

Environmental  
Resources  
Management

31 May 2013

State Department  
2201 C Street, NW  
Washington, DC 20520  
Attn: Keith Benes

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+1 847 258 8901 (fax)



Dear Mr. Benes:

ERM is considering a new assignment with the  
that would involve

We wanted to make the Department of State aware of the pending assignment with consistent with our ongoing obligation to avoid the perception of any conflicts with the Supplemental EIS work ERM is doing as Third Party Contractor for the U.S. Department of State with respect to the proposed Keystone XL Pipeline. Of course, if the Department perceives a conflict, ERM will not accept the assignment.

Attachment 1 is an excerpt from ERM's proposed scope of work that describes the effort ERM is considering. In brief, ERM will

. ERM's approach to this work involves using our extensive global network of offices to catalog local requirements using a standard matrix for each jurisdiction. A central ERM team of subject matter experts will then compile the results into a global ranking for delivery to .

**Key Facts for the Department to Consider in Reaching Its Determination**

1. The involves no assessment of the environmental impacts of any project.

. In its nature, objective, and scope, the is fundamentally

different than the work ERM is doing for the Keystone XL Supplement EIS project.

2. Because the work is so different than the Supplemental EIS effort, ERM could ensure there is no overlap of staff intended to work on and those working on the Keystone Pipeline effort. The effort is a compliance assurance project and relies upon our global network of oil and gas and regulatory subject matter experts to complete the effort. The Keystone Pipeline project relies upon our Senior Impact Assessment team to conduct environmental impact assessments which is a completely different skillset.
3. The report ERM is to prepare is being prepared solely by ERM. has no editorial rights whatsoever as is evidenced in the attached extract.
4. The Work ERM would do for is no different than many existing and ongoing projects that ERM has underway that involve the same type issues with respect to the oil and gas sector and greenhouse gas emissions throughout North America and globally. It is this experience that provides ERM with the necessary technical expertise to provide the level of informed and qualified assessment necessary as the independent Third Party Contractor to complete a thorough and defensible Supplemental EIS for the proposed Keystone XL project.

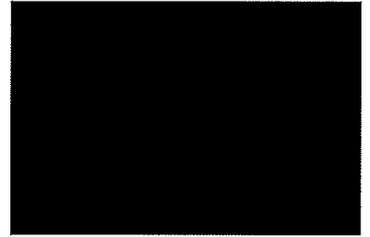
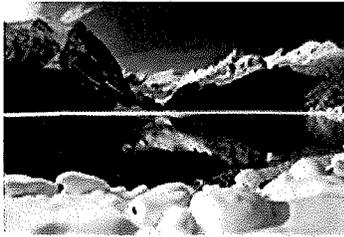
Sincerely,

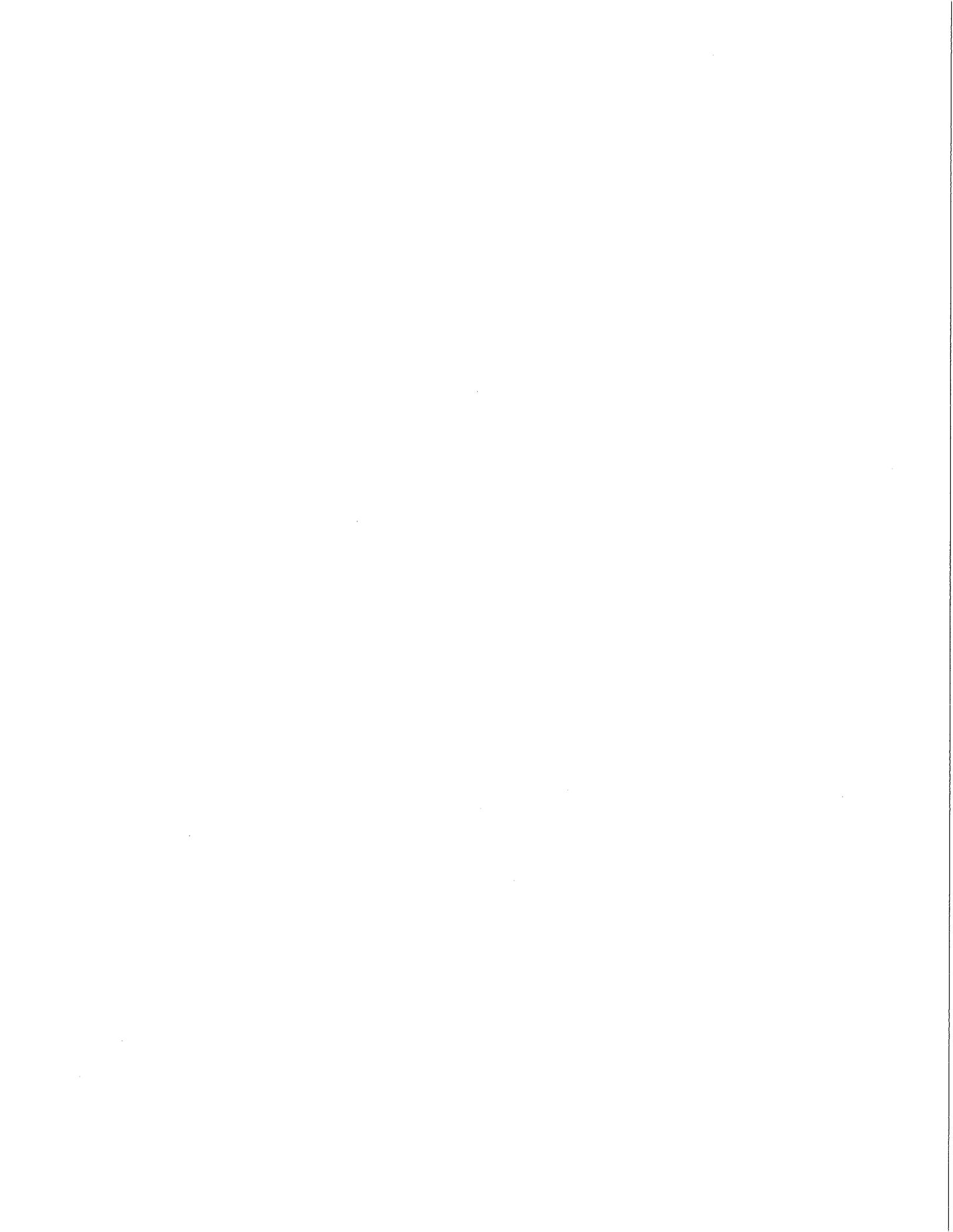


Michael O'Shaughnessy  
*Northern Division Managing Director*

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# 1. Introduction & Background





# 4. ERM's Approach

