

Enbridge Gas Inc.
Application for Well Licences for Kimball-Colinville and Payne DSAs
Board File No. EB-2020-0105

Interrogatories of the Ministry of Natural Resources and Forestry

1. In the Applicant's **pre-filed evidence, at page 5**, the Applicant indicates that it has applied to MNRF for "a licence to drill stratigraphic test well".

Interrogatory:

a) Is this reference to a "stratigraphic test well" a typo or remnant from another document, and is there any relevance to this project?

2. In the Applicant's **pre-filed evidence, at page 10, item 9 and at page 240, item 4**, the Applicant has indicated that it intends to conduct the well drilling operations in June/July 2020, when the reservoirs will be at minimum pressures (below 3,500 kPa).

Interrogatories:

- a) Please confirm this timing estimate.
- b) How, if at all, has the COVID-19 pandemic and emergency orders issued in light of the pandemic affected this timing estimate?

3. In the Applicant's **pre-filed evidence, at page 23, item 5.2**, the Applicant has referred to both rotary and potentially cable tool drilling being used as part of the project. In the Applicant's **pre-filed evidence, at pages 250 and 280** (in the licence applications

for the wells) and **on pages 266 and 290** (under the drilling programs), reference is made only to the construction of surface holes using either type of drilling.

Interrogatories:

- a) Are there any contingency plans to drill the entire vertical well (UP 24), and vertical section of the horizontal well (TKC 67H), using cable tool drilling?
- b) If “yes” to a), what would be the impact to project duration?
- c) Please confirm that Applicant understands that any changes to the proposed drilling programs would require subsequent review and approval under the well licences by MNRF after this hearing?

4. In the Applicant’s **pre-filed evidence, at pages 27-28**, the Applicant has indicated that it has retained a consultant hydrogeologist who will conduct a standard water well monitoring program.

Interrogatories:

- a) To what properties and how far from the project sites will the water well monitoring be offered?
- b) What was the rationale for selecting the water wells to be monitored?

5. In the Applicant’s **pre-filed evidence, at pages 22 and 33, item f)**, the Applicant has indicated that Enbridge Gas will provide the adjacent landowners with the telephone numbers of Enbridge personnel and that a Landowner Relations Program will be established to track complaints during construction. In the Applicant’s **pre-filed evidence, at page 58 (in the Environmental Screening Report)**, the consultants indicated that “it is recommended that notification letters are delivered to house(s) (sic) within one (1) km of the Study Area that have active wells. The letters should describe a workplan for well monitoring, including testing for standard parameters and methane.” **In the Applicant’s pre-filed evidence, at page 57 (in the ESR)**, the consultants

convey that MECP records indicate that there are four (4) water wells within 1km of the Study Area at TKC 67H and seven (7) water wells within 1km of the Study Area at UP 24.

Interrogatories:

- a) Who will administer the “Landowner Relations Program” and what will it entail?
- b) Will the Applicant ensure that the recommendations in the ESR described above regarding notification letters are followed?
- c) Will all persons served with notification letters be part of the “Landowner Relations Program”?

6. In the Applicant’s **pre-filed evidence, at page 119**, the Applicant has described the land access/use situation regarding the two well sites. The Applicant advises that it owns the lands on which TKC 67H is to be drilled and it leases the lands on which UP 24 is to be drilled. In the Applicant’s **pre-filed evidence, at page 241, item 8**, the Applicant advises that the lease agreement pertaining to the UP 24 lands “grants Enbridge the right to drill and access the well.” However, in the Applicant’s **pre-filed evidence, at page 119**, the Applicant has also indicated that the third-party farmer from whom the UP 24 lands are leased has been provided with a Letter of Acknowledgement and a Pipeline Easement Agreement and that “negotiations with the third-party farmer are on-going. Enbridge Gas expects to execute the aforementioned agreements with the third-party farmer in April 2020.”

Interrogatory:

- a) Please provide an update as to the current status of the negotiations with the third-party farmer. Has the Pipeline Easement Agreement been signed by the third-party farmer?

7. The Applicant's **pre-filed evidence, at pages 180 – 187** contains a letter from the Ministry of Energy, Northern Development and Mines (MENDM) instructing the Applicant to consult with six identified Indigenous groups. In the Applicant's **pre-filed evidence, at page 119, item 5**, the Applicant has indicated that the Indigenous Consultation Report was provided to MENDM on April 9, 2020, the same date as the filing of the pre-filed evidence with the OEB. As of that date, MENDM hadn't yet provided its decision as to whether Enbridge's Indigenous consultation for the project has been sufficient.

Interrogatory:

- a) Please provide an update as to the current status of MENDM communication with respect to sufficiency of Enbridge's Indigenous consultation for the project.

8. In the Applicant's **pre-filed evidence, at pages 240-242**, the Applicant has described its Risk Assessment. In the Applicant's **pre-filed evidence, at pages 244-246**, the Applicant has described its Assessment of Neighboring Activities.

Interrogatories:

- a) Was any consideration given to other regulatory public safety and environmental requirements, for example, under the *Occupational Health and Safety Act* or under the *Environmental Protection Act*?
- b) Please advise if any unique risks related to this project were identified and if yes, what considerations were given to such unique risks?
- c) Have all action items arising from the "What-If?" analysis been implemented as recommended?
- d) Have the current Emergency Response Plans for the two storage pools in question been reviewed and updated for the purposes of this application? If yes, has this update included a consideration of provisions addressing the notification

of neighbours, the public and agencies in the event of an emergency (e.g., has contact information been updated)?

- e) When was the last emergency response exercise the storage pools in question carried out?
- f) Please confirm whether risks pertaining to any improperly plugged and abandoned wells in the study area have been addressed.

9. In the Applicant's **pre-filed evidence, at page 243, item 1** the Applicant has indicated that it "understands that the Ontario Energy Board (Board) will require Enbridge Gas to conform to CSA Z341 'Storage of Hydrocarbons in Underground Storage Formations' (CSA Z341) to the satisfaction of the Ministry of Natural Resources and Forestry (MNRF)."

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.

10. In the Applicant's **pre-filed evidence, at pages 276 and 301**, the Applicant has described/depicted its wellheads for the two proposed wells, TKC 67H and UP 24.

Interrogatory:

Can the Applicant confirm whether Emergency Shutdown Valves will be installed for these wells?