

March 9, 2018

BY RESS & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited (“Union”)
2018 Bickford Storage Pool Project
Board File# EB-2017-0363**

The following are Union Gas Limited (“Union”) reply submissions for the 2018 Bickford Storage Pool Project EB-2017-0363. Submissions were received from OEB Board Staff, and The Ministry of Natural Resources and Forestry (“MNRF”). All submissions support Union’s Application. Union’s reply submissions address the issues and requests identified by the parties in the application.

OEB Board Staff

In Board Staff submission dated March 5, 2018, they support Union’s application, subject to the proposed draft conditions for the well licences and the proposed pipelines for which leave to construct approval has been requested. Board Staff also support Union’s well licence applications subject to Union or MNRF placing on the record MNRF’s final comments in support of the project.

In regard to the conditions of approval Board Staff have proposed that condition 2 be removed from the draft conditions originally proposed as part of Board Staff Interrogatory #5. Union has no issues with this condition being removed and understands that if well drilling is not started within 12 months of the date of issue of the well drilling permit, the permit will automatically expire. Union has no other concerns with the proposed conditions of approval and can accept the proposed conditions.

Union has reviewed the submissions of the MNRF dated March 5, 2018. It is Union’s position that these submissions address the issues identified by Board Staff in relation to compliance with CSA Code. MNRF in their submissions make the following statements “MNRF can support Union’s 2018 Bickford Storage Enhancement project subject to the Board Staff’s proposed conditions of approval”.

Ministry of Natural Resources and Forestry

In MNRF's submission dated March 5, 2018 MNRF states that "MNRF is satisfied that the application meets the CSA Z341.1-14", and that "MNRF can support Union's 2018 Bickford Storage Enhancement Project, subject to the Board Staff's proposed conditions of approval".

Summary

As Board Staff and MNRF supports Union's application it is Union's position that it has addressed all of the issues raised in the proceeding and requests that the Ontario Energy Board approve Union's application.

Sincerely,

[original signed by]

W.T. (Bill) Wachsmuth RPF
Senior Administrator, Regulatory Projects
:sb

cc: Nancy Marconi, OEB
Zora Crnojacki, OEB
Andrew Mandyam, Enbridge
Tania Persad, Enbridge
Demetrius Kappos, MNRF