

**Enbridge Gas Inc.**  
**2020/2021 Storage Enhancement Project**  
**Corunna, Ladysmith and Seckerton Storage Pools**  
**Board File No. EB-2020-0256**

**Interrogatories of the Ministry of Natural Resources and Forestry**

1. In the Applicant's **pre-filed evidence, at page 6, item 2, and at page 7, item 4 of updated evidence** the Applicant has indicated that they wish to increase delta pressuring to a maximum of 17.2 kPa/m (0.76 psi/ft) for the Corunna and Seckerton Pools, and 16.5 kPa/m (0.73 psi/ft) for the Ladysmith pool, both of which are allowed under 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 Z341.1-18.

2. In the Applicant's **pre-filed evidence, at page 7, item 5** the Applicant has indicated that they will install new well heads and emergency shut down ("ESD") valves. At **page 10, item 16, updated evidence**, the Applicant indicates it intends to install control valves capable of isolating the storage facility from the transmission pipeline at the Ladysmith Station. At **page 10, item 17, updated evidence**, the Applicant indicates it intends to install ESD valves on each natural gas storage well at the Corunna and Seckerton pools. At **pages 10-11, item 19, updated evidence**, the Applicant indicates it intends to install for the Corunna and Seckerton Pools:

A. New master valves on 18 wells;

- B. New wellheads on 18 wells; and
- C. The installation of ESD valves on 14 wells

**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 MNRF with respect to these works?

3. In the Applicant's **pre-filed evidence, at page 10, item 18, updated evidence**, the Applicant indicates that all above-ground well and piping components will be reviewed to ensure compliance with CSA Z662-15 and O.Reg. 210/01 made under the *Technical Standards and Safety Act, 2000* at the increased maximum operating pressure ("MOP").

**Interrogatories:**

- a) When will this work be completed?
- b) Please confirm that this work will be completed prior to operating at the new MOPs for each pool (Corunna, Seckerton, and Ladysmith).

4. In the Applicant's **pre-filed evidence, at pages 327,333 and 338**, concerning each of the three reservoirs, pressure increases in the MOP was considered up to a pressure gradient of 0.8 psi/ft.

**Interrogatories:**

- a) Are there any plans to further increase to a higher gradient than the 0.73 psi/ft for the Ladysmith Pool and 0.76 psi/ft for the Corunna and Seckerton Pools specifically requested in the application?
- b) Does the Applicant confirm that full application to the OEB would be made for approval of any future increased gradient beyond the 0.73 psi/ft and 0.76 psi/ft requested, involving the potential for a hearing with intervenors?
- c) Please confirm that the MOP shall not exceed 80% of the fracture pressure of the caprock formation in each of the three pools (Corunna, Seckerton, and Ladysmith).

5. In the Applicant's **pre-filed evidence, at pages 331, 336 and 341**, 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 329, 334 and 339**: 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, for 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) considered potential impacts from potential changes to activities in surrounding storage pools?

6. In the Applicant's **pre-filed evidence, at page 17, item 25; page 19, item 32; page 20, 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 provide a chronological list of the studies and tests that are referred to above.

7. In the Applicant's **pre-filed evidence at page 47, item 4**, the Applicant identifies in its discussion about the Environmental Report that "Aecom will conduct site investigations in fall 2020 to confirm habitat suitability for SAR species and based on these investigations, additional mitigation and avoidance measures may be developed and implemented to avoid impacts to SAR." Further, the Applicant also indicates that "if necessary, a permit or other authorization from the Ministry of the Environment, Conservation and Parks ("MECP") will be obtained to ensure compliance with the *Endangered Species Act, 2007*."

**Interrogatories:**

- a) Please update as to the described site investigations and their outcomes.
- b) Please update as to whether authorization from MECP is required, including whether MECP has offered comment in this regard.

8. At **page 56, item 8.2 of the Environmental Report**, there is a discussion about area water wells. It indicates:

*"If there is a potential for water wells to be affected by the Project, Enbridge should implement their standard water well monitoring program. An independent hydrologist shall be retained to assess the need for and to develop if necessary a*

*well monitoring program. Should a private domestic water well be affected by Project construction, a potable water supply should be provided, and the water should be repaired or restored as required.”*

**Interrogatories:**

- a) What assessment of area water wells was conducted? What were its conclusions?
- b) Will the recommendations set out above in s. 8.2 of the Environmental Report be implemented and if so, to what degree?

9. In the Applicant’s **pre-filed evidence, at page 48, item 8**, regarding archaeological assessment, the Applicant indicates that in response to the “high” likelihood of recovery of both First Nation and Euro-Canadian archaeological items through the proposed works a Stage 2 Archaeological Assessment will commence “in Fall 2020” and a clearance letter from clearance letter from the Ministry of Heritage, Sport, Tourism and Cultural Industries (“MHSTCI”) will be obtained prior to construction.

**Interrogatories:**

- a) Please offer an update regarding the Stage 2 Archaeological Assessment study.
- b) Is it still anticipated that a clearance letter will be obtained from MHSCI and if so, when?

10. In the Applicant’s **pre-filed evidence at page 50** there is description of discussions with Hyrdo One concerning potential impacts of the proposal to Hydro One infrastructure.

**Interrogatory:**

- a) What potential impacts are anticipated to Hydro One infrastructure

- b) Please summarize discussions with Hyrdo One and what was the outcome of those discussions?

11. In the Applicant's **pre-filed evidence at pages 74 – 75, items 15 – 20 and in its updated evidence, at pages 23 – 24, items 58 and 67**, the Applicant identifies requirements for land purchases and easements from private landowners to enable crossover pipeline installation and facility modification works.

**Interrogatories:**

- a) What is the status of the negotiations with the subject landowners that will be directly impacted by the project?
- b) In particular, please include a summary of the meeting with the Canadian Association of Energy and Pipeline Landowner Associations that was scheduled for November, 2020, and its outcome.

12. In the Applicant's **pre-filed evidence at page 178, item 4**, the Applicant indicates that its Indigenous Consultation Report was provided to the Ontario Ministry of Energy Northern Development and Mines ("MENDM") on November 13, 2020.

**Interrogatories:**

- a) Has an MENDM decision regarding the sufficiency of indigenous consultation been received yet? What was its decision?
- b) Has any indigenous feedback about the proposal been received since November 6, 2020? If so, please summarize.

13. In the Applicant's **pre-filed evidence, at pages 295 - 296, items 3, 6 and 7:** Regarding the well work schedule, there are indications as to construction windows for the project.

**Interrogatory:**

- a) Please confirm what impact the COVID-19 pandemic and associated government directives and orders are expected to have on the timing referred to above for the accomplishment of these or other work-related steps related to this proposal.

14. In the Applicant's **pre-filed evidence at page 14, item 14,** the Applicant indicates they are intending to update the Emergency Response Plan ("ERP") for each pool (Ladysmith, Corunna, Seckerton).

**Interrogatories:**

- a) Have the ERP(s) that exist for these pools been reviewed and updated specifically for the purposes of this application?
- b) Has this update included, or will it include, 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)?
- c) If no, please confirm that the Applicant intends to complete this work prior to operating the pools (Ladysmith, Corunna, Seckerton) at the proposed MOPs.