

**Ministry of Natural Resources
and Forestry**

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**Ministère des Richesses naturelles
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Via RESS filing, e-mail and courier (2 hard-copies to Board)

Our File No. 939-11-0088

May 13, 2015

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RE: Pembina Infrastructure and Logistics LP

- **Board File Number: EB-2015-0032**
- **Application for a permit to drill hydrocarbon injection/withdrawal wells and to expand its storage capacity in salt solution mined caverns in its Corunna Storage Terminal, located in the Township of St. Clair in Lambton County, within 1.6 kilometres of the Moore 3-21-XII natural gas storage pool operated by Enbridge Gas Distribution Inc.**

Dear Madams,

In accordance with the Board's revised Procedural Order, below you will find the written interrogatories of the Ministry of Natural Resources and Forestry to the Applicant:

1. Reference: Pre-filed Evidence: Application at pp. 4-7, ss. 1.0, 4.1, 4.2:

On pp. 4-5 of the application, toward the end of s. 1.0, the Applicant appears to seek approvals for the conversion of cavern 45 and ten other solution-mined caverns into hydrocarbon storage caverns. However, at pp. 6-7, ss. 4.1 and 4.2, only the conversion of Cavern 45 is discussed in detail.

Is the application seeking approval for the ten other conversions at this time, and if so, what is the detailed description of those ten other conversion processes?

2. Reference: Pre-filed Evidence: Application at p. 16, s. 12.0:

The application at p. 16, s. 12.0, indicates that a risk assessment is yet to be completed. Nowhere in the application does the applicant set out the nature and substance of any risk assessment as contemplated.

- a. Please confirm our understanding as set out above.
- b. Is the applicant proposing to complete a risk assessment?
- c. Will the risk assessment be conducted in accordance with CSA Z341 s. 7.1: *Risk Assessment* and s. 7.2: *Assessment of Neighbouring Activities*?
- d. When will the risk assessment be conducted?
- e. Please provide details as to the nature and substance of the yet to be conducted risk assessment.

3. Reference: Pre-filed Evidence: Application at pp. 16-17, s. 13.0:

The application at pp. 16-17, s. 13.0 discusses geomechanical assessment.

- a. Please confirm whether and how these works meet the requirements of CSA Z341 s. 7.3: *Geological Studies*.
- b. Has the applicant updated the studies from 1995 described at s. 13.0 of its application? If yes, please provide us with a copy.

- c. Has the applicant completed modelling of the new proposed storage caverns for their structural integrity? Please provide details.

4. Reference: Pre-filed Evidence: Application at pp. 15-16, s. 11.0:

The application at pp. 15-16, s. 11.0, describes the applicant's current Emergency Response Plan in place at the Corunna Facility and its proposed expansion to include all proposed new hydrocarbon storage caverns, including updating notification provisions.

- a) Please confirm that the emergency response shall be in accordance with the requirements of CSA Z341.2-14 s. 10.1.2 Emergency Response Plan.
- b) Please advise how the neighbours to the subject property and the Ministry of Natural Resources and Forestry would be notified in the event of an emergency.

Yours truly,

A handwritten signature in black ink, consisting of a stylized, overlapping loop and a long, sweeping horizontal stroke extending to the right.

Demetrius Kappos
Counsel
Legal Services Branch

c.: All Intervenors on the attached List (by email)

**Pembina Infrastructure and Logistics LP
EB-2015-0032**

List of Intervenors

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