

Enbridge Gas Inc.
Application for Increase in Maximum Operating Pressure
Board File No. EB-2020-0074

Interrogatories of the Ministry of Natural Resources and Forestry

1. In the Applicant's **pre-filed evidence, at page 4, item 2**, the Applicant has indicated that they wish to increase delta pressuring to a max of 17.2 kPa/m (0.76 psi/ft) which is allowed in CSA Z341.1–18.

Interrogatory:

- a) Please confirm that the Applicant intends to follow the current CSA Z341.1–18 standard and going forward intends to adopt any future revisions to CSA Z341.1.

2. In the Applicant's **pre-filed evidence, at page 4, item 3** the Applicant has indicated that they will install new well heads and emergency shut down ("ESD") valves. At **page 11, item 17**, the Applicant indicates it intends to install ESD valves on each natural gas storage well in the subject pools.

Interrogatories:

- a) Why the installation of these new works?
- b) Was it further to a risk assessment related to same?
- c) Does the Applicant intend to install ESD valves on all storage injection/withdrawal wells for all future projects?
- d) Will a new Form 7 (Well Completion) from the Provincial Standards under the *Oil, Gas and Salt Resources Act* be filed with the Ministry of Natural Resources and Forestry with respect to these works?

3. In the Applicant's **pre-filed evidence, at page 11, item 18**, the Applicant indicates that all above-ground well and piping components have been reviewed to ensure compliance with "all codes and standards" at the increased operating pressure.

Interrogatory:

a) Please specify the codes and standards that are referred to above.

4. In the Applicant's **pre-filed evidence, at page 5, item 5** a request is made to include the following as a condition of approval to the application:

Enbridge Gas shall not operate the storage pool above a pressure representing a pressure gradient of 17.2 kPa/m (0.76 psi/ft) of depth without leave of the OEB. Enbridge Gas shall provide summaries of an engineering study and geological study in support of any leave applications 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.

Further, **at pages 266, 270 and 274**, in model evaluations concerning each of the three reservoirs pressure increases were considered likely to be acceptable at the 0.8 psi/ft threshold.

Interrogatories:

- a) Are there any plans to further increase to a higher gradient than 0.76 psi/ft?
- b) Does the proposed condition above intend that full application to the OEB be made for approval of any future increased gradient beyond 0.76 psi/ft, involving the potential for a hearing with intervenors?
- c) Does the applicant confirm it is its responsibility to comply with the requirements of the CSA Z341 standard?

5. In the Applicant's **pre-filed evidence, at pages 264, 268 and 272**, the Applicant indicates that the "What If" analyses conducted for each of the pools were done within the scope of the CSA Z341.1-18 regulation. In the Applicant's **prefiled evidence, at pages 263 and 271**: Regarding the assessment of neighbouring activities, the Applicant concludes that no impact to the integrity of the storage facility or storage zone have been caused by neighbouring wells and subsurface activities.

Interrogatories:

- a) Was any consideration given to other regulatory public safety and environmental requirements (e.g., under the *Occupational Health and Safety Act* or under the *Environmental Protection Act*)?
- b) Has the proposed increase in pressure:
 - (i) been considered from a risk perspective with respect to the impacts of uncontrolled surface or subsurface gas release to the environment and public health and safety?
 - (ii) involved an assessment of neighbouring activities?
 - (iii) considered potential impacts from potential changes to activities in surrounding storage pools?

6. In the Applicant's **pre-filed evidence, at page 13, item 25; page 14, item 32; page 16, item 39**: Regarding caprock integrity, reference is made to Geofirma Engineering studies that "incorporated data from geo-mechanical and regional *in situ* tests completed on the reservoir and caprock formations".

Interrogatory:

- a) Please specify the studies and tests that are referred to above.

7. In the Applicant's **pre-filed evidence, at page 75, item 2.2.2; Letter to the Ministry of the Environment, Conservation and Parks ("MECP") in Appendix (at page 96)**: Regarding the Snake Mitigation Plan for Wilkesport and Coveny Pools, the letter to MECP dated December 3, 2019 outlines the proposed Snake Mitigation Plan and asks for MECP "confirmation" as to appropriateness.

Interrogatory:

- a) What, if any, response has been received from MECP further to the December 3, 2019 letter?

8. In the Applicant's **pre-filed evidence, at page 243, item 4**: Regarding the well work schedule, there is an indication that "the well work must take place between April and September 2019 to ensure that there will be no disruption to service to ensure that the pressure will be suitable to safely complete the well work."

Interrogatories:

- a) Please confirm the typo -- we assume the reference to "2019" should read "2020".
- b) Please confirm what impact the COVID-19 pandemic, including the Provincial Declaration of Emergency (O.Reg. 50/20) and related Emergency Orders under the *Emergency Management and Civil Protection Act*, are expected to have on the timing referred to above for the accomplishment of these or other work-related steps related to this proposal.

9. In the Applicant's **prefiled evidence**, there doesn't appear to be any reference to an updated Emergency Response Plan.

Interrogatories:

- a) Have the ERP(s) that exist for the subject pools been reviewed and updated for the purposes of this application?
- b) If yes, has this update included a consideration of provisions addressing notification of neighbours, the public and public agencies in the event of an emergency (e.g., has contact information been updated)?