

Ministry of Natural Resources
Legal Services Branch
3rd floor, Room 3420
99 Wellesley Street West
Toronto ON M7A 1W3
Fax: (416) 314-2030
Direct Line (416) 314-2007

Ministère des Richesses naturelles
Division des services juridiques
3^e étage, bureau 3420
99, rue Wellesley ouest
Toronto ON M7A 1W3
Télééc: (416) 314-2030



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,

A handwritten signature in black ink, appearing to read "DK", with a long horizontal flourish extending to the right.

Demetrius Kappos
Counsel
Legal Services Branch
e-mail: demetrius.kappos@ontario.ca

Copied to: Mr. Mark Murray, Manager, Regulatory Projects & Lands Acquisition, Union Gas Limited (via e-mail: mmurray@spectraenergy.com);
Mr. Dan Jones, Assistant General Counsel, Union Gas Limited (via e-mail: dxjones1@uniongas.com);
Mr. Dan Elliott and Mr. Jug Manocha, Petroleum Resources Centre, MNR (via e-mail)