

**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 email (boardsec@ontarioenergyboard.ca) and RESS filing

Our File No.

December 17, 2021

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

**RE: Enbridge Gas Distribution Inc.
Application for approval to increase maximum operating pressure in Dow
Moore and Payne natural gas storage pools; a licence for a new natural gas
storage well in the Kimball-Colinville DSA; and approval for new pipeline
associated with the new storage well.
OEB File No.: EB-2021-0078**

Dear Ms. Long:

In accordance with the Board's Procedural Order No. 1 dated December 13, 2021,
attached you will find the written interrogatories of the Ministry of Northern
Development, Mines, Natural Resources and Forestry.

Yours truly,

Demetrius Kappos
Counsel
Legal Services Branch

c: Enbridge:

Dave Janisse
Technical Manager, Leave to Construct Applications
Email: EGlregulatoryProceedings@enbridge.com

Tania Persad
Senior Legal Counsel
Email: tania.persad@enbridge.com

Enbridge Gas Inc.
Application for Increase in Maximum Operating Pressure
Board File No. EB-2021-0078

**Interrogatories of the Ministry of Northern Development, Mines,
Natural Resources and Forestry (“MNDMNRF”)**

1. In the Applicant’s **pre-filed evidence at Exhibit C, Tab 1, Schedule 1, page 5, paragraph 18**, the Applicant indicated that, as part of the project, they plan to install new master valves and new wellheads for all 26 subject wells and emergency shutdown valves for 24 of the wells.

Interrogatories:

- a) Please provide brief technical specifications of the existing master valves and wellheads and brief technical specifications of the proposed replacement units.
 - b) Please confirm that a new Form 7 (Drilling and Completion Report) from the Provincial Standards under the *Oil, Gas and Salt Resources Act* will be filed with MNDMNRF with respect to each well.
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2. In the Applicant’s **pre-filed evidence, at Exhibit E, Tab 1, Schedule 1, page 1, paragraph 4**, the Applicant has indicated that they intend to fulfill, to the satisfaction of the MNDMNRF, all the relevant requirements of CSA Z341.1-18.

Interrogatory:

- a) Please confirm that the Applicant accepts a condition of approval that it will follow the current CSA Z341.1-18 standard to the satisfaction of MNDMNRF and that going forward it intends to adopt any future revisions to CSA Z341.1.

- 3. In the Applicant's **pre-filed evidence, at Exhibit E, Tab 1, Schedule 1, page 2, paragraph 7**, the Applicant indicates that for each of the applicable two storage pools a Neighbouring Assessment and a "What If" Risk Assessment was completed in support of the application.

Interrogatories:

- a) In the course of the "What If" Risk Assessments, was consideration given to regulatory public safety and environmental requirements (e.g., under the *Occupational Health and Safety Act* and under the *Environmental Protection Act*)?
- b) Has the proposed increase in operating pressure at each of the applicable two storage pools been considered from a risk perspective with respect to the impacts to the environment and to public health and safety from uncontrolled surface and/or subsurface gas release?
- c) In the course of the "Neighbouring Activities" Assessment, please briefly describe what type of well information and documentation were reviewed.

- 4. In the Applicant's **pre-filed evidence, at Exhibit C, Tab 1, Schedule 1, page 3, item 12 and page 5, paragraph 17**, the Applicant indicates that an engineering study was conducted by Geofirma Engineering Ltd. for each of the applicable two storage pools and that these engineering studies incorporated data from geomechanical and regional in-situ tests completed on the reservoir and caprock formations.

Interrogatory:

- a) For each storage pool, please specify and list in chronological order the engineering and geological/geomechanical studies and tests referenced above.

5. In the Applicant's **pre-filed evidence, at Exhibit C, Tab 1, Schedule 1, page 9, paragraph 37**, the Applicant indicates that the drilling and well upgrades must take place between April and August 2022 to ensure no disruption to service from the storage pools and to ensure the pool pressure will be suitable to safely complete the drilling of the well and the well upgrade works.

Interrogatory:

- a) Please describe what impact the COVID-19 pandemic, including any potential for Emergency Orders under the *Emergency Management and Civil Protection Act*, may have on the timing referred to above for the accomplishment of these and other work-related steps related to this proposal.

6. In the Applicant's **prefiled evidence, at Exhibit C, Tab 1, Schedule 1, page 6, paragraph 24**, the Applicant has committed that, as part of the project, it will review and, if necessary, update operating procedures and emergency response plans prior to operating the subject pools at the increased pressure levels.

Interrogatory:

- a) Will the Applicant's review of the emergency response plans include a consideration of provisions addressing notification of neighbours, the public, and public agencies in the event of an emergency (e.g., has contact information been updated)?