



uniongas

A Spectra Energy Company

November 21, 2007

Ministry of the Environment
733 Exeter Road
London, Ontario
N6E 1L3

Attention: Craig Newton, Regional Environmental Planner

Dear Mr. Newton:

Re: Union Gas Limited

**Leave to Construct Natural Gas Pipeline To East Windsor
Cogeneration Centre, Ontario Energy Board No. EB-2007-0708**

Thank you for your letter dated November 15, 2007 concerning the review of Union's "East Windsor Cogen Centre Pipeline Project Environmental Report".

In response to your comments regarding these issues, we offer the following:

- a) The MOE has identified an area of PCB and metal contamination in a localized area of sediments and dredge material in and along the Grand Marais Drain between the CPR crossing and Chrysler Centre Road. Remediation of the sites are planned for the summer of 2008. The letter also addresses the potential for the pipeline corridor to collect contaminants and serve as a conduit for the movement of the contaminants. In discussions with the affected landowners, Union was made aware of this issue after the Environmental Report had been completed.

Union will retain the services of an Environmental Consultant to review the issues, as presented in the letter; and work with the property owners and the MOE to determine the extent of the contamination along the pipeline route, and develop mitigation measures to contain and prevent the possible migration of contaminants along the pipeline.

The consultant will also work with the MOE and the Project Leads (City of Windsor and a Private Partner) to generate a strategy which will allow for the installation of the pipeline in conjunction with the planned remediation of the sites.

- b) As noted in your letter, a Closed Waste Disposal Site X-6065 is located in the general vicinity of Drouillard Road and Seminole Street in the City of Windsor and "appears" to be located within 500 metres from the preferred route of the pipeline.

Union's Environmental Consultant will review the MOE June 1991 Waste Disposal Site Inventory report. If it is determined that there is a waste disposal site that will impact the proposed pipeline, Union will ensure that all aspects of Section 46 of the Environmental Protection Act, as well as the MOE Guideline, D-4, will be followed.

- c) The MOE Sarnia District and Southwest Region has identified issues with the management of drilling fluids used in horizontal drilling. As well, the District has concerns where risk management is necessary to prevent the contamination of the pipeline corridor from historical sources of contamination.

Union Gas is in the process of reviewing their best practices for the environmental management of the handling and disposal of drilling fluids. As previously mentioned, Union's Environmental Consultant will be investigating methods to mitigate the potential of contaminants migrating along the pipeline corridor, which may also be applied to horizontal drilling.

- d) You have indicated that tree clearing in the study area may have restrictions under the Canadian Food Inspection Agency (CFIA) due to Emerald Ash Borer infestation.

Union has worked closely with the CFIA in past projects and is aware of the restrictions in place for the handling of any Ash material. It is not anticipated that tree removal will be necessary along the pipeline route; however, if Ash material is removed, proper precautions will be taken to ensure compliance with those regulations.

- e) Union Gas appreciates your reference to the error made in the Project Environmental Report pertaining to the discharge location of Grand Marais Drain / Turkey Creek.

If you have any further questions or comments regarding the project, please contact me at 1-800-571-8446 x 2936 or at npdumouchelle@spectraenergy.com.

Yours truly,

UNION GAS LIMITED



Norm Dumouchelle
Environmental Planner

Copies to:

Mr. Josh Wasylyk, Application Analyst, Ontario Energy Board
Mr. C. LaFrance, Technical Support Manager, MOE Southwestern Region
Ms. P. Almost, Issues Project Coordinator, MOE Sarnia / Windsor District
Ms. M. LeGrow, Senior Program Support Coordinator, MOE, EAAB, Toronto
Mr. K. Ferguson, Area Supervisor, MOE Windsor Area Office