



Joel Denomy
Technical Manager,
Regulatory Applications
Regulatory Affairs

Tel 416 495 5499
joel.denomy@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

VIA RESS, EMAIL AND COURIER

January 24, 2019

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

**Re: Enbridge Gas Inc.
Application to Drill Wells in Dow Designated Storage Area
OEB File Number EB-2017-0354**

On October 26, 2018 Enbridge Gas Inc., then Enbridge Gas Distribution Inc. (“Enbridge”) filed an updated application with the Ontario Energy Board (the “Board”) regarding the drilling of four wells in the Dow Moore Designated Storage Area (the “Application”). The Application did not include an opinion from the Ministry of Energy, Northern Development and Mines (“MOENDM”) as to the adequacy of indigenous consultation for the TD27 well. Enbridge is providing this evidence update to include the opinion letter from the MOENDM regarding the TD 27 well. Specifics related to this evidence update are set out in the table below.

Exhibit	Title	Update
G-2-1	Indigenous Consultation	Updated to include additional wording at page 2 of 5. Updated to include additional attachment, Attachment 3.

Enbridge also indicated in the Application, at Exhibit F, Tab 1, Schedule 1, that it is required to contact the Township of St. Clair to acquire all necessary road permits. Enbridge can confirm that it has acquired all necessary road permits from the Township of St. Clair.

Sincerely,

[original signed]

Joel Denomy
Technical Manager, Regulatory Applications, Regulatory Affairs

INDIGENOUS¹ CONSULTATION

1. Enbridge Gas Distribution Inc. (“Enbridge”) is committed to creating processes that support meaningful engagement with potentially affected Indigenous groups (First Nations and Métis). Enbridge works to build an understanding of project related interests, ensure regulatory requirements are met, mitigate or avoid project-related impacts on Aboriginal interests including rights, and provide mutually beneficial opportunities where possible.
2. Pursuant to the Ontario Energy Board’s *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition, 2016* (the “Guidelines”), Enbridge provided the Ontario Ministry of Energy Northern Development and Mines (the “MOENDM”), formerly the Ministry of Energy, with a project description for the TD27 Dow Moore Well Drilling Project (the “Project”) on May 31, 2018. The Project description is set out at Attachment 1 to this Exhibit.
3. Subsequently, on September 10, 2018, Enbridge received a letter (“Delegation Letter”) from the MOENDM indicating that the MOENDM had delegated the procedural aspects of consultation to Enbridge for the Project. The Delegation Letter identified five Indigenous communities to be consulted with. A copy of the Delegation Letter is provided in Attachment 2 to this Exhibit.
4. On January 23, 2019 Enbridge received an opinion letter from the MOENDM regarding the adequacy of indigenous consultation undertaken for the Project. In that letter the MEONDM indicated that it is of the opinion that the procedural

¹ Enbridge has used the terms “Aboriginal” and “Indigenous” interchangeably in its application. “Indigenous” has the meaning assigned by the definition “aboriginal peoples of Canada” in subsection 35(2) of the *Constitution Act, 1982*.

aspects of consultation undertaken by Enbridge is satisfactory. A copy of the MOENDM's opinion letter can be found at Attachment 3 to this Exhibit.

5. Information gathered during the course of Enbridge's engagement with Indigenous groups was incorporated into the accompanying Stage 1 and Stage 2 Archaeological Assessment and Environmental Screening Reports set out in the C series of Exhibits. This work was completed under the auspices of the Guidelines which include duty to consult requirements for hydrocarbon facility proponents.
6. Exhibit G, Tab 2, Schedule 2 contains a summary of Enbridge's Indigenous consultation activities for the Project. Exhibit G, Tab 2, Schedule 3 contains the Indigenous consultation matrix (and associated attachments) for the Project.
7. The information presented in the aforementioned Exhibits reflects Enbridge's Indigenous engagement activities for the Project up to and including October 26, 2018, however, Enbridge will continue to engage during the regulatory process and throughout the life of the Project.

Aboriginal Engagement Program Objectives

8. The design of the Aboriginal engagement program was based on adherence to the Guidelines and *Enbridge's Indigenous Peoples Policy* and principles as follows:
 - Enbridge has instituted a company-wide *Indigenous Peoples Policy* ("Policy") (set out in Exhibit G, Tab 1, Schedule 1, Attachment 3). The Policy lays out key principles for establishing relationships with Indigenous groups, which includes, among other things, respect for traditional ways and land, heritage sites, the environment and traditional knowledge.
 - Enbridge has established meaningful relationships, provided timely exchanges of information, understands and addresses Indigenous Project-specific

concerns, and ensures ongoing dialogue about its projects, their potential implications and benefits.

- Enbridge aligns its interests with those of Indigenous communities through meaningful, direct Indigenous economic activity in projects corresponding to community capacity and project needs, where possible.
- The Indigenous engagement program for the Project recognizes the rights of Indigenous groups and assists Enbridge in engaging in meaningful dialogue with potentially affected Indigenous groups about the Project. It also assists Enbridge in meeting the procedural aspects of consultation that may be required by the Crown and the Guidelines.

Overview of Aboriginal Engagement Program Activities

9. Enbridge conducts its Indigenous consultation generally through phone calls, in-person meetings, Project mail-outs, open houses and email communications. During these engagement activities, Enbridge representatives will provide an overview of the Project, respond to questions and concerns, and address any interests or concerns expressed by Indigenous communities to appropriately mitigate any project-related impacts. In order to accurately document Indigenous engagement activities and ensure follow-up, applicable supporting documents are tracked using a database.

Ongoing Aboriginal Engagement Activities

10. Enbridge will continue to engage with all identified Aboriginal groups in open and transparent dialogue concerning the Project and will continue to offer meaningful opportunities to engage with each Aboriginal group for the purposes of exchanging information respecting the Project, responding to inquiries, hearing and responding to any interests and concerns that may arise, including those related to potential economic and business opportunities. Enbridge plans to continue its active

involvement in community events and initiatives in an effort to maintain long-term relationships with Aboriginal groups.

11. The Aboriginal engagement program will continue to involve a number of activities including mailing out letters and Project information materials, face-to-face meetings and ongoing follow-up activities to ensure Enbridge addresses any identified interests or concerns related to the Project. Additional engagement activities may include:

- Continuing engagement throughout the regulatory process, as well as through the construction and operations phases of the Project;
- Providing Aboriginal groups with Project information in a timely, ongoing and respectful manner so they can consider such information in determining how their interests, including rights, may be impacted by the Project;
- Developing engagement protocol principles with potentially affected Aboriginal groups that are commensurate with the scope and potential impacts of the Project for each Aboriginal community;
- Assessing the capacity of each Aboriginal group to participate meaningfully in the engagement process for the Project, including the need for financial, training and professional support;
- Identifying any Aboriginal groups who may be currently carrying out traditional land and resource use activities within the immediate Project area;
- Learning about and, to the extent feasible, mitigating or avoiding potential Project-related impacts on traditional land and resource use;
- Providing opportunities to Aboriginal groups to identify their interests including rights in the Project and any potential Project-related impacts;
- Indicating how information and concerns of Aboriginal groups have been considered and taken into account by Enbridge in the design and planning of the Project;

- Seeking guidance from applicable government agencies to ensure that Enbridge understands and meets the requirements of these agencies and departments with respect to engaging with Aboriginal groups;
- Engaging applicable government agencies in the Aboriginal consultation process and providing information related to Enbridge's engagement activities and, with the consent of an Aboriginal group, any specific interests and concerns brought forth by the group;
- Increasing knowledge of the potential environmental effects of the Project by incorporating existing and available traditional environmental knowledge, where appropriate, in developing mitigation or avoidance measures;
- Disseminating the results of the environmental assessment process;
- Avoiding, reducing or mitigating, as appropriate, potential adverse effects or impacts of the Project on Aboriginal interests including rights; and
- Meeting or exceeding all related legislative and government policy requirements in respect of consultation policies and associated guidelines.

12. Enbridge will continue to actively engage all identified Indigenous groups in meaningful ongoing dialogue concerning the Project and endeavor to meet with each First Nation, provided they are willing, for the purpose of exchanging information regarding the Project and to respond to inquiries in a timely manner. Enbridge will hear and address concerns as is feasible and seek information on the exercise of, and potential impacts to, Aboriginal and Treaty rights, traditional use in the Project area and how any potential Project-related impacts can be mitigated.

Ministry of Energy, Northern
Development and Mines

Ministère de l'Énergie, du
Développement du Nord et des
Mines

77 Grenville Street
6th Floor
Toronto ON M7A 2C1

77, rue Grenville
6^e étage
Toronto ON M7A 2C1

Tel: (416) 325-6544

Tél: (416) 325-6544



Indigenous Energy Policy

VIA EMAIL

January 23, 2019

Joel Denomy
Technical Manager, Regulatory Applications
Enbridge Gas Distribution
500 Consumers Road
North York, ON M2J 1P8

Re: Dow Moore Well Drilling Project (TD27) – Consultation Sufficiency Opinion

Dear Mr. Denomy,

The Ontario Ministry of the Energy, Northern Development and Mines has completed its review of Enbridge's Indigenous consultation report for the Dow Moore Well Drilling Project (TD27). This letter is to notify you that based on the information provided and through contacting the communities directly, the Ministry is of the opinion that the procedural aspects of consultation undertaken by Enbridge to date for the purposes of the Ontario Energy Board's Leave to Construct for the Dow Moore Well Drilling Project (TD27) is satisfactory.

It is expected that Enbridge will continue its consultation activities with the communities throughout the life of the project, and that Enbridge will notify the Ministry should any additional rights-based concerns/issues arise.

If you have any questions about this letter or require any additional information, please contact Chloë Lazakis at 416-327-2116 or chloe.lazakis@ontario.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon McCabe".

Shannon McCabe
A/Manager
Indigenous Energy Policy

c: Ontario Energy Board
Ontario Pipeline Coordinating Committee
Sonia Fazari, Enbridge