

Board Staff Interrogatories

Dawn Deliverability Project

Union Gas Limited

EB-2007-0633 / 0661

General Issues

1. Please describe the existing and planned surface facilities, such as gathering pipelines and access roads, needed for the proposed wells' construction and operation.

Reference: Section 4/ Schedule 8/ Pages 1 and 2

- 2 The referenced tables show a detailed construction schedule for the project.
 - a) Please verify that this schedule remains accurate.
 - b) If there are any changes, please provide an explanation for the schedule change.

Reference: Section 4/ Page 9

- 3 The evidence states that "three wells (D.59, D.85 and D.139) in the 59-85 Pool will be abandoned as part of this project."
 - a) Please explain why the wells will be abandoned.

Reference: Section 4/ Page 10

4. The evidence states that "the pipelines will be installed in accordance with all applicable codes and Union's standard pipeline construction procedures."
 - a) Please explain Union's standard pipeline construction procedures if different than what is provided in Section 4/ Schedule 7 / Pages 1-3.

Reference: Section 5/ Page 12

5. The evidence states that "Union will comply with the intent of all relevant local by-laws, to the extent possible. Union intends to apply for all permits that are required."

- a) Should it not read "Union will comply with all relevant local bylaws" and "Union will apply for all permits that are required."?
- b) Please identify all the permits and approvals that Union Gas requires to construct and operate the proposed wells and pipelines.

Environmental Impacts of Drilling and Landowner Related Issues

7. Please discuss potential impacts of drilling and operating of the proposed wells and describe Union's plan for impact mitigation, monitoring and tracking landowner complaints.
8. Please describe communication with any landowners in the designated storage area whose fresh water wells may be impacted by the proposed well drilling and operation.
9. Please describe the status of the land rights that Union requires to construct and operate the proposed wells and gathering lines.

Tree Planting Issues

10. Reference: Environmental Report/ Pages 6.11, 9.6, 9.8

The Environmental Report states: "The effects of any vegetation impacts, such as woodlot fragmentation will be minimized through careful pipeline alignment and implementation of Union Gas's Tree Replanting Program."

The Environmental Report also states... "Union Gas will also implement their Tree Replacement Program to replace twice the area removed with seedlings from Ontario".

- a) Please confirm that the replacement of trees will be part of the site restoration since it was not detailed in the restoration segment in Section 4 / Schedule 7 / Page 3 of Union's application.
- b) Please provide details of Union's Tree Replacement Program.

Monitoring

11. Reference: Environmental Report/ Pages 10.1 and 10.2

The Report discusses the need for current and long term monitoring of this project by Union Gas. For example, the Report states that: "Union Gas's inspection program should include annual monitoring (of trees planted) until a free-to-grow condition is reached".

- a) Who observes whether Union Gas has carried out this monitoring and checks the outcomes 2 to 5 years down the road?
12. Please provide a status update on consultations with Aboriginal communities with regard to the following points:
- a) Identify all of the Aboriginal groups that have been contacted in respect of this application.
 - b) Indicate:
 - i) how the Aboriginal groups were identified;
 - ii) when contact was first initiated;
 - iii) the individuals within the Aboriginal group who were contacted, and their position in or representative role for the group;
 - iv) a listing, including the dates, of any phone calls, meetings and other means that may have been used to provide information about the project and hear any interests or concerns of Aboriginal groups with respect to the project.
 - c) Provide relevant information gathered from or about the Aboriginals as to their treaty rights, or any filed and outstanding claims or litigation concerning their treaty rights or treaty land entitlement or aboriginal title or rights, which may potentially be impacted by the project.
 - d) Provide any relevant written documentation regarding consultations, such as notes or minutes that may have been taken at meetings or from phone calls, or letters received from, or sent to, Aboriginal groups.
 - e) Identify any specific issues or concerns that have been raised by Aboriginal groups in respect of the project and, where applicable, how those issues or concerns will be mitigated or accommodated.
 - f) Explain whether any of the concerns raised by Aboriginal groups with respect to the applied-for project have been discussed with any government department or agencies, and if so, identify when contacts were made and who was contacted.
 - g) If any of the Aboriginal groups who were contacted either support the application or have no objection to the project proceeding, identify those groups and provide any available written documentation of their position. Also, indicate if their positions are final or preliminary or conditional in nature.

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- h) Provide details of any know Crown involvement in consultations with Aboriginal groups in respect of the applied-for project.