

**Ministry of Northern Development,
Mines, Natural Resources and
Forestry**

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

**Ministère du Développement du Nord,
des Mines, 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



VIA e-mail to Board Registrar (registrar@oeb.ca) and RESS

October 13, 2021

Our File No.

Christine Long
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

RE: Application by Enbridge Gas Inc. ("Enbridge")

- **Board File Number: EB-2021-0079**
- **Application for a permit to drill 2 observation wells – 1 in each of the Corunna and Ladysmith Designated Gas Storage Pools**

Dear Madam,

In accordance with the Procedural Orders for this matter, please find attached the Ministry of Northern Development, Mines, Natural Resources and Forestry's Written Submission with respect to the above-referenced application.

Yours truly,

Demetrius Kappos
Counsel
Legal Services Branch

Encl.

- c. The Applicant and Intervenors

ENBRIDGE GAS LIMITED
2021/2022 WELL DRILLING PROJECT
CORUNNA AND LADYSMITH POOLS
EB-2021-0079

**Written Submission of the Ministry of
Northern Development, Mines, Natural Resources and Forestry**

Introduction:

Enbridge Gas Limited (“Enbridge”) made application (“the Application”) to the Ministry of Northern Development, Mines, Natural Resources and Forestry (“NDMNRF”) pursuant to the *Oil, Gas and Salt Resources Act* (“OGSRA”) for two well drilling licences, one in each of the Corunna (proposed well TC 8) and the Ladysmith (proposed well TL8) Designated Gas Storage Areas.

On July 19, 2021, MNRF referred the Applications to the Ontario Energy Board (“OEB”) pursuant to s. 40 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (“OEB Act”) for a Report to the Minister.

The OEB initiated this proceeding subsequent to the NDMNRF referral.

On September 10, 2021, the OEB granted Intervenor status to each of the NDMNRF and Claire and Helen Robbins (the Robbins).

Further to Interrogatories and responses to Interrogatories, the NDMNRF is hereby providing its Written Submission.

Analysis:

NDMNRF Petroleum Operations Section has reviewed Enbridge's Application, other Intervenor's filings, OEB Staff's Interrogatories (including the proposed conditions of approval) and Enbridge's Response to Interrogatories. We are satisfied that the Application is complete and that Enbridge has offered a complete response to all Interrogatories.

Based on the Application and this further information provided, NDMNRF has no objection to the Application's approval subject to the OEB Staff's proposed conditions of approval. With regard to those draft conditions of approval, we interpret that outstanding items that will or may be required from the Ministry of Heritage, Sport, Tourism and Cultural Industries, Hydro One Networks Inc., St. Clair Township or the St. Clair Region Conservation Authority are in each instance addressed under OEB Staff draft conditions of approval #4 and/or #5.

We understand that Enbridge, as per its response to an Interrogatory from OEB Staff, accepts responsibility for all safety and environmental issues and will comply with the OGSRA, O.Reg. 245/97 made under the OGSRA, the Provincial Operating Standards and CSA Z341.1-14 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the NDMNRF.

Conclusion and Relief Requested:

NDMNRF has no objection to approval of the Application, subject to the OEB Staff's proposed conditions of approval.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

DATED AT Toronto, this the 13th day of October, 2021.

Yours truly,

Demetrius Kappos
Counsel
Legal Services Branch
Ministry of Northern Development, Mines, Natural Resources and Forestry

c. The Applicant and Intervenor representatives listed below (by e-mail)

Enbridge Gas Inc. (Applicant):

Tania Persad

Senior Legal Counsel
Enbridge Gas Inc.
500 Consumers Road
North York ON M2J 1P8
Tel: 416-495-5891
Fax: 416-495-5994
Email: tania.persad@enbridge.com

Adam Stiers

Technical Manager, Regulatory Applications
Enbridge Gas Inc.
50 Keil Drive North
P.O. Box 2001
Chatham, ON N7M 5M1
Tel: 519-436-4558
Fax: 519-436-4641
Email: egiregulatoryproceedings@enbridge.com

Claire and Helen Robbins (Intervenors):

Claire and Helen Robbins

Independent Participant
2969 Tecumseh Road
Courtright ON N0N 1H0
Tel: 519-864-1275
Email: crobns@hotmail.com