglobeandmail.com/report-on-business/truenorth-halts-oil-sands-project/article25684623/</a>) and partly blames the Kyoto Protocol.</li> </ul>
<b>2004</b>	<ul style="list-style-type: none"> <li>UTS Energy buys out TrueNorth (<a href="http://www.kochnews.com/CMSPages/GetFile.aspx?guid=c252400a-4400-461f-b8b9-1332f243c27a">http://www.kochnews.com/CMSPages/GetFile.aspx?guid=c252400a-4400-461f-b8b9-1332f243c27a</a>) for \$125 million in cash, giving UTS 100% ownership of the Fort Hills project.</li> </ul>
<b>2005</b>	<ul style="list-style-type: none"> <li>Petro-Canada purchases a 60% stake in Fort Hills from UTS and becomes the operator of the project.</li> <li>Later the same year, Teck Resources acquires a 20% stake in the project, 15% from UTS Energy and 5% from Petro-Canada. Teck brought mining experience to the team, which the other members did not have. The Fort Hills consortium then became 55% Petro-Canada, 30% UTS Energy and 15% Teck Resources.</li> </ul>
<b>2006</b>	<ul style="list-style-type: none"> <li>The Fort Hills partners change the process from paraffinic to naphthenic froth treatment, adding an upgrader in Sturgeon County (<a href="http://www.suncor.com/en/newsroom/5445.aspx?id=2304502">http://www.suncor.com/en/newsroom/5445.aspx?id=2304502</a>). Application for the mine was revised with a new mine plan, revised process and new design capacity. A new regulatory application was filed that same year for the Sturgeon Upgrader.</li> </ul>
<b>2007</b>	<ul style="list-style-type: none"> <li>The Fort Hills partners switch the froth treatment (<a href="http://www.annualreports.com/HostedData/AnnualReports/PDF/uts2007.pdf">http://www.annualreports.com/HostedData/AnnualReports/PDF/uts2007.pdf</a>) process back to paraffinic (from naphthenic). The move gave the partners the flexibility of selling diluted bitumen directly to market and defer construction of the upgrader.</li> <li>Investors begin to have doubts about the viability (<a href="http://www.canada.com/story_print.html?id=e752b7d9-b1de-48b6-973a-8d4ab55446b5&amp;sponsor=">http://www.canada.com/story_print.html?id=e752b7d9-b1de-48b6-973a-8d4ab55446b5&amp;sponsor=</a>) of the project given a severe labour shortage in Fort McMurray and rapid cost escalation. The mine and upgrader now had a \$15.4 billion price tag.</li> <li>The Alberta government gave the Fort Hills partners a drop-dead date of 2011 to build the facility or risk losing all its permits.</li> </ul>
<b>2008</b>	<ul style="list-style-type: none"> <li>Crude oil prices peak in the summer and begin plummeting fast during the second half of the year.</li> <li>UTS Energy acknowledges skyrocketing costs for Fort Hills, having risen more than 50% in less than a year. However, the consortium remained committed to the project (<a href="http://www.infomine.com/index/pr/Pa675442.PDF">http://www.infomine.com/index/pr/Pa675442.PDF</a>) and announce plans to review the FEED estimate and defer some capital expenditures. The partners would later announce the cancellation of the Sturgeon County (<a href="http://www.sherwoodparknews.com/2008/11/21/fort-hills-upgrader-joins-delayed-list">http://www.sherwoodparknews.com/2008/11/21/fort-hills-upgrader-joins-delayed-list</a>) upgrader.</li> <li>After purchasing a 3.3% stake in Petro-Canada (<a href="https://www.otpp.com/news/article/-/article/25054">https://www.otpp.com/news/article/-/article/25054</a>), the Ontario Teachers' Pension Plan put pressure on CEO Ron Brenneman to boost the share price. Brenneman responded by striking a deal with Suncor CEO Rick George to sell the entire company. The all stock deal was advertised as a merger of equals (<a href="http://www.cbc.ca/news/business/suncor-petro-canada-announce-merger-1.805258">http://www.cbc.ca/news/business/suncor-petro-canada-announce-merger-1.805258</a>), giving Petro-Canada shareholders a 25% premium on their share price.</li> <li>Fort Hills was shelved again as Suncor digested the huge acquisition. The company took a \$2.5 billion write down on the project, including the cancelled upgrader.</li> </ul>
<b>2010</b>	<ul style="list-style-type: none"> <li>After several hostile takeover attempts, UTS Energy agreed to be purchased (<a href="http://www.total-ep-canada.com/news/2010/documents/10-01-10-UTS-purchase-completion.pdf">http://www.total-ep-canada.com/news/2010/documents/10-01-10-UTS-purchase-completion.pdf</a>) by the Canadian arm of French energy giant Total for \$1.5 billion. The deal gave Total a 20% share of the Fort Hills project. The new start date was moved to 2016.</li> </ul>
<b>2013</b>	<ul style="list-style-type: none"> <li>Fort Hills was finally given the green light in October with a \$13.5 billion price tag (sans upgrader). That amount includes \$1.4 billion for contingency and cost escalation but excludes costs already sunk by Petro-Canada and partners before the project was shelved in 2008.</li> </ul>
<b>2015</b>	<ul style="list-style-type: none"> <li>Suncor purchased another 10% working interest in the project from Total E&amp;P Canada, reducing Total's share to 29.2% and boosting Suncor's stake to 50.8%.</li> </ul>

**A PROVEN PROCESS**

Fort Hills now has the distinct advantage of **not** being the first to produce marketable bitumen, following in the footsteps of Imperial Oil's Kearl process. The greenfield project consists of a mining (<http://www.oilsandsmagazine.com/oil-sands-surface-mining-open-pit-mining-techniques-overview>) facility, a bitumen production plant, a tailings storage area, utilities and all supporting infrastructure. The Secondary Extraction plant will employ a High-Temperature Paraffinic Froth Treatment (<http://www.oilsandsmagazine.com/oilsands-mining-solvent-paraffinic-froth-treatment-pft>) (HT-PFT) process, very similar to

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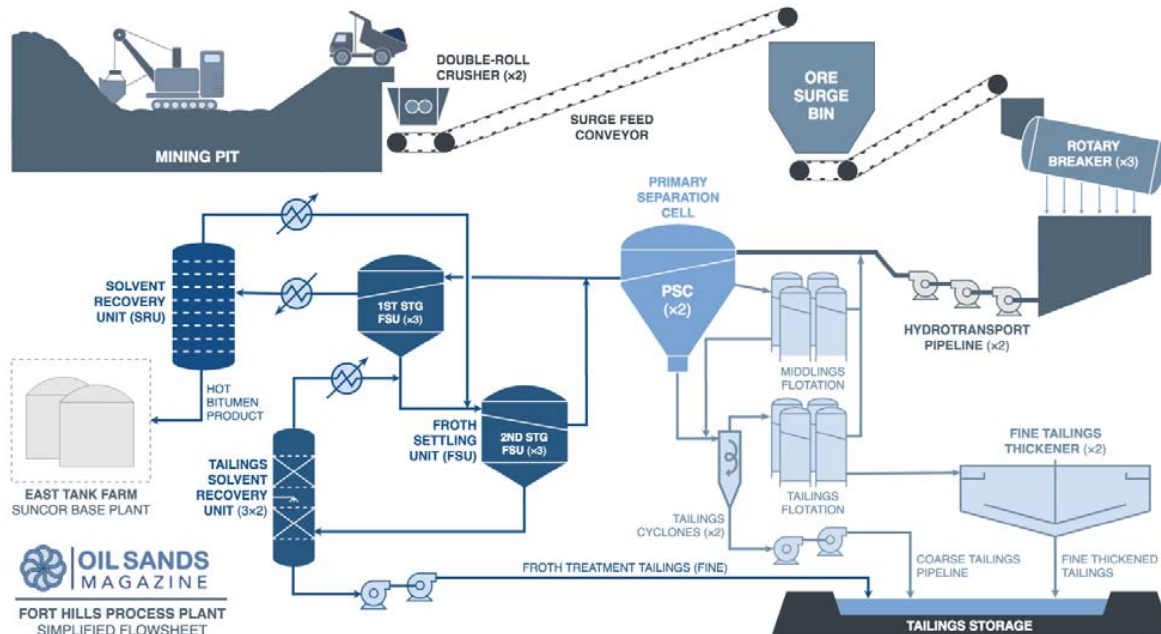
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2016-05-17, 9:11 AM

the one used by Imperial Oil and Shell. The Fort Hills deposit is relatively good grade with a slightly high strip ratio (<http://www.oilsandsmagazine.com/oilsands-mining-tv-bip-ratio-calculation>) (indicating a larger volume of overburden needs to be removed in order to access the bitumen-rich ore). Some sections of the mine contain ore grades in excess of 12% bitumen.



**AN INTERNATIONAL AFFAIR WITH CANADIAN CONNECTIONS**

Suncor followed the lead of Exxon/Imperial Oil and decided to fabricate most of the Fort Hills modules offshore, split between South Korea, India, China and the Phillippines. However, having learned from Kearn's very public struggles with oversized modules, Suncor is instead building smaller sections offshore, then reassembling the components like puzzle pieces closer to home before transporting the oversized loads to site. This minimizes the number of workers required at site and helps keep costs under control. Suncor expects the construction workforce to peak in the summer of 2016 at a maximum of 6,000 people, much lower than the 10,000+ workforce typically needed to build an oil sands mine.

Building the \$13.5 billion mega-mine is nothing short of a global effort. Suncor has tapped engineering and manufacturing resources from around the world, including many small and medium sized firms located in Alberta and across Canada.

**MINE & SITE DEVELOPMENT**

The contract for mine-site development was awarded to Canadian construction firm Aecon Group ([http://www.aecon.com/Media\\_Room/~1337-Aecon-awarded-mining-project-for-Fort-Hills-oil-sands-project](http://www.aecon.com/Media_Room/~1337-Aecon-awarded-mining-project-for-Fort-Hills-oil-sands-project)). The contract was reported to be worth \$123 million. Foundations and early works were awarded to Ledcor (<http://www.ledcor.com/our-projects/infrastructure/underground-utilities/fort-hills>), including the River Water intake structure along the Athabasca River and a 9 km piping corridor connecting to the Water Treatment and Waste Water Treatment plants. Kelowna-based Inline Construction Surveys (<http://www.inlinesurveys.ca/construction-surveys.php>) is the prime survey contractor for the site.





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**Public**

2016-05-17, 9:11 AM



**ORE PREPARATION, HYDROTRANSPORT & PRIMARY EXTRACTION**

Edmonton-based Bird Construction (<http://www.bird.ca/News-and-Media/news-115.html>) was awarded the contract for piling, foundations, earthworks, underground piping and electrical systems for Ore Preparation (/oil-sands-surface-mining-ore-preparation-opp-slurry-preparation-plant-spp) (OPP), Primary Extraction and Tailings facilities. Bird's contract was worth \$400 million.



The materials handling plant (the dry side of OPP) was awarded to Germany's FAM with much of the structural steel fabricated by Chinese firm BOA Steel. Fort Hills will have 2 double-roll crushers (<http://www.oilsandsmagazine.com/oil-sands-surface-mining-ore-preparation-opp-slurry-preparation-plant-spp#crusher>) feeding to a single Triple Surge Bin which feeds three independent trains of rotary breakers (<http://www.oilsandsmagazine.com/oil-sands-surface-mining-ore-preparation-opp-slurry-preparation-plant-spp#breaker>). The Surge Feed Conveyor will have 18 installed pulleys (<http://www.sigma.ms/english/News/index.html>), capable of transporting up to 14,500 tonnes/hr of mined oil sands to the process plant.



Edmonton-based Waiward Steel (<http://www.waiward.com/news/>) was awarded the contract to fabricate structural steel components for the OPP facility, including stair towers and HVAC modules stretching from the crushers to the slurry preparation feed conveyors.



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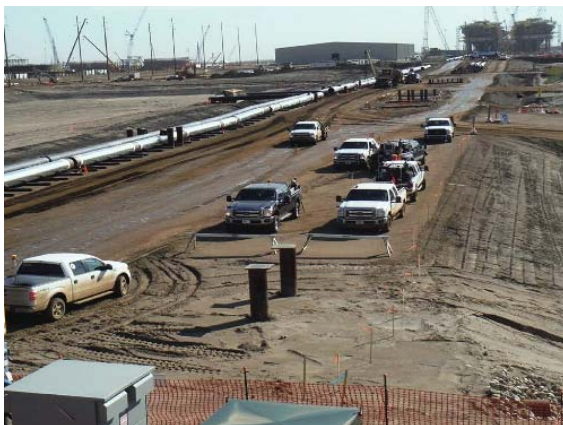
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2016-05-17, 9:11 AM

Pumpboxes for the Slurry Preparation Plant were fabricated by Saskarc Fabrication (<http://saskarc.com/steel-fabrication/custom-fabrication-solutions/>). The company's fabrication shop is located in the town of Oxbow in the SE corner of Saskatchewan near the US and Manitoba borders. Detailed engineering for the Slurry Preparation, Primary Extraction and the tailings facility was awarded to WorleyParsons (<http://www.worleyparsons.com/InvestorRelations/ASX/Pages/ContractawardfordetailedengineeringworkfortheFortHillsMineinCanada.aspx>) in a contract worth an estimated \$140 million.



Two large bore Hydrotransport (<http://www.oilsandsmagazine.com/hydrotransport-pipeline-oil-sands-mining-bitumen-production-facility>) pipelines will transport the oil sands slurry from the Ore Preparation Plant to the main bitumen extraction plant. Primary Extraction consists of 2 Primary Separation Cells (<http://www.oilsandsmagazine.com/oilsands-primary-extraction-gravity-separation-process-bitumen-production>) (PSC) and a series of column flotation cells to help recover bitumen from the middlings and tailings streams of the primary separation cells. Fort Hills will use thickeners to dewater fine tailings from the flotation circuits, recycling the water and waste heat back to the extraction plant.



**SECONDARY EXTRACTION (FROTH TREATMENT)**

One of the largest contracts was awarded to South Korean firm SK E&C ([http://www.koreatimes.net/english\\_hankook/999798](http://www.koreatimes.net/english_hankook/999798)) for engineering and construction of the Secondary Extraction facility (more commonly referred to as Froth Treatment (<http://www.oilsandsmagazine.com/bitumen-froth-treatment-process-overview-secondary-extraction-oilsands-bitumen-production>)). SK E&C reported the contract to be worth \$2.55 billion for both Detailed Engineering and construction of modules. The company had previously completed Front-End Engineering (<http://www.businesskorea.co.kr/english/news/industry/6039-overseas-contract-jackpot-sk-ec-solely-signs-26-trillion-won-canada-oil-sands>) (FEED) for Fort Hills in Seoul, South Korea. There are an estimated 600 modules in the entire Secondary Extraction facility.





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2016-05-17, 9:11 AM



Belgium-based Cofely Fabricom (<http://www.cofelyfabricom-gdfsuez.ca/EN/News/Pages/first-canadian-contract.aspx>) opened a 14 hectare assembly yard in Fort Saskatchewan (<http://edmontonjournal.com/storyline/a-company-gearing-up-to-build-80-modules-for-the-fort-hills-oilsands-project-is-being-swamped-with-job-applications>) to assemble 80 modules for SK E&C. In keeping with the project's modularization strategy, Fort Hills will consist of 3 Secondary Extraction trains with smaller vessels built offsite (versus the original plan of 2 larger trains which would have required the vessels to be stick-built onsite). Malaysia-based KNM Process Equipment ([http://www.knm-group.com/newsletters/Berita%20KNM\\_09\\_Mar2015.pdf](http://www.knm-group.com/newsletters/Berita%20KNM_09_Mar2015.pdf)) will be fabricating 6 Froth Settling Units (<http://www.oilsandsmagazine.com/oilsands-mining-solvent-paraffinic-froth-treatment-pft#FSU>) (FSU), each measuring about 10 meters in diameter and stand 30 meters tall. KNM is also fabricating 6 Tailings Solvent Recovery Units (<http://www.oilsandsmagazine.com/oilsands-mining-solvent-paraffinic-froth-treatment-pft#TSRU>) (TSRU), 6 drums, a froth deaerator, a process water heater and numerous other vessels for the process plant.



Sancon (<http://www.sanconltd.com/projects.php>) was awarded the contract to develop commissioning procedures for Secondary Extraction as well the Utilities & Offsite facilities.

**UTILITIES & INFRASTRUCTURE**

The utilities plant, which produces water and steam, was awarded to Fluor with about half of the engineering farmed out to their Indian office. Much of the large bore piping for the utilities plant is also being fabricated in India. Fluor's contract was reported to be worth (<http://www.canadianminingjournal.com/news/contract-fort-hills-oil-sands-contract-is-worth-1-3-billion/>) \$1.3 billion. Calgary-based Pacer Corporation ([http://www.pacercorp.com/Pacer\\_Chronicle\\_V2\\_2\\_Summer\\_2014.pdf](http://www.pacercorp.com/Pacer_Chronicle_V2_2_Summer_2014.pdf)) was awarded a \$15 million contract through Fluor for deep undergrounds, including firewater, potable and recycled water, storm sewers and sanitary systems.



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2016-05-17, 9:11 AM



Steam boilers were fabricated by US-based Cleaver-Brooks (<http://www.cleaverbrooks.com/Products-and-Solutions/Products-By-Application/Refineries---Petrochemical.aspx>). Cleaver-Brooks is a major supplier of modularized boilers for oil sands in-situ process plants. Heat exchangers are being manufactured by Chinese firm Jiangsu Sunpower Technology (<http://sunpower.en.made-in-china.com>). High pressure boiler feed water (BFW) pumps are being supplied by Flowserve (<http://www.flowserve.com>).

GIW subsidiary KSB (<https://www.ksb.com/ksb-ca-en/News/Press-Archive/2014-pressearchiv/press-release-may-2014-fort-hills-rdlo/29188>) was awarded the contract to supply 12 process water pumps, including 4 hot water supply pumps. The RDLO (<https://www.ksb.com/sec-en/Products/RDLO>) pumps range in capacity from 4,250 to 6,125 m<sup>3</sup>/hr.

Quebec-based H2O Innovation (<http://www.h2oinnovation.com/AfficherEvenement.aspx?id=388&langue=en>) was awarded a \$9.4 million contract to design, build, install, and commission a water treatment package, including potable water for the facility.

**CO-GENERATION POWER PLANT**

The COGEN plant was awarded to TR Canada (<http://www.tecnicasreunidas.es/recursos/noticias/tr-ri-fort-hills.pdf>), the Canadian arm of Spanish engineering firm Tecnicas Reunidas. The turnkey contract includes engineering, procurement and construction of two 85 MW gas turbines, two heat recovery steam generators (HRSGs) and all related interconnecting systems. The contract was reported to be valued at \$250 million. COGEN facilities produce steam and power simultaneously using natural gas, reducing the load on Alberta's power grid. This helps reduce greenhouse gas emissions from the mine since Alberta's power grid is still predominately coal-fired.

**PROCESS CONTROL & AUTOMATION**

Honeywell (<http://www.honeywell.com/newsroom/pressreleases/2014/06/honeywell-to-automate-oil-sands-project-in-canada>) was selected as the Main Automation Contractor for the project and will handle process control and simulation for the facility. A \$70 million telecommunications contract was awarded to UK-based Kentz Corporation (<http://www.kentz.com/media-centre/press-releases/kentz-awarded-further-scope-in-canada-for-the-fort-hills-oil-sands-project.aspx>), a subsidiary of SNC-Lavalin.

**ENVIRONMENT & WATER MANAGEMENT**

The McClelland Lake Wetlands Complex (<http://sustainability.suncor.com/2009/en/responsible/994.aspx>) (MLWC) which runs right through the Fort Hills mining area has been a major point of contention among environmental groups. Vancouver-based Hatfield Consultants (<http://www.hatfieldgroup.com/news/news-releases/hatfield-conducts-the-aquatics-monitoring-program-for-the-no-net-loss-lake-for-the-fort-hills-oil-sands-mine/>) was awarded the contract for aquatic monitoring of a new compensation lake for any fish, invertebrates and vegetation displaced by construction of the mine (referred to as the No Net Loss Lake). Hatfield will also be monitoring environmental compliance (<http://www.hatfieldgroup.com/news/news-releases/hatfield-to-monitor-environmental-compliance-during-construction-of-fort-hills-athabasca-river-water-intake/>) of the River Water Intake Structure and measuring water quality of various settling ponds (<http://www.hatfieldgroup.com/news/news-releases/hatfield-conducts-water-quality-monitoring-at-suncor-fort-hills-settling-ponds/>) located throughout the Fort Hills site. Settling ponds knock-out sediments in clean (non-process affected water) which is eventually released back to the environment.

**PIPELINES & STORAGE TANKS**

The Solvent Recovery Unit (<http://www.oilandsmagazine.com/oilands-mining-solvent-paraffinic-froth-treatment-pft#SRU>) (SRU) in Secondary Extraction produces a relatively high-temperature, partially-deasphalted bitumen. Since the bitumen is hot, it can be pumped to Suncor's base plant without the use of diluent. The new 24 inch 90 km pipeline (known as Northern Courier (<http://www.transcanada.com/northern-courier-pipeline-project.html>)) connecting Fort Hills and Suncor's East Tank Farm will be constructed and operated by TransCanada. Northern Courier also consists of a 12 inch diluent/diesel return line, providing fuel for the mining fleet and giving Fort Hills the ability to dilute the bitumen onsite if required.

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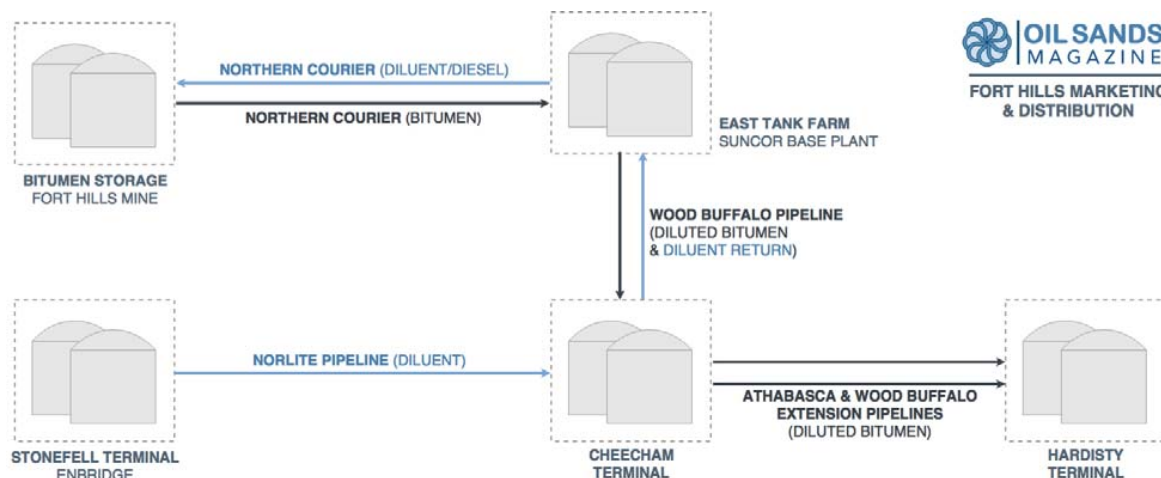
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2016-05-17, 9:11 AM

The Fort Hills partners are also building more storage capacity at Suncor's East Tank farm, where the hot bitumen will be blended with diluent pipelined from the Cheecham Terminal near Fort McMurray. A new 447 km Norlite Pipeline (<http://www.enbridge.com/projects-and-infrastructure/projects/norlite-pipeline-project>), constructed and operated by Enbridge, will supply Suncor with diluent from Enbridge's Stonefell Terminal near Edmonton.



Blended diluted bitumen (or dilbit) will be transported to the Hardisty Terminal via Enbridge's extended Wood Buffalo Pipeline. Teck Resources has secured 425,000 barrels of dedicated storage capacity at Hardisty, allowing the dilbit product to be refined locally in Edmonton, sold to market via existing pipelines or loaded onto rail cars. The new Fort Hills dilbit blend is expected to be similar in quality and price to Western Canadian Select (<http://www.oilsandsmagazine.com/western-canada-select-wcs-crude-oil-definition>).



**CAMP SUNCOR**

There are two camps operating on the Fort Hills site - the original Mount Robson Lodge (<http://sunlink.suncor.com/lodging/lodge/9/Mount-Robson-Lodge>) and the newly completed Mount Logan Lodge (<http://sunlink.suncor.com/lodging/lodge/12/Mount-Logan-Lodge>). Both camps were built by Edmonton-based Clark Builders (<http://www.clarkbuilders.com/projects/suncor-fort-hills-mount-robson-lodge/?sector=45>) with help from Fort McMurray's Heavy North (<http://www.heavynorth.com/suncor-fort-hills-mt-logan-lodge-project/>).





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2016-05-17, 9:11 AM



**THE FORT HILLS DIFFERENCE**

Fabricating piping modules and pressure vessels offshore is nothing new. The initial phase of Imperial's Kearl Oil Sands Mine was also criticized for building most of its modules in Asia. But Fort Hills is one of the first mega-projects to outsource most of its engineering to China, India and South Korea.

When Fort Hills was sanctioned in 2013, engineering offices in Calgary were bursting at the seams. Shell, Imperial and CNRL were in the midst of building and expanding their mining operations in Fort McMurray, making workforce shortages a top concern for Suncor investors. Fast forward just 2 years later and the picture became very different. After several oil sands operators wound down their major projects, engineering houses in Calgary began mass layoffs. And Fort Hills wasn't there to save them.



Suncor also faced a barrage of hate-mail last year when a HR recruiter told Fort McMurray locals not to bother applying for fly-in fly-out jobs at Fort Hills. Suncor later clarified the statement noting it would prefer to have Fort McMurray residents work at Suncor's base plant (located just 30 km north of the town) and not have commuter busses run 90 km up/down Highway 63 to the Fort Hills plant. However, Suncor later modified their hiring policy (<http://www.fortmcmurraytoday.com/2015/11/11/suncor-reverses-commuter-policy-for-fort-hills-will-consider-fort-mcmurray-hires>), allowing local residents to apply for positions at the remote Fort Hills operation. The mine is expected to employ 1,600 permanent staff, excluding maintenance contractors.

The Fort Hills partners insist they can keep operating costs, including sustaining capital to less than \$30 a barrel over the life of the mine. The project has an anticipated start date of late 2017, with ramp up to nameplate capacity within the first year of operation.

**FORT HILLS BY THE NUMBERS**

11.4% AVG BITUMEN GRADE	17.5% AVG FINES CONTENT	10.5:1 TV:BIP RATIO
42-50 YEARS MINE LIFE	14,500 TPH CRUSHER FEED	3.3B BBL 2P RESERVES
180,000 BBL/DAY CAPACITY	2017•Q4 EST. START-UP	1,600 PERMANENT STAFF

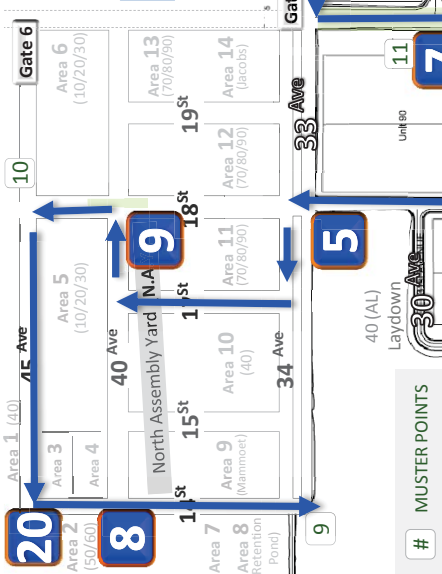
*The Fort Hills Energy LP's partners include Suncor Energy (50.8%), Total E&P Canada (29.2%) and Teck Resources Limited (20%). Suncor Energy is the developer and operator of the Fort Hills project through an operating services contract. All funds reported are in Canadian dollars. All photos courtesy Teck Resources unless otherwise stated.*

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Attachment 4

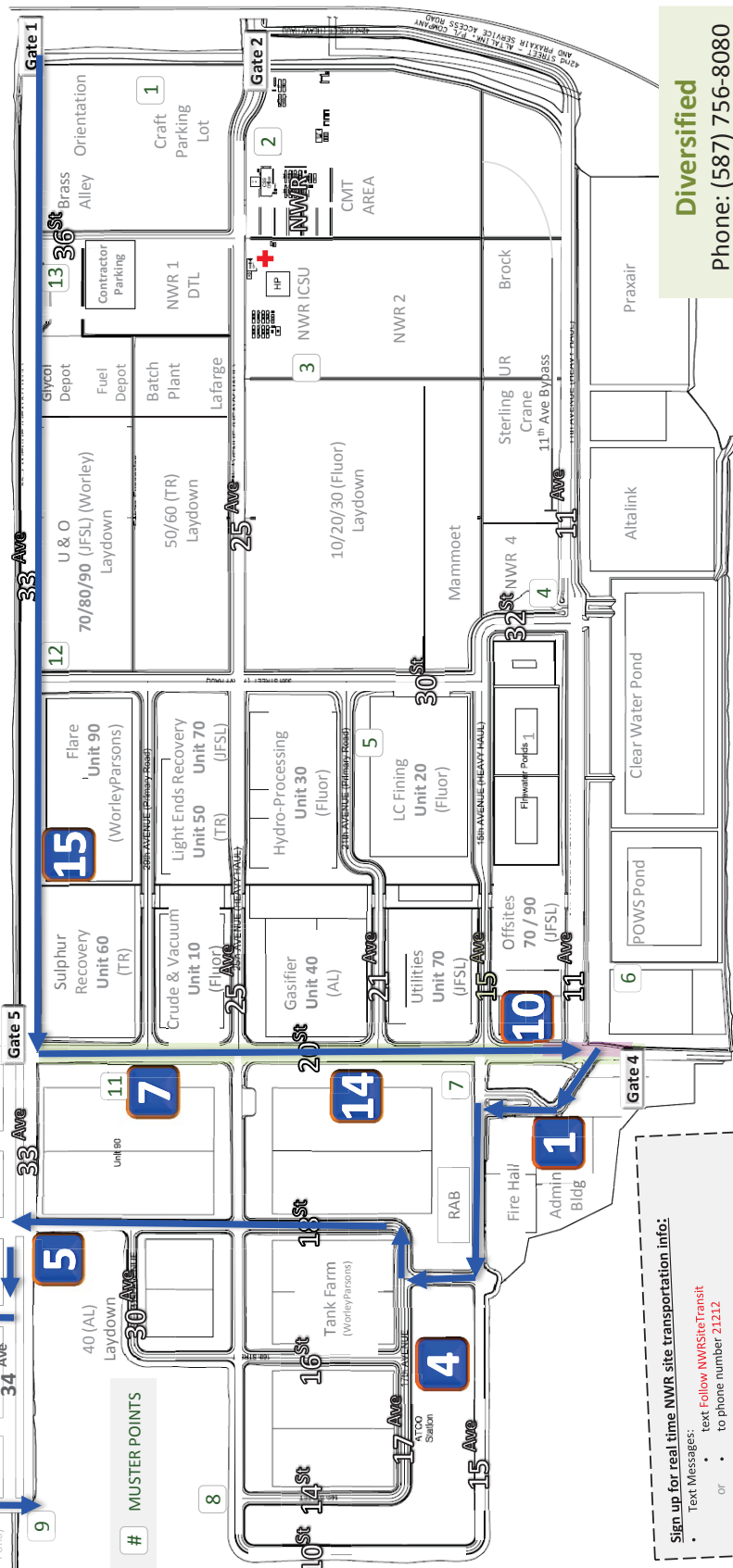
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[www.NWRsturgeonrefinery.com](http://www.NWRsturgeonrefinery.com)



Off-Site **WEST** AM Coach Bus Drop Off Map

Diversified Transportation Limited  
Effective: 2015-11-10 Rev 12



Sign up for real time NWR site transportation info:

- Text Messages:
  - text **Follow NWRSiteTransit** to phone number **21212**
- Twitter:
  - Create a Twitter account at [www.Twitter.com](http://www.Twitter.com)
  - Search [@NWRSiteTransit](https://twitter.com/NWRSiteTransit)
  - Click Follow

**Diversified**

Phone: (587) 756-8080

Contact for additional service on  
Night Shift & Weekends

Lost & Found: Security (Gate 2)

**West AM Off Site Coach Drop Off Sequence**

15 - 7 - 14 - 10 - 1 - 4 - 5 - 9 - 20 - 8

Please see Off-Site **EAST** AM Coach Drop Off Map  
for bus stops: 2, 3, 6, 11, 12, 13, 16, 17

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 5**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 5** contains confidential correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 6**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 6** contains confidential business information, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 7**

to Statement of Evidence of  
Paul Zubick  
Supreme Group LP

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**Confidential Attachment 7** contains confidential correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 8**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 8** contains a confidential quotation, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

Statement of Evidence of

Paul Zubick

Attachment 9

DRU-VDU-HSU Project - Técnicas Reunidas Canada

Public

2016-05-17, 10:37 AM

# Projects

Text to search....:

Type of project:

Search

## DRU-VDU-HSU Project

Client: CNRL

Location: Alberta (Canada)

Year: 2012

### Features:

**Project value:** -

**Duration:** May 2012 – May 2016

**Status:** Awarded

**TR Role:** EPC Contractor

**Type of contract:** EPC LSTK Contract



### Description:

Upgrader update including a new Diluent Recovery Unit, a new Vacuum Distillation Unit and a new H2S stripping unit. The project will support the objective of CNRL of producing 250 KBPSD of SCO (Synthetic Crude Oil) from the mine of Horizon, where the bitumen is extracted.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 10**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 10** contains confidential business correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.



**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 11**

to Statement of Evidence of  
Paul Zubick  
Supreme Group LP

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**Confidential Attachment 11** contains confidential correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 12**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 12** contains confidential business correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.

**COMPLAINT**

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

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**Public Summary of  
Confidential Attachment 13**

**to Statement of Evidence of  
Paul Zubick  
Supreme Group LP**

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**Confidential Attachment 13** contains confidential correspondence, the disclosure of which would be harmful to the business and commercial interests of Supreme Group LP.