Ministry of Natural Resources and Forestry

Legal Services Branch 3rd floor, Room 3420 99 Wellesley Street West Toronto ON M7A 1W3 Fax: (416)314-2030

Direct Line (416) 314-2007

e-mail: demetrius.kappos@ontario.ca

Direct Line (416) 314-2007

VIA e-mail (boardsec@ontarioenergyboard.ca) and courier (2 copies to Board)

Ministère des Richesses naturelles

Division des services juridiques

3e étage, bureau 3420

99, rue Wellesley ouest

Toronto ON M7A 1W3

Téléc: (416)314-2030

et des Forêts

June 23, 2017

Our File No. 948-22-0018

> Ontario

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

RE: Union Gas Limited ("Union")

Application for 2017 Terminus Well Replacement Project Board File No. EB-2017-0162
MNRF Interrogatory

Dear Ms. Walli:

In accordance with the Board's Procedural Order No. 1 dated June 8, 2017, attached you will find the written interrogatory of the Ministry of Natural Resources and Forestry ("MNRF"):

Yours truly,

Demetrius Kappos

Counsel

Legal Services Branch

c: The Applicant and Intervenor representatives listed below (by email); Jug Manocha (MNRF)

Union Gas Limited (Applicant)

Bill Wachsmuth Sr. Administrator, Regulatory Projects Union Gas Limited 50 Keil Drive North P.O. Box 2001 Chatham, ON N7M 5M1 Tel: 519-436-5457

Fax: 519-436-4641

bwachsmuth@uniongas.com

Enbridge Gas Distribution Inc. (Intervenor)

Andrew Mandyam Director Enbridge Gas Distribution Inc. 500 Consumers Rd. Toronto ON M2J 1P8 Tel: 416-495-5499 Fax: 416-495-6072 egdregulatoryproceedings@enbridge.com

Tania Persad Senior Legal Counsel Enbridge Gas Distribution Inc. 500 Consumers Road Willowdale ON M2J 1P8 Tel: 416-495-5891 Fax: 416-495-5994

tania.persad@enbridge.com

Union Gas Limited Application for 2017 Terminus Well Replacement Project Board File No. EB-2017-0162

Interrogatory of the Ministry of Natural Resources and Forestry

- 1. In the Applicant's pre-filed evidence, **Schedule 2** entitled "Terminus Pool: Depth to Crest and Guelph Structure Map" identifies a number of wells in and near the subject storage pool. At **Schedule 4**, page 7, under the heading "Assessment of Neighbouring Activities", the application identifies that:
 - There are 6 wells within 1 km of the base of the Terminus Pool.
 - There are 3 natural gas storage reservoirs and 8 oil and gas production reservoirs.
 - 10 wells penetrate the storage zone; 8 wells are part of pool operations, 2 are abandoned.

And further concludes:

- Union does not expect any impact from existing operations.

<u>Interrogatory:</u> Please provide details as to the potential risks that were considered and a summary of the analysis that was conducted to lead to the above-noted conclusion.