BY E-MAIL

T 416-481-1967 1-888-632-6273

F 416-440-7656 OEB.ca

November 18, 2021

Mr. Alain Belanger
Manager, Petroleum Operations Section
Ministry of Northern Development, Mines, Natural Resources and Forestry
659 Exeter Road
London ON M6E 1L3
alain.belanger@ontario.ca

Dear Mr. Belanger:

Re: Report to the Minister of Northern Development, Mines, Natural Resources and Forestry

Enbridge Gas Inc. Corunna and Ladysmith Well Drilling Project Ontario Energy Board File Number: EB-2021-0079

Pursuant to Section 40 of the *Ontario Energy Board Act, 1998*, the Minister of Northern Development, Mines, Natural Resources and Forestry referred to the Ontario Energy Board (OEB) an application by Enbridge Gas Inc. (Enbridge Gas) for licences to drill an A-1 observation well in each of the Corunna Storage Pool and the Ladysmith Storage Pool.

Please find attached the OEB's report to the Minister that recommends the issuance of well drilling licences to Enbridge Gas for these two wells, subject to certain conditions of licence.

Please direct any questions relating to this application to Judith Fernandes, Project Advisor at 416-440-7638 or Judith.Fernandes@oeb.ca.

Yours truly,

Original Signed By

Christine E. Long Registrar

Attachment

c: Adam Stiers, <u>EGIregulatoryProceedings@enbridge.com</u>
Tania Persad, <u>Tania.Persad@enbridge.com</u>
Demetrius Kappos, <u>Demetrius.Kappos@ontario.ca</u>



EB-2021-0079

REPORT OF THE ONTARIO ENERGY BOARD TO THE MINISTER OF NORTHERN DEVELOPMENT, MINES, NATURAL RESOURCES AND FORESTRY

Licences to drill an A-1 observation well in each of the Corunna Storage Pool and the Ladysmith Storage Pool in Moore Township, in the Township of St. Clair in the County of Lambton

Before: Robert Dodds, Presiding Commissioner

Anthony Zlahtic, Commissioner David Sword, Commissioner

Date: November 18, 2021

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1. INTRODUCTION AND SUMMARY

On July 30, 2021, pursuant to section 40(1) of the *Ontario Energy Board Act, 1998* (OEB Act), Enbridge Gas Inc. (Enbridge Gas) requested from the Ontario Energy Board (OEB) a favourable report (Report) to the Minister of Northern Development, Mines, Natural Resources and Forestry (the Minister) in respect of an application for licences to drill two A-1 observation wells.

The wells would be drilled within the designated storage area in each of the Corunna Storage Pool (Well TC 8) and the Ladysmith Storage Pool (Well TL 8) (together these two wells are referred to as the 'Project'). Enbridge Gas has the authority to store gas in these designated storage areas¹. The Pools are located in Moore Township, in the Township of St. Clair, in the County of Lambton.

The OEB recommends approval of the application for the well drilling licences, subject to the conditions of licence set out in Appendix A to this Report.

2. PROCESS

A Notice of Hearing was issued on August 18, 2021.

The Ministry of Northern Development, Mines, Natural Resources and Forestry and Claire and Helen Robbins (the Robbins) applied for intervenor status. No objection was received from Enbridge Gas. Both parties were granted intervenor status, with the Robbins also approved for cost award eligibility.

Procedural Order No. 1 was issued on September 10, 2021 and set out a process for interrogatories and submissions. OEB staff filed interrogatories on September 20, 2021 and Enbridge Gas provided its responses on September 30, 2021.

OEB staff and the intervenors filed written submissions on October 14, 2021. Enbridge Gas filed its reply submission on October 28, 2021.

¹ Granted by the OEB in E.B.O. 5, E.B.L.O. 269, E.B.O. 212/213, and E.B.R.M 112.

3. FACTORS TO CONSIDER

When reviewing and reporting to the Minister on well drilling licence applications, the OEB considers the following factors:

- Project need and timing
- Proposed facilities and regulatory compliance
- Project costs and impact on ratepayers
- Landowner matters associated with the project
- Environmental impacts of the project
- Indigenous consultation associated with the project

The evidence and the OEB's findings related to each of these factors are described below.

3.1 PROJECT NEED AND TIMING

Need for the Project

Enbridge Gas stated that the wells are needed to assist in the continued safe and reliable operation of these two Enbridge Gas storage facilities by monitoring natural gas content and pressure of each of the pools. They will not result in an increase in storage capacity or an increase in deliverability in either of the pools.

The Corunna and Ladysmith Storage Pools contain Guelph Formation observation wells that monitor the pressure in the Guelph reef formation where the gas is stored, but do not contain A-1 Formation observation wells.

The A-1 Formation is adjacent to the Guelph reef. Regional geology suggests there is potential for gas to be moving between the Guelph Formation and the A-1 Formation. A-1 observation wells are used to monitor this movement, and are used as a tool in storage pool material balance studies to supplement the information obtained from the Guelph observation wells.

An A-1 observation well can assist with potential adjustments to pool size and inventory by providing more accurate measurement of gas pressures in the A-1 Formation.

Enbridge Gas stated that it is not aware of any comparable alternative facility or non-facility solution that would enable it to monitor the actual movement of natural gas between the Guelph Formation and the A-1 Formation, nor is it aware of any such

solution that would provide the ancillary benefit of an A-1 observation well in terms of improving inventory management.

OEB staff submitted that based on Enbridge Gas's evidence, the Project is needed.

Findings

The OEB finds that the Project is needed to enable Enbridge Gas to monitor movement of natural gas volumes between the Guelph Formation and the A-1 Formation, and to assist Enbridge Gas in improving inventory management for the storage pools.

Project Schedule

Enbridge Gas initially requested a favourable report from the OEB to the Minister by September 16, 2021 to ensure that drilling could take place during October 2021, when no injection or withdrawal operations were anticipated and the pressures of the impacted storage reservoirs would be below 5,500 kPa.

Enbridge Gas stated that for the drilling work to be done safely, it must occur outside of storage injection/withdrawal operational cycles during a period in which reservoirs are at a low pressure.

Enbridge Gas stated that drilling needed to be completed by October 15, 2021, so that there would be no disruption to service from the storage pools. Otherwise, the Project would need to be deferred to 2022 following the close of storage withdrawal operations.

In response to OEB staff interrogatories, Enbridge Gas confirmed that it now expects to undertake the Project between May and July of 2022.²

OEB staff stated that it has no issues or concerns with the revised schedule for the Project.

Findings

The OEB finds the revised schedule for the Project to be acceptable. Enbridge Gas's application was received on July 30, 2021 and Notice was issued by the OEB on August 18, 2021. The OEB notes that Enbridge Gas's initial request for a favourable report by September 16, 2021 was ambitious from a timing perspective and not in keeping with the OEB's well established schedule for an application of this nature.

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² Exhibit I, Staff 1

3.2 PROPOSED FACILITIES AND REGULATORY COMPLIANCE

Proposed Facilities

The Project requires the construction of gravel pads and access lanes.

For Well TC 8, Enbridge Gas must construct the following features:

- A gravel pad temporary work space area of approximately 1,600 m² with a silt fence around the perimeter in order to complete the drilling of the well. Once the drilling of well TC 8 is complete, the gravel pad will be reduced to approximately 30 m².
- A 6 m wide x 70 m long permanent gravel lane will be constructed off of the existing gravel lane in order to allow access to the well site.

For Well TL 8, Enbridge Gas must construct the following features:

- A gravel pad temporary workspace area of approximately 4,800 m² with a silt fence around the perimeter in order to complete the drilling of the well. Once the drilling of well TL 8 is complete, the gravel pad will be reduced to approximately 30 m²
- A 6 m wide x 90 m long permanent gravel lane will be constructed off of an existing gravel road, owned by St. Clair Township which is being transferred to Enbridge Gas, located south of Courtright Line (Highway 80) in order to allow access to the well site.

The gravel pads will provide all-weather access and all activities associated with the drilling of the well will occur on the pad and laneway.

Upon completion, permanent access laneways to the well sites will remain and the remainder of the land will be restored, and any drainage tile issues will be resolved in accordance with Enbridge Gas's construction and maintenance standards.

No pipeline facilities are required for these observation wells.

Enbridge Gas stated that all design, installation and testing of the proposed wells will be in accordance with the *Oil, Gas & Salt Resources Act* (OGSRA), Ontario Regulation 245/97, OGSRA Standards v.2.0 and the Canadian Standards Association standard *Z341 Storage of Hydrocarbons in Underground Formations*.

In its submission, the Ministry of Northern Development, Mines, Natural Resources and Forestry noted Enbridge Gas's response to OEB staff's interrogatory confirming that it

is responsible for all safety and environmental issues and will comply with above noted regulatory compliances to the satisfaction of the Ministry.³

Findings

The OEB finds the construction of the proposed facilities to be appropriately planned and accepts the undertaking by Enbridge Gas that all design, installation and testing of the proposed wells will be in accordance with applicable regulation.

3.3 PROJECT COSTS AND IMPACT ON RATE PAYERS

Enbridge Gas stated that the Project will be funded entirely by Enbridge Gas's shareholder as an unregulated storage asset forming part of its unregulated storage operations. Consequently, all costs associated with the Project will be captured in unregulated accounts. Enbridge Gas also stated that there will be no rate impact to Enbridge Gas's customers as a result of the Project.

OEB staff submitted that it is appropriate that the Project costs be funded by Enbridge Gas's shareholders as Enbridge Gas states the Project benefits the unregulated business.

Findings

The OEB acknowledges and accepts that all costs associated with the Project will be captured in unregulated accounts and Enbridge Gas's ratepayers will not incur any rate impacts as a result of the Project.

3.4 ENVIRONMENTAL IMPACTS

Enbridge Gas retained AECOM Canada Ltd. (AECOM) to undertake an environmental screening to identify potential environmental and socio-economic impacts associated with the Project. The Environmental Report concluded that ongoing with the implementation of the report's recommendations, landowner communication, and adherence to permit and regulatory requirements, the proposed Project will be constructed in a manner that protects the environment and mitigates potential impacts.

Stage 1 and Stage 2 Archaeological Assessments for the Project were completed by AECOM and the reports were submitted to the Ministry of Heritage, Sport, Tourism and Cultural Industries (MHSTCI).

³ Ministry of Northern Development, Mines, Natural Resources and Forestry submission, p. 3

The Stage 1 Archaeological Assessment Report was screened by the MHSTCI and was accepted into the Ontario Public Register of Archaeological Reports on April 29, 2021.

The Stage 2 Archaeological Assessment Report for Well TC 8 was submitted to the MHSTCI on June 28, 2021 and was accepted into the Ontario Register of Archaeological Reports on June 30, 2021.

The Stage 2 Archaeological Assessment survey for Well TC 8 did not identify any artifacts.

The Stage 2 Archaeological Assessment survey for Well TL 8 identified 19th to 20th century Euro-Canadian artifact scatter requiring a further Stage 3 archaeological investigation.

Enbridge Gas initially indicated that the Stage 3 Archaeological Assessment survey would be completed in the summer of 2021.

However, in response to OEB staff interrogatories, Enbridge Gas stated that given its ongoing negotiations with an impacted landowner and deferral of the Project construction to 2022, it has rescheduled the Stage 3 Archaeological Assessment to take place in November 2021 and expects to receive a clearance letter from the MHSTCI in early 2022.⁴

As part of the interrogatory process, OEB staff proposed certain conditions of licence to ensure that impacts of well drilling are mitigated and monitored.

Enbridge Gas confirmed that it had no concerns with the conditions of licence proposed by OEB staff.⁵ In its reply submission, Enbridge stated that it will comply with the final conditions of licence established by the OEB.⁶

In its submission, the Ministry of Northern Development, Mines, Natural Resources and Forestry stated that it has no objection to approval of the application, subject to OEB staff's proposed conditions of approval.⁷

<u>Findings</u>

The OEB finds that Enbridge Gas has satisfactorily identified and addressed potential environmental impacts, subject to the following conditions:

⁴ Exhibit I, Staff 3

⁵ Exhibit I, Staff 8

⁶ Enbridge Gas reply submission, p.6

⁷ Ministry of Northern Development, Mines, Natural Resources and Forestry, p. 3

- a) The Stage 3 Archaeological Assessment is completed and a clearance letter from the MHSTCI is received. This will be among the approvals required under Condition 5 as set out in Appendix A.
- b) Enbridge Gas complies with the Recommended Conditions of Licence in Appendix A

3.5 LANDOWNER MATTERS

As noted in section 3.2 of the Report, the Project requires the construction of gravel pads and access lanes.

Enbridge Gas stated that its land agents have notified the parties directly impacted by the Project.

The impacted party for Well TC 8 is a tenant farmer on land owned by Enbridge Gas at the Corunna designated storage area. The tenant farmer provided Enbridge Gas with a letter of support for the Project.

For Well TL 8, the impacted parties are a third party farmer (the Robbins), the Township of St. Clair, Infrastructure Ontario, and Hydro One Networks Inc. (Hydro One).

Enbridge Gas provided further information in response to OEB staff interrogatories⁸ with respect to these impacted parties:

- Enbridge stated that it has a Gas Storage Lease which gives it legal rights to drill on the land owned by the Robbins. Enbridge Gas stated that the Robbins have outstanding concerns regarding the Project and as a result, negotiations are ongoing. Enbridge Gas provided a confidential summary of the discussions and actions it has taken to date and measures it intends to undertake to address the Robbins' expressed concerns about the Project and stated that it is committed to continuing ongoing consultations with the Robbins to reach an agreement in advance of the commencement of Project construction in 2022.
- Enbridge Gas confirmed that an existing gravel road, owned by the Township of St. Clair has been transferred to Enbridge Gas in order to allow access to the well site.
- Enbridge Gas stated that it is in ongoing discussions with Infrastructure Ontario
 regarding an easement for a permanent gravel lane to be constructed that
 intersects with the gravel road transferred to Enbridge Gas by the Township of

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⁸ Exhibit I, Staff 4 and Staff 5

St. Clair. Enbridge Gas expects to have the easement in place in advance of the Project construction in 2022.

Hydro One holds an easement that Enbridge Gas will cross for the purposes of
constructing the Project. Enbridge Gas is in ongoing discussions with Hydro One
to obtain a Construction and Encroachment agreement. Enbridge Gas expects to
have this agreement in place prior to the construction of the Project in 2022.

In a letter of comment, Mr. Gary Robbins (Gary Robbins) who has an adjacent property, expressed concern about the Project. Gary Robbins stated that the Enbridge Gas development has changed the grades and elevations and there are increasing amounts of water running off onto his property.

Enbridge Gas responded to OEB staff interrogatories on Gary Robbins' concerns⁹, stating that this matter does not relate in any way to the proposed Project or to the lands affected by the proposed Project. Enbridge Gas stated that Well TL 8 is located on the opposite side of Courtright Line and will not affect the drainage on Gary Robbins' property.

Enbridge Gas stated that Gary Robbins filed a similar letter of comment with the OEB in the Ladysmith Storage Pool Well Drilling Project proceeding ¹⁰ regarding the same drainage problem. Enbridge Gas stated that to address Gary Robbins' concerns at that time, it hired a drainage contractor to survey and rectify the problem by installing 360' of 6" tile in the naturally occurring low-lying area where ponding occurs.

Enbridge Gas further stated that on September 3, 2021, Gary Robbins phoned Enbridge Gas land agents to suggest that Enbridge Gas construct a swale along the western edge of the laneway to stop the water from flowing to the natural lower elevation (where the tile had been installed to address his drainage concerns) and into his property. Enbridge Gas stated that it has advised Gary Robbins that his concerns and suggestion would be considered.

The Robbins made several submissions that were responded to by Enbridge Gas. 11

The Robbins argued that despite the tenant letter of support provided by Enbridge Gas for Well TC 8, the two wells – Well TL 8 and Well TC 8 – are not comparable. The Robbins requested that Enbridge Gas disclose the distance of the tenant farmer's residence and livestock operations from the proposed Well TC 8 drilling site. The

⁹ Exhibit I, Staff 6

¹⁰ EB-2019-0012

¹¹ Robbins's submission, p. 2,11 and Enbridge Gas reply submission, pp. 7-9

Robbins also requested further proof from Enbridge Gas on the impact of the well drilling on livestock health.

Enbridge Gas responded stating that the natures of construction activities at both locations are nearly identical and while the tenant farmer's residence and livestock operations are located at a greater distance from the proposed drilling site for Well TC 8 (approximately 20 km), this fact does not negate the letter of support and should not dissuade the OEB from issuing a favourable report. Enbridge Gas referred to its response to OEB staff interrogatories 12, setting out the noise and vibration mitigants it intends to put in place while drilling Well TL 8 to address the Robbins' concerns. Enbridge Gas also reiterated its commitment to continuing to work with the Robbins to find additional or alternative solutions if the proposed mitigation measures are not successful. Enbridge Gas noted that the Robbins had input into the location of the proposed drilling site for Well TL 8 on multiple occasions and approved the final location. 13

The Robbins also provided several attachments relating to the acquisition of the existing gravel road by Enbridge Gas from the Township of St. Clair, and submitted that the purchase of this property was not an act of goodwill by Enbridge Gas.

Enbridge Gas responded stating that it has provided the Robbins with a Letter of Acknowledgement, which indicates that it is willing to compensate the Robbins for the laneway if so directed by the property owner, arguing that it is not obligated to compensate any landowner for any lands it does not own. Enbridge Gas stated that it has advised the Robbins that they can continue using the laneway as they have in the past and that Enbridge Gas will maintain the property at its own cost going forward.

The Robbins also raised concerns about future well sites, and made allegations about Enbridge Gas's lack of management of previous projects, namely the remediation of the NPS 10 Payne Kimball Line and well site #T009043. Enbridge Gas stated that these matters have no bearing upon the current application before the OEB or the proposed Well TL 8.

Enbridge Gas stated that it is in ongoing negotiations with the Robbins regarding the remediation of the NPS 10 Payne Kimball Line and has agreed to their requests. Enbridge Gas also stated that it is currently conducting an environmental study to support remediation of well site #T009043 and expects to complete that work by the end of 2021. Enbridge Gas noted that this well site is not located on the Robbins' property.

¹² Exhibit I, Staff 5 a)

¹³ Exhibit I. Staff 5, CONFIDENTIAL Attachment 1, pp. 1-2

OEB staff submitted that based on Enbridge Gas's evidence and responses, it appears that Enbridge Gas is appropriately managing land-related matters. OEB staff further submitted that Enbridge Gas's compliance with OEB staff's recommended conditions of licence will ensure that impacts of well drilling are mitigated and monitored.

The Ministry of Northern Development, Mines, Natural Resources and Forestry submitted that based on the application and information provided in response to interrogatories, it has no objection to approval of the application subject to the OEB staff's proposed conditions of licence.

The Ministry of Northern Development, Mines, Natural Resources and Forestry also noted that with regard to the proposed licence conditions, it interprets that outstanding items that will or may be required from the MHSTCI, Hydro One, St. Clair Township or the St. Clair Region Conservation Authority are in each instance addressed under OEB staff's proposed licence conditions 4 and/or 5.¹⁴

Findings

The OEB finds that Enbridge Gas is appropriately managing land-related matters and that Enbridge Gas's compliance with the recommended conditions of licence will ensure that impacts of well drilling are mitigated and monitored. The reasons for this finding with respect to the issues raised by the Robbins are given below.

Mr. Gary Robbins (Gary Robbins) expressed concern about the impact of the Project on drainage onto an adjacent property owned by him. The OEB accepts Enbridge Gas's explanation that Well TL 8 is located on the opposite side of Courtright Line and will not affect the drainage on Gary Robbins' property.

The OEB agrees with Enbridge Gas that the nature of construction activities at both locations are comparable. The OEB notes that the Robbins had input into the location of the proposed drilling site for Well TL 8 and approved the final location. ¹⁵

The OEB also notes that Enbridge Gas reiterated its commitment to continuing to work with the Robbins to find additional or alternative solutions if the proposed mitigation measures are not successful.

The OEB finds that the ownership of a gravel laneway was properly established by Enbridge Gas and that compensation to the Robbins, who are not owners, is not supportable. Further, any claim for compensation is not warranted on the basis that Enbridge Gas has advised the Robbins that they can continue utilizing the laneway as

¹⁴ Ministry of Northern Development, Mines, Natural Resources and Forestry submission, p.3

¹⁵ Exhibit I. Staff 5, CONFIDENTIAL Attachment 1, pp. 1-2

they have in the past and that Enbridge Gas will maintain the property at its own cost going forward.

The OEB finds that allegations about Enbridge Gas's lack of management of previous projects have no bearing upon the current application before the OEB.

3.6 INDIGENOUS CONSULTATION

Enbridge Gas provided the Ministry of Energy with a project description on January 14, 2021.

As part of its application, Enbridge Gas provided the Ministry of Energy's response indicating that, as no leave to construct approval is required for the Project, the Ministry determined that the duty to consult was not triggered and thus, it would not be delegating the procedural aspects of consultation to Enbridge Gas for the Project.

Findings

The OEB finds that in this case the duty to consult was not triggered and no delegation of the procedural aspects of consultation was required.

4. RECOMMENDATION

For the reasons stated in the Report, the OEB recommends approval of the application for the well drilling licences, subject to the recommended conditions of licence in Appendix A.

This recommendation shall expire twelve months from the date of this Report.

DATED at Toronto, November 18, 2021

ONTARIO ENERGY BOARD

Original Signed By

Christine E. Long Registrar

Appendix A Recommended Conditions of Licence

- 1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2021-0079 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed well.
- 2. The authority granted under this licence to Enbridge Gas is not transferable to another party without leave of the OEB. For the purpose of this condition, another party is any party except Enbridge Gas.
- 3. Enbridge Gas shall construct the facilities and restore the land in accordance with its application and evidence given to the OEB, except as modified by this licence and these Conditions.
- 4. Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding.
- 5. Prior to commencement of construction of the proposed wells, Enbridge Gas shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the proposed well.
- 6. Enbridge Gas shall ensure that the movement of equipment is carried out in compliance with all procedures filed with the OEB, and as follows:
 - Enbridge Gas shall make reasonable efforts to keep the affected landowner(s) as well as adjacent landowners and their respective tenant farmers, or their designated representatives, informed of its plans and construction activities; and
 - ii. The installation of facilities and construction shall be coordinated to minimize disruption of agricultural land and agricultural activities.
- 7. Enbridge Gas shall, subject to the recommendation by an independent tile contractor and subject to the landowner's approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.

- 8. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:
 - a) A Post Construction Report, within three months of the in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 1;
 - ii. Describe any impacts and outstanding concerns identified during construction;
 - iii. Describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) A Final Monitoring Report, no later than fifteen months after the inservice date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 1;
 - ii. Describe the condition of any rehabilitated land;
 - iii. Describe the effectiveness of any actions taken to prevent or mitigate any identified impacts during construction;
 - iv. Include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions.

- 9. For the purposes of these conditions, Enbridge Gas shall conform:
 - a) With Canadian Standards Association Z341 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the Ministry of Northern Development, Mines, Natural Resources and Forestry; and
 - b) With the requirements for wells as specified in the *Oil, Gas and Salt Resources Act*, its Regulation 245/97, and the Provincial Operating Standards v.2 to the satisfaction of the Ministry of Northern Development, Mines, Natural Resources and Forestry.
- 10. Enbridge Gas shall designate one of its employees as project manager who will be the point of contact for these conditions, and shall provide the employee's name and contact information to the Ministry of Northern Development, Mines, Natural Resources and Forestry, the OEB and to all affected landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.