

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B; and in particular section 90(1) and section 97 thereof;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order granting leave to construct natural gas pipelines in the Municipality of Greenstone

**NOTICE OF INTERVENTION
OF
MINODAHMUN DEVELOPMENT LP**

1. Minodahmun Development LP (MDLP) applies for intervenor status in this proceeding.
2. MDLP is a 100% First Nation owned partnership created by Animbiigoo Zaagi'igan Anishinaabek (AZA), Aroland First Nation (AFN) and Ginoogaming First Nation (GFN) (collectively - MDLP First Nation members) to maximize First Nation participation in development projects, with a focus on the mining sector. Minodahmun's goal is to ensure that benefits from development projects are shared equitably with MDLP First Nation members to grow the local economy and provide opportunities for its members.
3. Enbridge Gas Inc. (Enbridge Gas) is applying to the Ontario Energy Board (OEB) pursuant to section 90(1) of the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, for an Order granting leave to construct approximately 13 km of Nominal Pipe Size (NPS) 6 inch extra-high pressure (XHP) steel natural gas main within the Municipality of Greenstone, Ontario, and within the treaty lands and traditional territories of MDLP First Nation members, in order to provide natural gas distribution service to the proposed Greenstone Mine Project. The Greenstone Mine Project is an open pit gold mine located near the city of Geraldton, within the treaty lands and traditional territories of MDLP First Nation members, and operated by Greenstone Gold Mines GP Inc. (Greenstone Gold).
4. The Greenstone Gold is a signatory to a Long-term Relationship Agreement (LTRA) with the MDLP First Nation members, with MDLP representing the First Nation members in implementing the LTRA. The LTRA formalizes Greenstone Gold's commitment towards protecting the environment and supporting the MDLP First Nation members' social and cultural practices, and provides for environmental monitoring, employment, training, business and contracting opportunities.
5. MDLP, AZA, AFN and GFN are affected by this Application with respect to treaty rights, land use, cultural heritage, and economic interests.
6. MDLP intends to participate actively and responsibly in this proceeding, and intends to apply for recovery of its costs reasonably incurred in the course of its intervention in this matter. MDLP believes that it meets the eligibility criteria set out in the Ontario Energy Board's Rules of Practice and Procedure (Section 41) and its' Practice Direction on Cost Awards (Section 3.03).

Issues to be Addressed

7. MDLP's intended participation will include the following:

- a. The appropriateness of the proposed project costs;
- b. Land use, cultural heritage and environmental considerations, including route alternatives and modification of the Enbridge and TransCanada Pipelines Limited (TCPL) facilities at the custody transfer point at the TransCanada pipeline;
- c. The Applicant's approach to consulting MDLP, AZA, AFN and GFN with respect to this application as a Crown approval;
- d. All other components of the Application; and
- e. Generally, to represent the Aboriginal rights interests of MDLP's member First Nations.

The Intervenor's Intended Participation

8. If the OEB determines that it will conduct a hearing for this application, MDLP intends to participate in any pre-hearing procedures, including interrogatories or technical conferences, and settlement conferences. MDLP also intends to participate in any oral hearings of this matter, and in written or oral submissions, as well as any other parts of the process that the OEB should order. While MDLP does not currently intend to file evidence in this proceeding, it reserves its right to do so depending on the responses to interrogatories and any other discovery processes ordered by the Board.

Nature of Hearing Requested

9. If the OEB determines that it will conduct a hearing for this application, until interrogatories have been answered, MDLP believes it is premature to assess whether a written or an oral hearing is more appropriate in this proceeding.

10. MDL requests that a copy of all documents filed with the Board by each party to this proceeding be served on the intervenor, as follows:

- a. MDLP: (electronic copies only)

Minodahmun Development LP, 101 Poplar Crescent, PO Box 89 c/o Ginoogaming First Nation, Longlac, ON, P0T 2A0

Email: john.glover@minodahmun.ca

- b. MDLP's Advisor (electronic copies only)

IBA Braiding Ltd., 4606 Concession 11, Puslinch, ON N0B 2J0

Attn: Don Richardson

Email: don@ibabraiding.com

Respectfully submitted on behalf of Minodahmun Development LP, September 24, 2021.



Don Richardson, Ph.D., Energy Regulatory Advisor to Minodahmun Development LP