

**Ministry of Natural Resources  
and Forestry**

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

August 4, 2020

Our File No. 948-22-0022

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

**Re: Enbridge Gas Inc.**  
**Application for Kimball-Colinville and Payne Well Drilling Project**  
**Board File Number EB-2020-0105**

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, MNRF (via e-mail)  
c. Stephanie Allman, Regulatory Coordinator, Enbridge Gas Inc. (via e-mail)

**Enbridge Gas Inc.**

**Application for approval to drill one horizontal natural gas storage well in the  
Kimball-Colinville Storage Pool and one vertical natural gas storage well in the  
Payne Storage Pool**

**Board File Number EB-2020-0105**

**Written Submission of the Ministry of Natural Resources and  
Forestry**

**Introduction**

Enbridge Gas Inc. (“Enbridge”, “applicant”) applied on March 13, 2020 to the Ministry of Natural Resources and Forestry (“MNRF”) for approvals for the drilling of a new horizontal natural gas storage well (TKC 67H) in the Kimball-Colinville Storage Pool and one vertical natural gas storage well (UP 24) in the Payne Storage Pool. Each of these pools constitute a designated storage area as defined in the *Ontario Energy Board Act*, 1998. On April 1, 2020, MNRF referred the two applications to the Ontario Energy Board (“OEB”).

Pursuant to s. 40 of the *Ontario Energy Board Act*, Enbridge seeks a favourable report from the Ontario Energy Board (“OEB”) to the MNRF.

Through Interrogatories, the applicant on June 29, 2020 has confirmed that the project will include the installation of emergency shutdown valves on each of the proposed natural gas storage wells.

On May 7, 2020 the OEB formally initiated this proceeding through a Notice of Public Hearing.

On May 22, 2020 the MNRF requested Intervenor status and was granted status in the OEB Procedural Order dated June 8, 2020.

Further to interrogatories dated June 18 – 21, 2020 of OEB Staff, the MNRF and the other Intervenor, Bryan Arnold and Doug Henderson, and further to Enbridge’s responses to the interrogatories (June 29, 2020), here now are the written submissions of the MNRF.

## **Analysis**

MNRF has reviewed Enbridge's application as filed with the OEB. Further, MNRF notes that, since the time of application, Enbridge has received a letter for opinion from the Ministry of Energy, Northern Development and Mines dated May 29, 2020 in which that Ministry confirms that it is satisfied with the procedural aspects of consultation with Indigenous communities.

MNRF is satisfied that Enbridge has provided a complete response to MNRF's interrogatories.

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.

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)". The MNRF is supportive of the inclusion of such a condition in the Conditions of Approval.

## **Conclusion and Relief Requested**

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

**All of which is respectfully submitted.**

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