

COUNTY OF MIDDLESEX

COUNTY ENGINEER'S OFFICE

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January 25, 2011

Ontario Energy Board
PO Box 2319
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2300 Yonge Street
Toronto, ON M4P 1E4

Attn: Board Secretary

**Re: Notice of Application and Written Hearing for Leave to Construct Natural Gas Pipeline and Ancillary Facilities in the City of London and the Municipality of Middlesex Centre, in the County of Middlesex
EB-2010-0381**

The County of Middlesex recently (July 2010) took over jurisdiction of Wonderland Road from Medway Road to Ilderton Road from the Municipality of Middlesex Centre. The right of way width of Wonderland Road is 20 metres, other than in a few small areas. This is well below the width of 36 metres as prescribed in the County Official Plan for arterial roadways. This road is scheduled for reconstruction sometime in the next five years, and likely to begin in 2013.

We have serious concerns about the impact of the pipeline if installed within the existing road allowance along the proposed "preferred" route. The narrow right of way width will place the pipeline in close proximity and/or underneath road infrastructure including culverts, catch basins, and drainage ditches, as well as impact on several municipal drains in the area. There are also serious impacts and restrictions that a natural gas pipeline in this narrow right of way will have on the County's normal construction and maintenance practices. Construction within five years will very likely necessitate relocation of the pipeline and will cause significant impacts on local land owners who will have to deal with the disruption caused by two major projects in a short time span.

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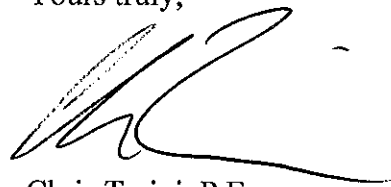
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In our opinion the preferred route selection as identified in the environmental report prepared by Azimuth Environmental Consulting Inc. is flawed. They did not examine the impacts of pipeline installation in the narrow right of way. They did not consider the future restrictions and additional cost impacts that would be incurred by Middlesex County for future construction and maintenance due to regulations around working near natural gas utilities. They did not identify the impact on residents in the area due to the installation of the pipeline just prior to the reconstruction of the road. The claim in Table 2: Alternative Route Evaluation and Comparison that Wonderland Road allowance width is acceptable for pipeline construction is false. More importantly no evaluation was given for any route crossing private property in an easement either adjacent to the road allowance or mid-block through mostly agricultural areas, an option that has been utilized by Union Gas for transmission pipelines in other areas within Middlesex County. This evaluation must be considered before Middlesex County can accept the environmental report as complete.

Middlesex County has been working with Union Gas staff to identify alternatives adjacent to the road allowance, but object to the designation of the road allowance of Wonderland Road North as the preferred route.

The County requests an oral hearing as well as intervenor status. We cannot support the installation along the proposed preferred route as identified by Union Gas within the road allowance of County Road 56 (Wonderland Road North). An oral hearing will allow for the County to properly voice their concerns with the proposed routing.

Yours truly,

A handwritten signature in black ink, appearing to read 'Chris Traini', with a stylized flourish at the end.

Chris Traini, P.Eng.
County Engineer
County Engineer's Office

cc.: Mark Murray, Manager, Regulatory Projects & Lands Acquisition, Union Gas Limited
Dan Jones, Assistant General Counsel, Union Gas Limited
John Lucas, Manager, Transportation Planning & Design, City of London
Maureen Looby, Manager, Public Works and Engineering, Middlesex Centre