

**Ministry of Natural Resources  
and Forestry**

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

March 5, 2018

Our File No. 948-22-0019

Kristen Walli  
Board Secretary  
Ontario Energy Board  
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**RE: Application by Union Gas Limited ("Union")**

- **Board File Number: EB-2017-0363**
- **Application for a permit to drill 3 new hydrocarbon injection/withdrawal wells and for approval to construct natural gas pipelines in the Bickford Designated Gas Storage Pool**

Dear Madam,

In accordance with the Board's directions, please find attached the Ministry of Natural Resources and Forestry's submission with respect to the above-referenced application.

Yours truly,

Demetrius Kappos  
Counsel  
Legal Services Branch

Encl.

- c. Jug Manocha (MNRF)
- c. The Applicant and Intervenor

**UNION GAS LIMITED**  
**2018 STORAGE ENHANCEMENT PROJECT**  
**BICKFORD POOL**  
**EB-2017-0363**

**Written Submission of the Ministry of  
Natural Resources and Forestry**

**Introduction:**

Union Gas Limited ("Union") filed an application dated December 7, 2017 ("the Application") with the Ministry of Natural Resources and Forestry ("MNRF") pursuant to the *Oil, Gas and Salt Resources Act* ("OGSRA") for three well drilling licences in the Bickford Designated Gas Storage Area ("Bickford Pool"):

U001560 Union Bickford 37, Sombra 7-6-XII  
U001561 Union Bickford 38, Sombra 5-6-XII  
U001562 Union Bickford 39, Sombra 5-6-XII

On December 8, 2017, MNRF referred the Application to the Ontario Energy Board ("OEB") pursuant to s. 40 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 ("OEB Act") for a report to the Minister.

Union has also applied under s. 90 of the OEB Act for leave to construct approximately 530 metres of 12 inch diameter pipeline in the Bickford Pool.

The OEB initiated this proceeding subsequent to the MNRF referral.

Further to Interrogatories and responses to Interrogatories, the MNRF is hereby providing a Written Submission.

**Analysis:**

MNRF Petroleum Operations Section has reviewed Union's Application, Board Staff's Interrogatories (including the proposed conditions of approval) and Union's Response to Interrogatories.

Based on the Application and this further information provided, MNRF is satisfied that the Application meets CSA Z341.1-14, subject to the Board Staff's proposed conditions of approval.

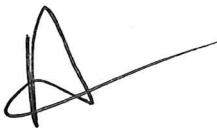
**Conclusion and Relief Requested:**

MNRF can support Union's 2018 Bickford Storage Enhancement Project, subject to the Board Staff's proposed conditions of approval.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

DATED AT Toronto, this the 5<sup>th</sup> day of March, 2018.

Yours truly,



Demetrius Kappos  
Counsel  
Legal Services Branch  
Ministry of Natural Resources and Forestry

- c. Jug Manocha (MNRF)
- c. The Applicant and Intervenor representatives listed below (by e-mail)

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