

**Ministry of Natural Resources
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Via RESS filing, e-mail and courier (2 hard-copies to Board)

Our File No. 939-11-0088

May 25, 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,

The MNRF has now had an opportunity to review the Applicant's responses to the MNRF interrogatories, found in the Applicant's filed correspondence dated May 21, 2015.

The MNRF is not satisfied with the content of the responses provided.

In two areas, described below, in our view the responses provided were insufficient responses to the interrogatory posed. We respectfully ask the Board to direct the Applicant to provide fuller answers, in accordance with the Board's power to do so as set out in s. 27.03 of the Rules.

1. RE: MNRF Interrogatory #2:

- a) Will you confirm that s. 12.0: *Risk Assessment* in the Application does not address the requirements of s. 7.1 *Risk Assessment* and the related requirements of s. 7.2 *Assessment of Neighbouring Activities* of CSA Z341?
- b) What aspects of sections 7.1 and 7.2 of CSA Z341 cannot be conducted at this time in light of the Applicant's stated reason for noncompletion of a risk assessment, being: *"As business demands will determine the product and flow rate required in each cavern, a risk assessment cannot be performed until this information is confirmed."*

2. RE: MNRF Interrogatory #3:

In light of the fact that there has been no update to the previous geomechanical assessments completed in 1987, 1992 and 1995:

- (a) Does the Applicant have a qualified opinion as to the current adequacy of these dated assessments, and if so, can we be provided with that opinion along with the geomechanical assessments?
- (b) The Applicant indicates in its interrogatory response that it is *"currently exploring options to update the geomechanical assessment"*. What are the "options" being explored and when does the Applicant expect a selected option to be completed and implemented?

Yours truly,



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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