

Ministry of Natural Resources
and Forestry

Ministère des Richesses naturelles
et des Forêts

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

March 16, 2018

Our File No. 948-22-0020

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

**RE: Sarnia Airport Storage Pool Limited Partnership
Sarnia Airport Storage Pool – Increase in Maximum Operating Pressure
Board File No. EB-2017-0362
MNRF Interrogatory**

Dear Ms. Walli:

In accordance with the Board's Procedural Order No. 1 dated March 8, 2018, attached you will find the written interrogatories of the Ministry of Natural Resources and Forestry ("MNRF").

Yours truly,

A handwritten signature in dark ink, appearing to read "Demetrius Kappos", with a long, sweeping horizontal line extending to the right.

Demetrius Kappos
Counsel
Legal Services Branch

c: The Applicant representative listed below (by email); J. Manocha (MNRF)

Union Gas Limited (Applicant)

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Sarnia Airport Storage Pool Limited Partnership

Sarnia Airport Storage Pool – Increase in Maximum Operating Pressure

Board File No. EB-2017-0362

Interrogatories of the Ministry of Natural Resources and Forestry

1. In the Applicant's **pre-filed evidence, at page 1, paragraph 3, at page 3, paragraphs 12 and 13, and at Schedule 5, page 3**, references various entities: Sarnia Airport Storage Pool LP ("SASP LP"), Market Hub Partners Management Inc. ("MHP"), AltaGas Ltd. ("Alta Gas") and Union Gas Limited.

Interrogatories:

- 1) Please describe the relationship between these entities.
 - 2) Please clarify who is(are) the operator(s) of the existing operation approved under EB-2008-0002 and whether any change to this relationship is proposed for the operation should it be authorized for storage at a higher gradient. Please also identify which entity is the primary operator of the existing operation and of the proposed operation.
 - 3) Please clarify who would provide the lead in case of an emergency or an unexpected adverse event. Is this set out in the emergency plan?
2. In the Applicant's **pre-filed evidence at page 6, paragraph 26 and at Schedule 6, page 3**, the Applicant describes hazards and operability ("HAZOP") analysis.

Interrogatories:

- 1) Please advise whether in formulating the risk assessment any unique risks were identified that are associated with the location of the storage reservoir being below an active airport? If so, what consideration was given to any such unique risks?

- 2) Are procedures and protocols in place to address any such unique risks and have those protocols been exercised? If so, what is the result of the exercise?
 - 3) Has the project's emergency plan been updated since the approval of EB-2008-0002? If yes, please summarize those update(s).
 - 4) When was the last emergency plan exercise carried out? Please offer a summary of the results of that exercise.
3. In the Applicant's **Application at page 1, paragraph 4**, a request is made to add the following condition to the approval that was granted in the EB-2008-0002 proceeding:

Sarnia Airport Storage Pool Limited Partnership shall not operate the storage pool above a pressure representing a pressure gradient of 17.2 kPa/m (0.76 psi/f) of depth without leave of the Board. Sarnia Airport Storage Pool Limited Partnership shall provide summaries of an engineering study and geological study in support of any leave application and a formal confirmation from the Ministry of Natural Resources and Forestry that operating the pool at the increased operating pressure complies with the requirements of the CSA Z341 standard.

In the Applicant's **pre-filed evidence, at page 1, paragraph 5**, it is stated that an engineering study completed by Geofirma confirms that the maximum safe operating pressure "exceeds 17.2 kPa/m (0.76 psi/ft) for the Sarnia Airport Pool".

Interrogatories:

- 1) Are there any plans to further increase to a higher gradient beyond 0.76 psi/ft?
 - 2) What is the rationale for an abridged process for any future gradient increase request, as set out in the condition request (i.e., a process requiring the involvement only of MNR and the OEB)?
4. In the Applicant's **pre-filed evidence at pages 6 and 7, paragraph 29**, the Applicant identifies some works that are acknowledged to be necessary in advance of the increased gradient proposed.

Interrogatories:

- 1) Please advise whether the operator intends to submit to the MNRF a Drilling and Completion Report (Form 7) upon completion of the wellhead assembly replacement.
 - 2) A well is identified for a workover to be completed to replace a portion of the production casing. Please identify the well licence number, specify the nature of the problem with its casing as it exists and provide details regarding the repair proposal.
 - 3) Please confirm that these activities will be performed in accordance with the CSA Z-341 requirements.
5. In the Applicant's **pre-filed evidence (dated December 7, 2017) at page 7, paragraphs 30 and 32**, the Applicant summarizes consultation efforts made and indicates there were no responses.

Interrogatories:

- 1) Please indicate whether any inquiries or comments were submitted to the Applicant in response to consultation and after the timeframe addressed in paragraphs 30 and 32.
- 2) If any inquiries or comments were submitted to the Applicant, please identify and summarize them.