

**Ministry of Natural Resources
and Forestry**

Legal Services Branch
3rd floor, Room 3420
99 Wellesley Street West
Toronto ON M7A 1W3
Tel: (416) 314-2002

**Ministère des Richesses naturelles
et des Forêts**

Division des services juridiques
3^e étage, bureau 3420
99, rue Wellesley ouest
Toronto ON M7A 1W3
Tél: (416) 314-2002



Direct Line (416) 254-7258

E-mail: demetrius.kappos@ontario.ca

Via e-mail (boardsec@ontarioenergyboard.ca) and RESS filing

May 28, 2020

Our File No.

Christine Long
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
E-mail: boardsec@ontarioenergyboard.ca

**Re: Enbridge Gas Inc.
Application for Increase in Maximum Operating Pressure
Board File Number EB-2020-0074**

Dear Madam,

Please find enclosed the Written Submission of the Ministry of Natural Resources and Forestry.

Yours truly,

Demetrius Kappos
Counsel
Legal Services Branch

c. Alain Belanger, Petroleum Resources Centre, MNR (via e-mail)
c. Stephanie Allman, Regulatory Coordinator, Enbridge Gas Inc. (via e-mail)

Enbridge Gas Inc.

Application for approval to increase the maximum operating pressure of the Black Creek, Coveny and Wilkesport natural gas storage pools located near Sarnia, Ontario

Board File Number EB-2020-0074

Written Submission of the Ministry of Natural Resources and Forestry

Introduction

Enbridge Gas Inc. ("Enbridge") applied on February 7, 2020 to the Ontario Energy Board ("OEB") to increase pressures at three natural gas storage pools (Black Creek, Coveny and Wilkesport), each of which is within a designated storage area as defined in the *Ontario Energy Board Act, 1998* and each of which is part of Enbridge's Tecumseh storage operations.

The application is for authorization to increase the maximum operating pressure in each pool to a maximum pressure gradient of 17.2 kPa/m (0.76 psi/ft) from the current maximum of 15.8 kPa/m (0.7 psi/ft).

The project will include the installation of wellhead upgrades and emergency shutdown valves on each of the natural gas storage wells within each designated storage area.

On March 12, 2020 the OEB formally initiated this proceeding through a Notice of Public Hearing.

On March 25, 2020 the MNRF requested Intervenor status and was granted status in the OEB Procedural Order dated April 9, 2020.

Further to interrogatories of the MNRF (April 24, 2020) and OEB Staff (April 24, 2020) and Enbridge's responses to the interrogatories (May 11, 2020), here now are the written submissions of the MNRF.

Analysis

MNRF has reviewed Enbridge's application as filed with the OEB. MNRF has not reviewed the three reports identified in Exhibit I to Enbridge's response to OEB Staff Interrogatories (i.e., Engineering Assessments by Geofirma Engineering Ltd.; Assessment of Neighbouring Activities; Analysis of Hazards and Operability).

MNRF is satisfied that Enbridge has provided a complete response to MNRF's interrogatories and to the OEB Staff interrogatories about which MNRF has a particular interest, being all of OEB Staff's interrogatories with the exception of Exhibit I, OEB Staff 1.

Some of the MNRF and OEB Staff interrogatories concern how authorization for any future increased maximum pressure gradient would be sought. MNRF was concerned at the interrogatory stage that what was being requested by Enbridge was a truncated process for any future change to the maximum pressure gradient. MNRF can support the proposed clarified revised wording of the draft condition in Enbridge's response found at Exhibit I, OEB Staff 2:

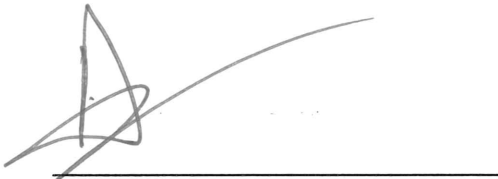
Enbridge Gas shall not operate the storage pool above a pressure representing a pressure gradient of 17.2 kPa/m (0.76 psi/ft) of depth without leave of the OEB.

MNRF reminds Enbridge that, as the operator, Enbridge bears the responsibility for ensuring that all safety and environmental issues are addressed and to ensure compliance with the *Oil, Gas and Salt Resources Act*, O.Reg. 245/97 and CSA Z341: Storage of Hydrocarbons in Underground Formations.

Conclusion and Relief Requested

In conclusion, MNRF has no objection to approval of the application as proposed.

All of which is respectfully submitted.

A handwritten signature in dark ink, appearing to be 'Demetrius Kappos', written over a horizontal line.

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