

September 24, 2014

BY COURIER & RESS

Ms. Kirsten Walli,
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: EB-2012-0391
Bentpath Rosedale Pool - Well Drilling Project

Further to the Report of the Board as issued on December 20, 2012 and in particular with reference to Condition of Approval 3.1 and 3.3, we now enclose Union's Final Monitoring Report.

Sincerely,

[original signed by]

Shelley Bechard
Administrative Analyst, Regulatory Projects
:sb
Encl.

cc: Ms. Pascale Duguay, Manager Natural Gas Applications
Wendy Sullivan, MNR

2013 BENTPATH ROSEDALE PROJECT FINAL MONITORING REPORT

Prepared by: Union Gas Limited
Environmental Planning
September 2014

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2013 Bentpath-Rosedale Project Final Monitoring Report

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1.0 INTRODUCTION

This Final Monitoring Report is provided in compliance with the Ontario Energy Board (“Board”) Order EB-2012-0391 granting Union Gas Limited (Union) approval of the Well Drilling Application on December 20, 2012, for the drilling of one observation well, Union Bentpath 13, Dawn 8-32-V located on Lot 32, Concession V, in the Township of Dawn-Euphemia.

The Project included drilling a new A2 Unit observation well (Union Bentpath 13) in the Bentpath Pool. The new well will be used to monitor the pressure changes in the A2 Unit and other shallower formations during the proposed delta pressuring.

The requirements for and details of this report are outlined in the specific Conditions of Approval issued by the Board in its Order EB-2012-0391 dated December 20, 2012 as listed below. The Conditions of Approval can be found in Appendix “B”.

Accordingly, the purpose of this Interim Monitoring Report is to fulfill these conditions.

1.0 Condition 1.1

Union Gas Limited (“Union”) shall rely on the evidence filed with the Board in EB-2012-0391 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed well.

2.0 Condition 2.1

Union shall construct the facilities and restore the land in accordance with its Application and evidence given to the Board, except as modified by this Order and these Conditions of Approval

Condition 2.2

Union shall ensure that the movement of equipment is carried out in compliance with all procedures and plans filed with the Board, and as follows:

- i) *Union shall make reasonable efforts to keep the affected landowner as well as adjacent landowners and their representative tenant farmers, or their designated representatives, informed of its plans and construction activities; and*
- ii) *the installation of facilities and construction shall be coordinated so as to minimize disruption of agricultural land and agricultural activities.*

Condition 2.3

Union shall, subject to the recommendation by an independent tile contractor and subject to the landowners approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

Condition 3.1

Both during and after construction, Union shall monitor the impacts of construction, and shall file four copies of both an interim and final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date and the final monitoring report shall be filed within fifteen months of the in-service date. Union shall attach a log of all complaints to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.

Condition 3.3

The final monitoring report shall describe the condition of the rehabilitated land and the effectiveness of the mitigation measures undertaken. The results of the monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.

2.0 BACKGROUND

Construction was initiated in November 2012 with topsoil stripping, the installation of new permanent roads and pads and the installation of pre-construction fencing. The Ministry of Natural Resources Well Drilling Licences were released on January 9, 2013. Drilling began on January 29, 2013 and was completed on April 1, 2013. The well was placed into service on June 24, 2013. Cleanup began on November 7, 2013 with the reduction of the temporary well pads to their permanent configuration including the removal of gravel and geotechnical material followed by discing of the soils in preparation for seeding in the spring of 2014.

Union returned to the right-of-way in spring 2014 to complete the following activities: repair any subsidence on the right-of-way, seed all disturbed areas, perform a general overview of the right-of-way and complete any additional clean-up that may have been required.

3.0 POTENTIAL IMPACTS AND MITIGATION

3.1 Condition 1.1

Union Gas Limited ("Union") shall rely on the evidence filed with the Board in EB-2012-0391 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed well.

Union has adhered to all evidence filed with the Board and has complied with all applicable laws, regulations and codes pertaining to the construction of the well.

3.2 Condition 2.1

Union shall construct the facilities and restore the land in accordance with its Application and evidence given to the Board, except as modified by this Order and these Conditions of Approval

Union has constructed the facilities according to the evidence filed in support of its application and in accordance with all mitigation measures as identified in Schedule 13 of the evidence.

3.3 Condition 2.2

Union shall ensure that the movement of equipment is carried out in compliance with all procedures and plans filed with the Board, and as follows:

- i) Union shall make reasonable efforts to keep the affected landowner as well as adjacent landowners and their representative tenant farmers, or their designated representatives, informed of its plans and construction activities; and*
- ii) the installation of facilities and construction shall be coordinated so as to minimize disruption of agricultural land and agricultural activities.*

- i) Prior to any activity associated with the development, the Lands Agent met with the landowners to discuss and identify any concerns.

The Lands Agent was available during construction to answer questions and address concerns through the Landowner Relations Program.

- ii) After meeting with the landowners and reviewing their needs, the facilities were located so as to serve the requirements of Union and minimize any inconvenience to farming operations.

All well work was completed on gravel pads with travel to the well restricted to gravel roadways. This allowed all weather access to the well locations with no additional impact to adjacent lands.

3.4 Condition 2.3

Union shall, subject to the recommendation by an independent tile contractor and subject to the landowners approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

The agricultural land use prior to construction was pasture with no systematic drainage system. No pre-construction or post construction tiling was required.

3.5 Condition 3.1

Both during and after construction, Union shall monitor the impacts of construction, and shall file four copies of both an interim and final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date and the final monitoring report shall be filed within fifteen months of the in-service date. Union shall attach a log of all complaints to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.

3.5.1 Report Circulation

Four (4) copies of this Final Monitoring Report are provided to the Board.

3.5.2 Landowner Concerns

To date there have been no outstanding comments or complaints entered into Union's complaint tracking system. Union will continue to monitor the state of the land and the environment and will address any additional landowner concerns, if they should arise. Union will ensure that the landowner is provided access to a Union Gas representative during operations of the facilities.

3.6 Condition 3.3

The final monitoring report shall describe the condition of the rehabilitated land and the effectiveness of the mitigation measures undertaken. The results of the monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.

3.6.1 Monitoring Programs

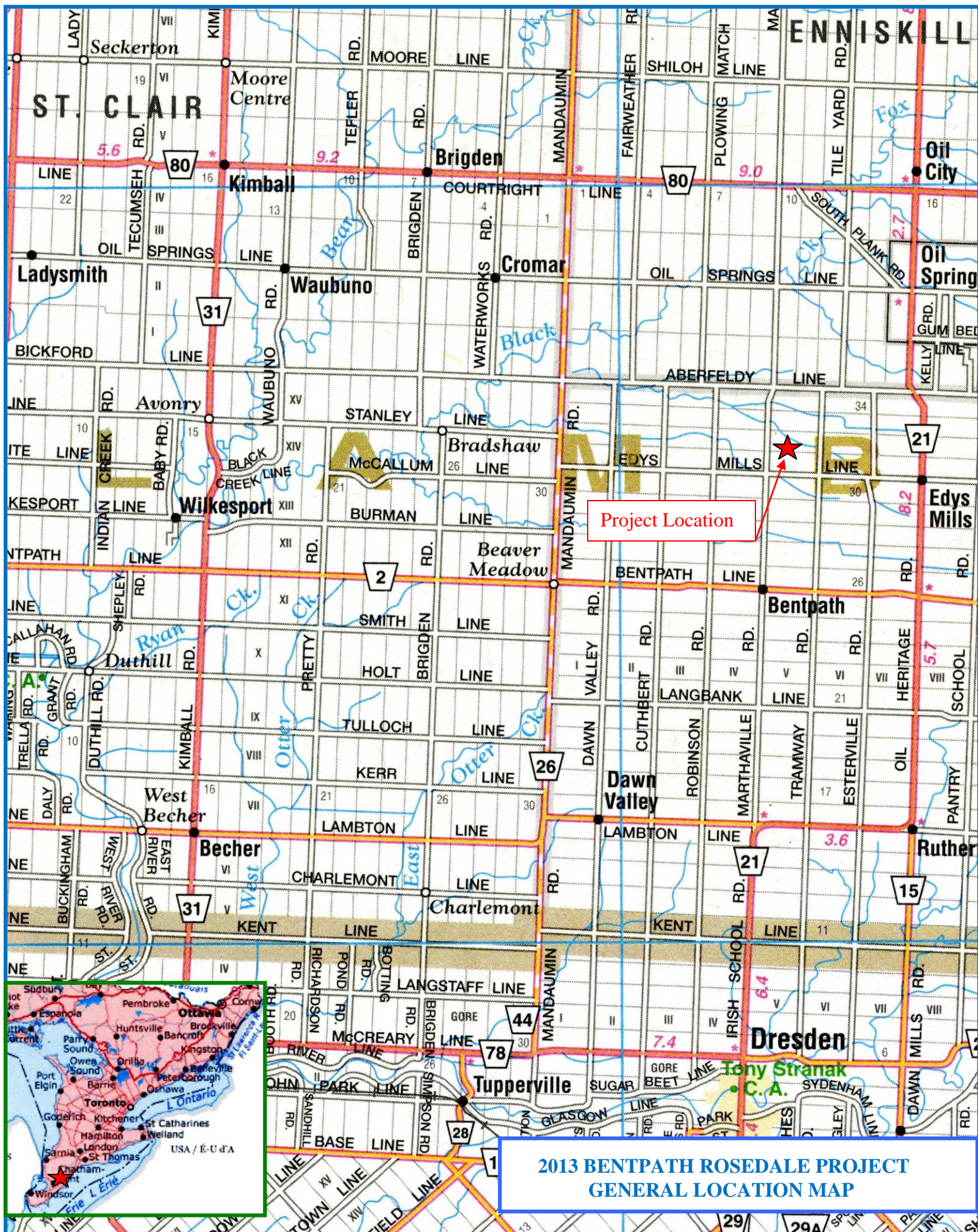
The previously filed Interim Monitoring Report provides a description of the successfully completed monitoring programs (Water Well, Soil, Archaeology, Species At Risk) undertaken prior to, during and following construction to monitor the effects of construction.

4.0 SUMMARY

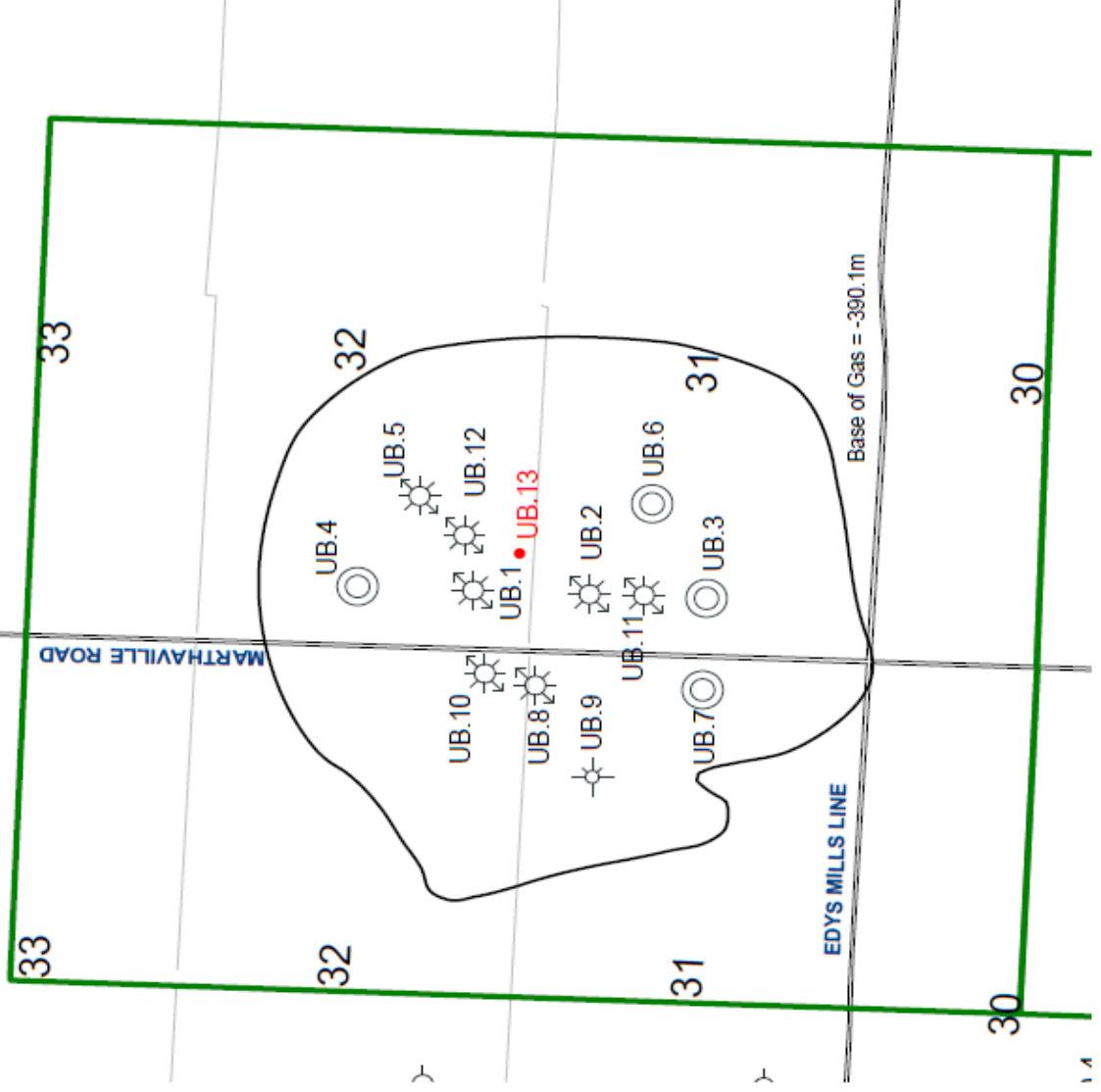
This Final Monitoring Report has been prepared as per conditions in the Board Order EB-2012-0391. The report provides an outline of Union's compliance with the commitments of its pre-filed evidence, the measures implemented during construction to minimize disturbance to the environment and a description of Union's monitoring programs. It is anticipated that these measures will effectively eliminate any long-term impacts to the environment.

“Appendix A”

Location Map



BENTPATH



LEGEND

- Injection/Withdraw Well
- Observation Well
- Proposed Well
- Base of Gas
- DSA - Union Gas

SCALE



SQUARES

UNION GAS LIMITED

Bentpath Pool
Location Map

DATE: 2013
BY: [Signature]
REV: 1.0

“Appendix B”

Conditions of Approval

**Union Gas Limited
EB-2012-0391**

Conditions of Approval

Well Drilling Licence

1. General Requirements

- 1.1. Union Gas Limited ("Union") shall rely on the evidence filed with the Board in EB-2012-0391 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed well.
- 1.2. Authorization for the issuance of the drilling licence is limited to twelve months from the date of the Board's Report to the Ministry of Natural Resources.
- 1.3. The authority granted under this Order to Union is not transferable to another party without leave of the Board. For the purpose of this Condition, another party is any party except Union Gas Limited.

2. Construction Requirements

- 2.1. Union shall construct the facilities and restore the land in accordance with its Application and evidence given to the Board, except as modified by this Order and these Conditions of Approval.
- 2.2. Union shall ensure that the movement of equipment is carried out in compliance with all procedures filed with the Board, and as follows:
 - i) Union shall make reasonable efforts to keep the affected landowner as well as adjacent landowners and their respective tenant farmers, or their designated representatives, informed of its plans and construction activities; and
 - ii) the installation of facilities and construction shall be coordinated so as to minimize disruption of agricultural land and agricultural activities.
- 2.3. Union shall, subject to the recommendation by an independent tile contractor and subject to the landowners approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

- i) Union shall make reasonable efforts to keep any affected landowner, as well as adjacent landowners and their respective tenant farmers, or their designated representatives, informed of its plans and construction activities; and
- ii) the installation of facilities and construction shall be coordinated so as to minimize disruption of agricultural land and agricultural activities.

3.3 Union shall, subject to the recommendation of an independent tile contractor and subject to the landowners' approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

3.4 Union shall implement all the recommendations identified in Schedule 11 of the pre-filed evidence.

4 Monitoring and Reporting Requirements

4.1 Both during and after construction, Union shall monitor the impacts of construction, and shall file four copies of both an interim and a final monitoring report with the Board and the Ministry of Natural Resources. The interim monitoring report shall be filed within six months of the in-service date, and the final monitoring report shall be filed within fifteen months of the in-service date. Union shall attach a log of all comments and complaints to the interim and final monitoring reports. The log shall record the times of all comments and complaints received, the substance of each comment and complaint, the actions taken in response, and the reasons underlying such actions.

4.2 The interim monitoring report shall confirm Union's adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction.

4.3 The final monitoring report shall describe the condition of the rehabilitated land and the effectiveness of the mitigation measures undertaken. The results of the

monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.

5 Other Requirements

- 5.1 For the purposes of these conditions conformity of the Applicant with CSA 341.1-02 shall be to the satisfaction of the Ministry of Natural Resources.
- 5.2 Union shall designate one of its employees as project manager who will be responsible for the fulfilment of these conditions, and shall provide the employee's name to the Ministry of Natural Resources, the Board and to all appropriate landowners.
- 5.3 The Board's designated representative for the purpose of these Conditions of Approval shall be the Manager, Facilities.