

500 Consumers Road
North York, Ontario
M2J 1P8
PO Box 650
Scarborough ON M1K 5E3

Shari Lynn Spratt
Supervisor Regulatory Proceedings
Telephone: (416) 495-6011
Fax: (416) 495-6072
Email: EGDRegulatoryProceedings@enbridge.com



January 26, 2015

VIA COURIER, EMAIL, RESS

Ms. Kirsten Walli
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 26th Floor
Toronto, ON M4P 1E4

Re: Enbridge Gas Distribution Inc. ("Enbridge")
EB-2014-0288 - Chatham D Designated Storage Area Amendment
Reply Submission

The Ontario Energy Board ("Board") issued Procedural Order No. 1 on December 19, 2014 wherein the Board directed Enbridge to file its reply submission by January 26, 2015.

Attached please find Enbridge's reply submission which has been filed through the Board's Regulatory Electronic Submission System.

For further information about the project, please visit the Enbridge website at:
www.enbridgegas.com/ChathamD

Yours truly,

(ORIGINAL SIGNED)

Shari Lynn Spratt
Supervisor Regulatory Proceedings

cc: Ms. Pascale Duguay, Manager Natural Gas Applications, Ontario Energy Board

Attachment

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998,
S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an application by Enbridge Gas
Distribution Inc. under sections 36.1(1)(b) and 38 of the Act
for an order or orders amending the designated storage
area of the Chatham 7-17-XII Pool in the Municipality of
Chatham-Kent;

REPLY SUBMISSIONS OF ENBRIDGE GAS DISTRIBUTION INC.

PART I. Introduction

1. Enbridge Gas Distribution Inc. ("**Enbridge**") is making its reply submissions in support of its application for an amendment to the Designated Storage Area ("DSA") of the Chatham 7-17-XII Pool and for authorization to inject into, store gas in and remove gas from the amended DSA.
2. Enbridge has reviewed Board Staff submissions which support Enbridge's request. No other submission was made and Enbridge is not aware of any unaddressed issue or concern.

PART II. Submissions

3. The Board is guided by the objectives included in the *Ontario Energy Board Act, 1998* (the "**Act**"), Section 2, paragraph 4 which includes the specific objective "*to facilitate rational development and safe operation of gas storage*".
4. The evidence is the most recently gathered three dimensional seismic information on the pool obtained in 2012 and analysed by an independent consultant. This information indicates the storage area extends beyond the current boundaries of the DSA.¹
5. The Application does not amend the facilities used to serve the pool nor does it change the overall capacity and deliverability of the pool.
6. The DSA should include the areas in which gas is stored. Including the relatively small additional area in the DSA will help ensure adequate distances are maintained from other potential drilling operations thereby helping ensure the safe operation of the storage facility.

¹ EB-2014-0288, Exhibit B, Tab 1, Schedule 2, page 4 of 9, paragraph 6 to 11.

7. The Ministry of Natural Resources and Forestry ("**MNR**") agrees the DSA should be amended as requested by Enbridge.²
8. Enbridge has concluded the negotiation of agreements with the individual impacted landowners³ and is working towards an agreement with the Municipality of Chatham-Kent⁴, the only other impacted landowner.

PART IV. Conclusion

9. Enbridge respectfully requests the Board grant the amendment to the designated storage area pursuant to section 36.1(1)(b) of the Act and grant Enbridge the authority to inject gas into, store gas in and remove gas from the amended designated storage area.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated: January 26, 2015

AIRD & BERLIS LLP
Barristers and Solicitors
Brookfield Place
181 Bay Street, Suite 1800
Toronto, Ontario
M5J 2T9

Scott Stoll (LSUC #45822G)
Tel: 416.865.4703
Fax: 416.863.1515

Counsel for Enbridge Gas Distribution Inc.

² EB-2014-0288, Response to Board Staff I.R. #2, Attachment.

³ EB-2014-0288, Exhibit C, Tab 1, Schedule 1, page 1, paragraph 3.

⁴ EB-2014-0288, Response to Board Staff I.R. #1(a).