

Ministry of Natural Resources
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VIA E-MAIL: RESS filing

Our File No. 948-22-0009

March 18, 2011

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

**RE: Union Gas Limited – Applications for Jacob Pool Storage Development
File Numbers EB-2011-0013/ EB-2011-0014/ EB-2011-0015**

Dear Madam,

I am writing to request that the Ministry of Natural Resources ("MNR") be granted Intervenor Status in the above-noted matter.

The MNR regulates storage wells and the activities associated with well licences under the *Oil, Gas and Salt Resources Act* ("OGSRA"), Ontario Regulation 245/97 made under the OGSRA, and the Oil, Gas and Salt Resources Operating Standards. The MNR therefore has a direct regulatory interest in storage operations, specifically storage wells and storage pool operating pressures. In particular, the MNR has both the expertise and an interest in the integrity of the storage operations and other subsurface activities, including cavern storage, upstream oil and gas drilling production, and salt solution mining. As an Intervenor, the MNR can assist the Board in ensuring ongoing safety and compatibility of these subsurface activities proposed under Union Gas Limited's proposed designated gas storage area.

The MNR does not have any preference as to whether the hearing should be written or oral.

The MNR does not intend to seek an award of costs on this matter.

Yours truly,

Demetrius Kappos
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Legal Services Branch
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