

June 12, 2015

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Ontario Energy Board Applications Division PO Box 2319 #2700, 2300 Yonge Street Toronto, Ontario M4P 1E4

Attention: Mr. John Pickernell

**Application Administration** 

Dear Mr. Pickernell:

Re: Pembina Infrastructure and Logistics LP ("Pembina")

Application for a permit to drill hydrocarbon injection and withdrawal wells within the vicinity of the Moore 3-21-XII Designated Storage Area and to expand the storage capacity at the Corunna Storage Terminal (the "Application")

Adjournment Request regarding Procedural Order No. 2

Board File No.: EB-2015-0032

The Ontario Energy Board's ("OEB") Procedural Order No. 2 sets out a schedule for the written hearing in this matter and Pembina is writing today to kindly requests that the schedule set out in the above noted Procedural Order No. 2 be adjourned. Pembina requests this adjournment for the following reasons:

- 1) Pembina has been diligently working towards obtaining a Risk Assessment that will fully address all of the components of s. 7.1 and 7.2 of CSA Z341. In this regard, Pembina has requested that Stantec Consulting Ltd. ("Stantec") conduct modeling to assess the consequences and incremental risk associated with proposed additional hydrocarbon storage at the facility; and
- 2) Pembina has engaged the original authors of the geomechanical assessments (the "Assessments") with a view to obtaining a qualified opinion as to the current adequacy of the Assessments. With respect to providing copies of the Assessments, it was brought to our attention by a third party following filing of the Application that the Assessments were obtained by Pembina's predecessor in interest, Dow Chemical Canada Inc. ("Dow"), pursuant to an agreement between Dow and such third party which has operations in the areas surrounding the facility. The agreement provides that Pembina cannot provide the Assessments to a third party without the prior written permission of the third party, among other conditions. Pembina has engaged in discussions with the third party to obtain the required consent to disclose and discussions regarding the disclosure of the Assessments are ongoing. Although we are unable to provide a copy of the Assessments at this time, Pembina continues to make every effort to obtain the required consent with the intention to providing the Ministry with a copy of the Assessments as soon as we are able.

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Pembina is committed to maintaining a positive relationship with the Ontario Energy Board and Ontario Ministry of Natural Resources and Forestry of through direct and transparent communication. As part of our ongoing commitment to this engagement, Pembina will endeavor to complete the items listed above as soon as we are able. At this time, Pembina requests the following:

- The addition of the Risk Assessment and Geomechanical Assessments evidence as listed above being filed by Pembina by July 27, 2015;
- Item 4<sup>1</sup> anyone that requires information and material related to any intervenor evidence, that is in addition to the evidence filed and is relevant to the hearing, shall request it by written interrogatories filed with the OEB and delivered to Pembina and all other parties being adjourned to **August 3**, **2015**.
- Item 5 responses to the interrogatories on the intervenor evidence shall be filed with the OEB and delivered to Pembina all other parties being adjourned to **August 10, 2015**.
- Item 6 unless the OEB orders otherwise, intervenors and OEB staff may file any written submission with the Board and copy Pembina being adjourned to **August 24, 2015**.
- Item 7 unless the OEB orders otherwise, Pembina may file a written reply submission with the OEB being adjourned to August 31, 2015.

If you require additional information or have any questions with regards to this filing, please contact Melissa Lundy, Regulatory Advisor at (403) 231-3153 or by email at <a href="mailto:mlundy@pembina.com">mlundy@pembina.com</a>.

Sincerely,

Original Signed By

Melissa Lundy Regulatory Advisor

cc: List of Intervenors in EB-2015-0032

<sup>&</sup>lt;sup>1</sup> All items as shown in Procedural Order No. 2