



February 20, 2009

VIA OVERNIGHT DELIVERY
AND ELECTRONIC TRANSMISSION

Ms. Kirsten Walli
Board Secretary Ontario Energy Board
PO Box 2319
2300 Yonge Street 27th Floor
Toronto, Ontario M4P 1E4

Re: EB-2008-0411- Union Gas Limited ("Union")
Leave to Sell 11.7MM Natural Gas Pipeline

Dear Ms. Walli:

Pursuant to the Ontario Energy Board's ("Board") Notice of Application of February 3, 2009 enclosed please find the original and two copies of Intervention of Bluewater Gas Storage, LLC.

Kindly acknowledge receipt of these documents by time stamping the extra copy and returning to the undersigned in the envelope provided with this letter.

Please contact the undersigned if you have any questions.

Very Truly Yours,

A handwritten signature in black ink, appearing to be "John D. Reid", written over a horizontal line.

John D. Reid
Vice President

cc: Sharon Wong, Counsel for Union Gas (Blake, Cassels & Graydon (via email)
Mark Murray, Manager, Regulatory Projects and Lands Acquisition, Union Gas
(via email)

Bluewater Gas Storage, LLC

333 Clay Street, Suite 1600 (77002) ■ P.O. Box 4648 ■ Houston, Texas 77210 ■ 713/646-4100 or 800-564-3036

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. C.15, Schedule B; and in particular s. 43(1)(b) thereof.

AND IN THE MATTER OF an Application by Union Gas Limited for an order granting Union Leave to sell 11.7km of NPS 24 pipeline running from Union's St. Clair Valve Site to the Bickford Compressor Site and related measurement and control equipment.

INTERVENTION OF BLUEWATER GAS STORAGE, LLC.

1. Bluewater Gas Storage, LLC ("BGS" or the "Company") hereby applies for intervenor status in this proceeding pursuant to the above-captioned matters.
2. BGS owns and operates a natural gas storage facility in St. Clair County, Michigan that currently interconnects with the facilities of Union Gas Limited ("Union").
3. BGS directly and on behalf of its customers uses Union's transportation services pursuant to rate schedules approved by the Board, which may be impacted by the proposed sale of the St. Clair line.
4. At this time, it is the intention of BGS to monitor this proceeding, however, after reviewing the evidence, BGS may address one or more of the issues.
5. BGS reserves the right to be heard in English, to appear by or with counsel of its choice, to cross-examine on all subject matters in this hearing that may relate to its interests, to adduce evidence on specific matters that are relevant to these proceedings, and to present argument.
6. BGS requests a copy of the evidence and submissions of the Applicant and other intervenors, and any notices or correspondence to be forwarded to:

(a)

John D. Reid
Bluewater Gas Storage LLC

Address for personal service: 333 Clay Street, Suite 1100
Houston, Texas 77002

Houston, Texas 77002

Mailing Address: 333 Clay Street, Suite 1100
Houston, Texas 77002

Telephone: (713) 652-3671
Fax: (713) 652-3700
E-Mail: jdreid@paalp.com

and

(b) Eileen Wilson Kisluk
Bluewater Gas Storage LLC

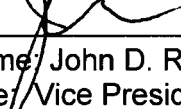
Address for personal service: 333 Clay Street, Suite 1600
Houston, Texas 77002

Mailing Address: 333 Clay Street, Suite 1600
Houston, Texas 77002
Telephone: (713) 993-5203
Fax: (713) 646-4216
E-Mail: ewkisluk@paalp.com

BGS will not be seeking an award of costs.

Dated this 20th day of February, 2009

Bluewater Gas Storage, LLC

By: 
Name: John D. Reid
Title: Vice President