**Dave Janisse** Technical Manager Regulatory Affairs

tel 519-436-5442 dave.janisse@enbridge.com Leave to Construct Applications EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc. 50 Keil Drive North, Chatham, ON N7M 5M1 Canada

### **VIA EMAIL and RESS**

January 17, 2022

Nancy Marconi Registrar Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

Re: Enbridge Gas Inc. (Enbridge Gas) Ontario Energy Board (OEB) File No. EB-2021-0078 2022 Storage Enhancement Project – Interrogatory Responses

In accordance with Procedural Order No. 1, enclosed please find Interrogatory Responses of Enbridge Gas in the above noted proceeding.

These responses have been filed electronically through the OEB's RESS.

If you have any questions, please contact the undersigned.

Sincerely,

(Original Signed)

**Dave Janisse** Technical Manager, Leave to Construct Applications

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.1 Page 1 of 3

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

### Reference:

Exh A/Tab 2/Sch1/p.2,3, Exh B/Tab1/Sch1/p.1 and Exh C/Tab1/Sch1/p.1

#### Preamble:

Enbridge Gas states that for the current storage year (April 2021 to March 2022), it is fully contracted with respect to unregulated storage space and deliverability. The additional 88,300 103m3 of storage capacity created by the Project will be sold as part of Enbridge Gas's unregulated storage portfolio.

The Project involves increasing the maximum operating pressure (MOP) in the Dow Moore storage pool to a maximum pressure gradient of 16.51 kPa/m (0.73 psi/ft) and increasing the MOP in the Payne storage pool to a maximum pressure gradient of 17.19 kPa/m (0.76 psi/ft) during the 2021 injection season.

Enbridge Gas states that the drilling of TKC 69 well is to add deliverability and is necessary to support the incremental capacity created by the Project. The Project includes the installation of emergency shut-down valves and wellhead upgrades at the storage pools.

#### Question:

- a) Please comment on any expressions of interest received to date for incremental unregulated storage deliverability and capacity that would be derived from this Project. Please provide any other information that demonstrates the extent to which demand exceeds contracts awarded.
- b) Does Enbridge Gas plan to hold an open season in connection with the increased storage capacity that is created by the Project?
- c) Please confirm whether the incremental deliverability from the TKC 69 well is required to fulfil any particular long-term contracts that Enbridge Gas has entered or expects to enter into or for any particular facilities. Please provide an explanation.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.1 Page 2 of 3

- d) Please provide the split of the current capacity of the Pools between regulated and unregulated storage customers.
- e) Please confirm that the proposed facilities (upgraded wellheads and new emergency shutdown valves) will not benefit regulated customers. If this cannot be confirmed, please explain.
- f) If regulated customers will benefit from these proposed facilities, please provide a complete breakdown of all capital costs associated with the Project and the proportion of those capital costs that would be allocated to the regulated storage operations.

### Response

- a) Enbridge Gas has not held any specific open seasons for the incremental storage capacity or deliverability to be created by the Project. The Company does not generally contract to sell storage services for incremental capacity or deliverability until later in the construction schedule when there is more certainty the storage capacity will be available. The capacity created by this Project will be sold concurrently with the remainder of the available capacity in the unregulated storage portfolio. Each storage year, Enbridge Gas has capacity available as a result of expiring contracts. Enbridge Gas is confident that the incremental storage capacity and deliverability from the Project will be sold over the long term. For the current storage year (April 1, 2021 to March 31, 2022), Enbridge Gas is currently fully contracted and has historically been fully contracted with respect to unregulated storage space and deliverability. Consistent with past experience, demand for unregulated storage services in the most recently held open season significantly exceeded contracts awarded (factor of 3).
- b) The unregulated space and deliverability created by the Project will be added to Enbridge Gas's overall unregulated storage portfolio and will be part of future open seasons or sold directly to storage market counterparties.
- c) The incremental deliverability is not tied to any specific long-term contract. The incremental deliverability created by TKC 69 will support the marketing of the incremental space created by the Project (i.e. storage contract parameters include entitlement to a specific amount of space and a specific amount of deliverability). As Enbridge Gas increases the total amount of space available, the total amount of deliverability available will also need to increase to continue to provide the same level of service to the market. The incremental storage capacity and deliverability will be marketed as part of Enbridge Gas' unregulated storage business.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.1 Page 3 of 3

d) Regulated and unregulated storage capacity is not tracked at a pool level but rather is tracked in total by each legacy company.

However, Enbridge Gas does track the capital cost of the regulated and unregulated storage assets by pool using OEB approved cost allocation methodologies. At the time of the OEB's Natural Gas and Electricity Interface Review (NGEIR), all legacy Enbridge Gas Distribution pools were 100% regulated and legacy Union Gas pools were allocated 62.3% to regulated and 37.7% to unregulated. Any storage enhancement work done subsequent to this time by the unregulated business has changed the cost allocation of impacted pools accordingly. The current allocation of each of the storage pools impacted by the Project is outlined below:

Storage Pool	Regulated	Unregulated
Dow Moore (LEGD)	100%	0%
Kimball-Colinville (LEGD)	100%	0%
Payne (LUGL)	53%	47%

- e) The space and deliverability created from the proposed facilities will be for the benefit of the unregulated storage business. Upgrading of wellheads and ESVs to increase the maximum operating pressure of the pools will benefit both regulated and unregulated customers. However, the cost of the proposed upgrades will be funded by Enbridge Gas's shareholder. This treatment is consistent with past Enbridge Gas Storage Enhancement Project applications approved by the OEB.<sup>1</sup>
- f) Please see response to part e) above. All costs associated with the Project will be allocated to unregulated accounts. Enbridge Gas's ratepayers will not incur any rate impacts as a result of the Project.

<sup>&</sup>lt;sup>1</sup> EB-2020-0074: 2020 Storage Enhancement Project, EB-2020-0256: 2021-2022 Storage Enhancement Project

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.2 Page 1 of 1

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### **INTERROGATORY**

Reference:

Exh A/Tab 2/Sch1/p.2

#### Preamble:

Enbridge Gas states that the OEB previously imposed the following condition on Enbridge Gas's predecessor regarding the MOP of Dow Moore storage pool:

Tecumseh shall not operate the Dow Moore Pool above a pressure representing a pressure gradient of 0.7 psi per ft. depth (15.9 kPa/m) without the leave of the Board.<sup>1</sup>

If the OEB approves Enbridge Gas's requested increases to MOP of the pools, OEB staff proposes the following condition:

Enbridge Gas Inc. shall not operate the Dow Moore natural gas pool above the pressure gradient of 16.51 kPa/m (0.73 psi/ft) depth and the Payne natural gas pool above the pressure gradient of 17.19 kPa/m (0.76 psi/ft) depth without leave of the OEB.

#### Question:

Does Enbridge Gas have any objection to the OEB imposing the above noted condition of approval? If so, please explain Enbridge Gas's opposition to such a condition and provide any proposed alternative wording for the condition.

#### Response

Enbridge Gas does not have any objection to the OEB imposing the above noted condition of approval.

<sup>&</sup>lt;sup>1</sup> E.B.O. 147, E.B.L.O. 224 Decision with Reasons, Appendix II.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.3 Page 1 of 3

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

### Reference:

Exh B/Tab 1/Sch1/p.1 and Exh C/Tab 1/Sch1/p.1,2

### Preamble:

The Project is part of a larger project to increase deliverability and storage capacity at Enbridge Gas's storage facilities. Enbridge Gas states that the pools selected for MOP increase were chosen based on their geological similarity to other Enbridge Gas pools that have undergone a pressure increase and have been operated successfully at an elevated pressure gradient of 16.5 kPa/m (0.73 psi/ft) or 17.2 kPa/m (0.76 psi/ft) for many years.

Enbridge Gas states that hydraulic modeling was conducted on its storage system and it was determined that drilling a well in the southern region of the Kimball-Colinville Storage Pool would provide the greatest amount of deliverability for the Enbridge Gas unregulated storage portfolio.

### **Question**:

- a) Please provide any other available information studies or models (or links, if publicly available) that form the basis for Enbridge Gas's assessment and selection of the pools as the preferred options for meeting the identified need.
- b) Please advise as to whether there will be any additional phases of the project. Please provide an updated project summary similar to the one provided in OEB Staff Interrogatory 3(a) in EB-2020-0256 outlining the types of work (e.g., delta pressuring, well drilling, pipeline construction), pool names and locations, increased capacity per pool, possible timing, estimated costs, proposed treatment of costs (i.e., allocation between regulated and unregulated operations), expected land use requirements, unusual environmental concerns, and any potential Indigenous consultation concerns for any future additional storage enhancement projects.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.3 Page 2 of 3

- c) Please provide Enbridge Gas's rationale for enhancing deliverability in more than one phase. Please address, without limitation, business, economic, environmental, and cost aspects, as well as technical and operational aspects of the multi-phase plan.
- d) As this Project is part of a larger project to increase deliverability and storage capacity at Enbridge Gas's storage facilities, has Enbridge Gas conducted any analysis regarding the impact of increasing the MOP in Enbridge Gas pools on lost and unaccounted-for gas? If so, please describe the analysis undertaken and any findings. To the extent that increased pressure gradient may result in higher lost and unaccounted for gas, is Enbridge Gas proposing that the resulting costs also be allocated to the unregulated storage operations? Please explain.

### Response

- a) The pools for the Project were chosen based on their geological similarity to other Enbridge Gas pools that have undergone a pressure increase and have been operated successfully at an elevated pressure gradient of 16.5 kPa/m (0.73 psi/ft) or 17.2 kPa/m (0.76 psi/ft) for many years.
  - There are no additional studies or models that Enbridge Gas relied upon for the selection of Pools. The order of Pool development was based on technical information that it had available for each pool, the impact on operations, the availability of contractors and the additional planning required to develop pipeline and station improvements required for each phase.
- b) Enbridge Gas is evaluating storage enhancement projects at the Kimball-Colinville and Waubuno Storage Pools with projected in-service dates between 2024 and 2026. The projects are in the early phases of evaluation, project engineering and design, and Enbridge Gas internal management approval. Due to the early development stages of any future unregulated storage enhancements, the requested information regarding project specifications, timing, and potential impacts on lands, the environment, and/or Indigenous consultation requirements are not yet available.
- c) The phased approach has allowed time to complete technical studies, such as Environmental Screening Reports, including Species at Risk studies and Archaeological Assessments; Engineering Assessments, Geological Assessments; Neighbouring Activities Assessments and Risk Assessments.

Completing work in phases minimizes the impact on operations. Enbridge Gas is

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.3 Page 3 of 3

only able to complete the necessary upgrades on a limited number of storage pools in a single year and maintain injectability. Only a limited number of pools can be taken out of service at any one time without causing an interruption to gas supply operations and this will allow Enbridge Gas to meet any contracted requirements.

d) Please see the response at Exhibit I.STAFF.4.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.4 Page 1 of 2

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

Reference:

Exh A/Tab 2/Sch 1, p.3

#### Preamble:

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

### Question:

Please confirm and explain whether this includes all direct and indirect costs (e.g. indirect overhead costs) associated with the Project. Please explain how and when indirect costs would be allocated to the unregulated storage operations.

### Response

All direct costs associated with the Project are captured in the project account and capitalized as an unregulated storage asset. Indirect costs associated with Enbridge Gas's storage operation are not capitalized, but rather are expensed to the unregulated business as they are incurred. Currently, Enbridge Gas allocates these indirect costs proportionately across each legacy utility's unregulated and regulated storage business.

In Enbridge Gas's 2021-2022 Storage Enhancement Project proceeding, OEB Staff submitted similar questions about the impact of increasing MOP on indirect costs, and particularly on lost and unaccounted-for-gas ("LUF"). OEB Staff later submitted that Enbridge Gas should be directed to monitor and report back on the impact that increases in MOP and increased deliverability capability may have on LUF on all existing and new storage enhancement projects. In its reply submission, Enbridge Gas

<sup>&</sup>lt;sup>1</sup> EB-2020-0256 Exhibit I.STAFF.3 part d) and e)

<sup>&</sup>lt;sup>2</sup> EB-2020-0256 OEB Staff Submission, March 3, 2021, page 5

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.4 Page 2 of 2

stated that it will address the impact of increased MOP on LUF as part of its next rebasing application.<sup>3</sup>

In its EB-2020-0256 Decision and Order, the OEB directed Enbridge Gas as part of its next rebasing application to address the allocation of all costs between its rate regulated and unregulated storage business. This should include, without limitation, consideration of lost and unaccounted-for-gas.<sup>4</sup>

As directed, Enbridge Gas will file this information as part of its upcoming rebasing application.

<sup>&</sup>lt;sup>3</sup> EB-2020-0256 Enbridge Gas Reply Submission, March 15, 2021, page 8

<sup>&</sup>lt;sup>4</sup> EB-2020-0256 Decision and Order, April 22, 2021, page 4

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.5 Page 1 of 2

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

Reference:

Exh A/Tab 2/Sch 1, p.4

#### Preamble:

Enbridge Gas states that construction of the Project is planned to commence in April 2022 and is expected to be placed into service by September 30, 2022. To meet construction timelines, Enbridge Gas requests OEB approval of its application by March 24, 2022.

### Question:

Please comment on the implications for the Project if Enbridge Gas does not receive approval from the OEB by March 24, 2022. What is the latest time by which approval from the OEB is required in order to meet the construction timelines?

### Response

Project construction must be conducted when the reef pressure in the storage pools is suitably low, which occurs when storage withdrawal operations have ceased and before injection operations commence. This timeframe typically begins in April each year but may vary based on several factors including the weather, storage inventory levels throughout the winter, and demand for storage withdrawals or injections in late Winter and early Spring.

The MNDMNRF must approve the drilling application before Enbridge Gas can begin drilling TKC 69. Based on the Company's experience with past drilling applications, it is anticipated that it will take approximately 3 - 4 weeks to receive a drilling permit from the MNDMNRF after the OEB has provided a favourable report. To meet construction timelines set out in Exhibit C, Tab 1, Schedule 1, Attachment 12, Enbridge Gas respectfully requests the approval of this application as soon as possible and not later than March 24, 2022. If Enbridge Gas does not receive approval of this application by

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.5 Page 2 of 2

the OEB and a drilling permit for TKC 69 from the MNDMNRF during this proposed timeframe, construction of the Project will likely need to be deferred to 2023.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.6 Page 1 of 2

### ENBRIDGE GAS INC.

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

Reference:

Exh E/Tab1/Sch 1/p.3

#### Preamble:

Enbridge Gas states that the following technical information was provided to the Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNRF) for the proposed drilling operation and for the proposed elevation of the MOP:

- Engineering studies completed by Geofirma confirming that the maximum safe operating pressure exceeds 16.5 kPa/m (0.73 psi/ft) for the Dow Moore storage pool and 17.2 kPa/m (0.76 psi/ft) for the Payne Storage pool.
- An Assessment of Neighbouring Activities for the Dow Moore storage pool, the Payne storage pool and the South Kimball storage pool as prescribed by Clause 5.2 of CSA Z341.1-18, assessing: a) wells within 1 kilometre; b) operations within 5 kilometre; and c) the integrity of all wells penetrating the storage zone
- "What If" Analysis of hazards and operability for each of the pools

As a condition of approval in past proceedings, the OEB has required that the applicant conform with the relevant requirements of the Canadian Standards Authority (CSA) Standard Z341 – *Storage of Hydrocarbons in Underground Formations* to the satisfaction of the MNDMNRF. In its application, Enbridge Gas has acknowledged this requirement.

### Question:

- a) What is the anticipated timeline for MNDMNRF's review and provision of its comments and conclusion on compliance with CSA Z341?
- b) Has Enbridge Gas had any discussions with the MNDMNRF in this regard? If so, please provide a summary of those discussions.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.6 Page 2 of 2

c) Does Enbridge Gas have any objection to the OEB imposing a condition of approval that requires Enbridge Gas to conform to the relevant requirements of CSA Z341 to the satisfaction of the MNDMNRF? If so, please explain Enbridge Gas's opposition to such a condition.

### Response

- a) Enbridge Gas is unaware of the timeline for MNDMNRF's review and provision of its comments and conclusion on compliance with CSA Z341. Enbridge Gas has offered to meet with MNDMNRF to discuss this Project as well as other upcoming projects. This correspondence can be found at Exhibit E, Tab 1, Schedule 1, Attachments 2 and 3. The Company has not received a request from MNDMNRF for meetings, discussions, or further information related to the Project.
- b) There have been no meetings or discussions with MNDMNRF related to the Project.
- c) Enbridge Gas does not have any objection to the OEB imposing such a condition.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.7 Page 1 of 1 Plus Attachment

### ENBRIDGE GAS INC.

# Answer to Interrogatory from OEB Staff ("STAFF")

### <u>INTERROGATORY</u>

Reference:

Exh F/Tab 1/Sch 1/p.2

### Preamble:

An Environmental Report (ER) for the Project was provided to the Ontario Pipeline Coordinating Committee (OPCC) and other applicable agencies on August 23, 2021. Enbridge Gas provided comments from the Ministry of the Transportation.

### Question:

Please file an update of the comments (in tabular format) that Enbridge Gas received as part of the OPCC review and in any public consultation since the application was filed. Please include the dates of communication, the issues and concerns identified by the parties, as well as Enbridge Gas's responses and actions to address these issues and concerns.

### Response

Please see Attachment 1 to this response.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 1 of 13

# Enbridge Gas 2022 Storage Enhancement Project Correspondence Tracking - Post Environmental Report Submission Ontario Pipeline Coordinating Committee (OPCC)

	Ontario Pipeline Coordinating Committee (OPCC)						
N/A - Not Available							
Comment Number	Stakeholder Group	Stakeholder Representative Name	Method of Communication	Date of Communication	Summary of Comment	Date of Response	Summary of Response
1	All OPCC, Agency, and Municipal contacts on the Project's Contact Lists.	N/A	Email	8/23/2021	On behalf of Enbridge Gas, Stantec emailed a notice of the Environmental Report and a link to the Report, with a request for comments to be submitted by October 4, 2021.	N/A	N/A
2	Policy Lead, Ministry of Government and Consumer Services OPCC Member	Uyen Ha	Email	8/24/2021	Uyen Ha informed Stantec that Infrastructure Ontario will provide a letter of acknowledgement once the Report has been reviewed.	8/24/2021	Stantec thanked Uyen Ha for their email.
3	Program Analyst Ministry of Transportation (MTO)	Amanda Rodek	Email	9/29/2021	The MTO informed Zora Crnojacki, OPCC Project Advisor, that the proposed project and study area are outside of MTO's permit control area and therefor MTO has no comment.	N/A	N/A
4	Team Lead, Heritage Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI)	Karla Barboza	Email	10/15/2021	Karla Barboza responded to the Notice of Commencement sent to Dan Minkin and requested confirmation on if archaeological assessments and/cultural heritage assessment have been undertaken to date for the Project.	10/15/2021	Stantec confirmed that the "Stage 1-2 Archaeological Assessment: 2022 Storage Enhancement Project - Kimball-Colinville Designated Storage Area & Proposed Location of TKC 69, Part of Lot 18, Concession 5, Geographic Township of Moore, now Township of St. Clair, Lambton County, Ontario ", dated Oct 1, 2021, was filed with MHSTCI Toronto Office on Oct 4, 2021. The MHSTCI Project Information Form Number is P256-0695-2021 and the MHSTCI File Number was provided to the Ministry. Stantec further confirmed that archaeology work at the Payne Project location is underway and a Stage 1-2 Report has not yet been filed.  MHSTCI was also notified that a screening for built heritage resources and cultural heritage landscapes in the Project's Study Areas was conducted. The screening identified that in no portion of the Study Areas contains known or recognized cultural heritage value, nor the potential for cultural heritage value.
							10/15/21 MHSTCI responded to Stantec and noted that the results of the Stage 1-2 Archaeological Assessment should be summarized in the Report and that the Report should also include the completed checklist on known or potential cultural heritage resources. MHSTCI further advised that Karla Barboza, Team Lead, and Laura Romeo, Heritage Planner, should be contacted on the Project.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 2 of 13

OPCC Correspondence Tracking - Comment #1

Letter submitted to Agencies



Stantec Consulting Ltd.
100-300 Hagey Blvd, Waterloo, ON N2L 0A4



August 23, 2021

«FIRST\_NAME» «SURNAME»
«POSITION»
«ORGANIZATION»
«DEPARTMENT»
«ADDRESS»
«CITYTOWN» «PROVINCE» «POSTAL\_CODE»
«EMail»

«TITLE» «FIRST NAME» «SURNAME»,

Reference: Enbridge Gas Inc. - 2022 Storage Enhancement Project

Enbridge Gas Inc. (Enbridge Gas) has identified the need to enhance the capacity and deliverability of their existing Enbridge Gas storage operations in Lambton County. The 2022 Storage Enhancement Project (the Project) will involve increasing the Maximum Operating Pressure (MOP) of the Dow Moore and Payne Storage Pools – two designated storage areas (DSAs) as defined in s.36.1(1)(a) of the Ontario Energy Board Act. To complete wellhead upgrades and pressure testing of wells at the Payne Storage Pool Project location, temporary steel plates will be used upon access to the sites' natural gas storage wells. No other temporary or permanent access road or structure will be installed at the Dow Moore Storage Pool Project location.

The Project will also involve drilling for a new natural gas storage well (TKC 69) in the Kimball-Colinville Storage Pool DSA. The Project will commence with the construction of a temporary gravel drilling pad that will be approximately 8100 square metres. Upon completion of drilling activities, approximately 85 metres of Nominal Pipe Size (NPS) 10-inch pipeline will be installed from the well to the Kimball-Colinville Storage Pool gathering system and a permanent gravel pad will be constructed around the well. The permanent well pad will be approximately 60 square metres. A permanent access laneway to the well will also be installed.

Enbridge Gas retained Stantec Consulting Ltd. (Stantec) to undertake an Environmental Study of the construction and operation of the Project. The Environmental Study is intended to fulfill the requirements of the Ontario Energy Board's (OEB) "Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition (2016)".

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 3 of 13

OPCC Correspondence Tracking - Comment #1

August 23, 2021 «FIRST\_NAME» «SURNAME» Page 2 of 2

Reference: Enbridge Gas Inc. – 2022 Storage Enhancement Project

An Environmental Report (ER), summarizing the results of the Environmental Study, is enclosed for your review. Please forward any comments you may have regarding the ER and Project to the undersigned. Your comments would be appreciated by **October 4, 2021**.

Yours truly,

**Stantec Consulting Ltd.** 

Kayla Ginter M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting Direct: 226-980-5347 Kayla.Ginter@stantec.com

Attachment: 2022 Storage Enhancement Project Environmental Report

c. Evan Tomek, St. Analyst, Environmental, Enbridge Gas

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 4 of 13

OPCC Correspondence Tracking - Comment #1

Letter submitted to OPCC members



Stantec Consulting Ltd. 100-300 Hagey Blvd, Waterloo, ON N2L 0A4



August 23, 2021

«FIRST\_NAME» «SURNAME»
«POSITION»
«ORGANIZATION»
«DEPARTMENT»
«ADDRESS»
«CITYTOWN» «PROVINCE» «POSTAL\_CODE»
«EMail»

«TITLE» «FIRST NAME» «SURNAME»,

Reference: Enbridge Gas Inc. – 2022 Storage Enhancement Project

Enbridge Gas Inc. (Enbridge Gas) has identified the need to enhance the capacity and deliverability of their existing Enbridge Gas storage operations in Lambton County. The 2022 Storage Enhancement Project (the Project) will involve increasing the Maximum Operating Pressure (MOP) of the Dow Moore and Payne Storage Pools – two designated storage areas (DSAs) as defined in s.36.1(1)(a) of the Ontario Energy Board Act. To complete wellhead upgrades and pressure testing of wells at the Payne Storage Pool Project location, temporary steel plates will be used upon access to the sites' natural gas storage wells. No other temporary or permanent access road or structure will be installed at the Dow Moore Storage Pool Project location.

The Project will also involve drilling for a new natural gas storage well (TKC 69) in the Kimball-Colinville Storage Pool DSA. The Project will commence with the construction of a temporary gravel drilling pad that will be approximately 8100 square metres. Upon completion of drilling activities, approximately 85 metres of Nominal Pipe Size (NPS) 10-inch pipeline will be installed from the well to the Kimball-Colinville Storage Pool gathering system and a permanent gravel pad will be constructed around the well. The permanent well pad will be approximately 60 square metres. A permanent access laneway to the well will also be installed.

Enbridge Gas retained Stantec Consulting Ltd. (Stantec) to undertake an Environmental Study of the construction and operation of the Project. The Environmental Study is intended to fulfill the requirements of the Ontario Energy Board's (OEB) "Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition (2016)".

An Environmental Report (ER), summarizing the results of the Environmental Study, is enclosed for your review. If you wish to receive a hardcopy of the ER, please feel free to contact the undersigned.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 5 of 13

OPCC Correspondence Tracking - Comment #1

August 23, 2021 «FIRST\_NAME» «SURNAME» Page 2 of 2

Reference: Enbridge Gas Inc. – 2022 Storage Enhancement Project

Please forward any comments you may have regarding the ER and Project to Zora Crnojacki, Chairperson, Ontario Pipeline Coordination Committee, Ontario Energy Board, 2300 Yonge Street, 26<sup>th</sup> Floor, P.O. Box 2319, Toronto, ON M4P 1E4, Zora.Crnojacki@oeb.gov.on.ca and the undersigned. Your comments would be appreciated by **October 4, 2021**.

Yours truly,

**Stantec Consulting Ltd.** 

Kayla Ginter M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting Direct: 226-980-5347 Kayla.Ginter@stantec.com

Attachment: 2022 Storage Enhancement Project Environmental Report

c. Evan Tomek, St. Analyst, Environmental, Enbridge Gas

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 6 of 13

OPCC Correspondence Tracking - Comment #2

 From:
 Ha, Uyen (MGCS)

 To:
 Ginter, Kayla

 Cc:
 Knight, Mark

**Subject:** RE: Enbridge Gas Inc. – 2022 Storage Enhancement Project Environmental Report

**Date:** Tuesday, August 24, 2021 9:34:54 AM

Thank you Kayla. Once we review, Infrastructure Ontario will be sending an acknowledgement letter.

From: Ginter, Kayla < Kayla. Ginter@stantec.com>

**Sent:** August-23-21 4:52 PM

**To:** Ha, Uyen (MGCS) < Uyen. Ha@ontario.ca> **Cc:** Knight, Mark < Mark. Knight@stantec.com>

**Subject:** Enbridge Gas Inc. – 2022 Storage Enhancement Project Environmental Report

### CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon,

Enbridge Gas Inc. (Enbridge Gas) has identified the need to enhance the capacity and deliverability of their existing Enbridge Gas storage operations in Lambton County. The 2022 Storage Enhancement Project (the Project) will involve increasing the Maximum Operating Pressure (MOP) of the Dow Moore and Payne Storage Pools – two designated storage areas (DSAs) as defined in s.36.1(1)(a) of the *Ontario Energy Board Act*. The Project will also involve drilling for a new natural gas storage well (TKC 69) in the Kimball-Colinville Storage Pool DSA and will involve the installation of approximately 85 metres of Nominal Pipe Size (NPS) 10-inch pipeline.

Enbridge Gas, retained Stantec to undertake an environmental study for the construction and operation of the Project. An Environmental Report (ER), summarizing the results of the environmental study, is enclosed at the FTP file link (below) for your review.

Please forward any comments you may have regarding the ER and Project to Zora Crnojacki, Chairperson, Ontario Pipeline Coordination Committee, Ontario Energy Board, 2300 Yonge Street, 26th Floor, P.O. Box 2319, Toronto, ON M4P 1E4, <a href="mailto:Zora.Crnojacki@oeb.gov.on.ca">Zora.Crnojacki@oeb.gov.on.ca</a> and the undersigned. Your comments would be appreciated by October 4, 2021.

### **Login Information**

Browser link: <a href="https://tmpsftp.stantec.com">https://tmpsftp.stantec.com</a>

**Login name:** s0902121436

**Password:** 9518079

Regards,

**Kayla Ginter** M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting

Direct: 226-980-5347 Kayla.Ginter@stantec.com

Stantec

300W-675 Cochrane Drive Markham ON L3R 0B8

OPCC Correspondence Tracking - Comment #2
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Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 8 of 13

OPCC Correspondence Tracking - Comment #3

 From:
 Rodek, Amanda (MTO)

 To:
 Zora.Crnojacki@oeb.gov.on.ca

Cc: <u>Ginter, Kayla</u>

Subject: RE: Enbridge Gas Inc. – 2022 Storage Enhancement Project Environmental Report

**Date:** Monday, September 27, 2021 8:15:23 AM

#### Hi Zora,

Stantec's, August 23, 2021 letter to Tony Di Fabio regarding the Enbridge Gas Inc. – 2022 Storage Enhancement Project Environmental Report, has been forwarded to my attention for review and response.

Please find the following comments from the Ministry of Transportation for your consideration regarding the proposed project:

 the proposed project and study area are outside of MTO's permit control area and therefor MTO has no comment

Have a great day!

Thanks.

Amanda Rodek
Program Analyst
Ministry of Transportation
Corridor Management Office
301 St. Paul Street
St. Catharines, ON L2R 7R4
Tel. (905) 704-2916

**From:** Ginter, Kayla < <u>Kayla.Ginter@stantec.com</u>>

**Sent:** August-23-21 4:52 PM

**To:** Di Fabio, Tony (MTO) < <a href="mailto:Tony.DiFabio@ontario.ca">Tony.DiFabio@ontario.ca</a>>

Cc: Knight, Mark < Mark. Knight@stantec.com >

**Subject:** Enbridge Gas Inc. – 2022 Storage Enhancement Project Environmental Report

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon,

Enbridge Gas Inc. (Enbridge Gas) has identified the need to enhance the capacity and deliverability of their existing Enbridge Gas storage operations in Lambton County. The 2022 Storage Enhancement Project (the Project) will involve increasing the Maximum Operating Pressure (MOP) of the Dow Moore and Payne Storage Pools – two designated storage areas (DSAs) as defined in s.36.1(1)(a) of the *Ontario Energy Board Act*. The Project will also involve drilling for a new natural gas storage well (TKC 69) in the Kimball-Colinville Storage Pool DSA and will involve the installation of approximately 85 metres of Nominal Pipe Size (NPS) 10-inch pipeline.

Enbridge Gas, retained Stantec to undertake an environmental study for the construction and operation of

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OPCC Correspondence Tracking - Comment #3

the Project. An Environmental Report (ER), summarizing the results of the environmental study, is enclosed at the FTP file link (below) for your review.

Please forward any comments you may have regarding the ER and Project to Zora Crnojacki, Chairperson, Ontario Pipeline Coordination Committee, Ontario Energy Board, 2300 Yonge Street, 26th Floor, P.O. Box 2319, Toronto, ON M4P 1E4, <a href="mailto:Zora.Crnojacki@oeb.gov.on.ca">Zora.Crnojacki@oeb.gov.on.ca</a> and the undersigned. Your comments would be appreciated by October 4, 2021.

### **Login Information**

Browser link: <a href="https://tmpsftp.stantec.com">https://tmpsftp.stantec.com</a>

**Login name:** s0902121436

**Password:** 9518079

Regards,

Kayla Ginter M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting

Direct: 226-980-5347 Kayla.Ginter@stantec.com

Stantec 300W-675 Cochrane Drive Markham ON L3R 0B8



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OPCC Correspondence Tracking - Comment #4

From: Barboza, Karla (MHSTCI)

To: <u>Ginter, Kayla</u>

Cc: Minkin, Dan (MHSTCI); Knight, Mark; Romeo, Laura (MHSTCI)

Subject: RE: Enbridge Gas Inc. – Notice of Study Commencement for the 2022 Storage Enhancement Project

**Date:** Friday, October 15, 2021 12:12:27 PM

Hi Kayla,

I did advise our contact info on two other projects (Greenstone and Coveny/Kinball-Colinville) but haven't seen anything for this one, but not too worry. I also contacted OEB (Zora) to update our contact on the OPCC list. Any initial notices should be sent to my attention

So for the 2020 Storage Enhancement Project (MHSTCI File 0015044), could you please remove Dan and include both Laura Romeo and I?

- Karla Barboza, Team Lead Heritage (Acting) | Heritage Planning Unit (Heritage, Sport, Tourism and Culture Industries) | 416-660-1027 | karla.barboza@ontario.ca
- Laura Romeo, Heritage Planner | Heritage Planning Unit (Heritage, Sport, Tourism and Culture Industries) | <u>Laura.Romeo@ontario.ca</u>

Thanks for the update on this project.

### Archaeological Resources

The results of the Stage 1-2 AA will inform the OEB and shall be summarized in the Environmental Report. If the Stage 1 AA recommends further AA(s), then MHSTCI recommends that further stages of AA be completed as early as possible during the design phase of the project, and prior to the completion of detailed design.

The Environmental Report must include specific information from the AA report(s). The Executive Summary of each AA report provides a brief summary of the work completed and the recommendations for next steps, whether for further archaeological assessment, in which case the report will include a map that identifies those areas, or for no further assessment. The Environmental Report must also include clear commitments to undertake any further AA stages recommended, and a timeline for their completion.

### Built Heritage Resources and Cultural Heritage Landscapes

If screening has identified no known or potential cultural heritage resources, or no impacts to these resources, please include the completed checklist and supporting documentation in the Environmental Report.

Thank you for consulting MHSTCI on this project and please continue to do so throughout the OEB process. We look forward to reviewing the Environmental Report. If you have any questions or require clarification, please do not hesitate to contact us.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 11 of 13

OPCC Correspondence Tracking - Comment #4

Thanks again, Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage
Ministry of Heritage, Sport, Tourism and Culture Industries
Heritage, Tourism and Culture Division | Programs and Services Branch | Heritage Planning Unit
T. 416. 660.1027 | Email: karla.barboza@ontario.ca

From: Ginter, Kayla < Kayla. Ginter@stantec.com>

Sent: October-15-21 11:20 AM

**To:** Barboza, Karla (MHSTCI) < Karla.Barboza@ontario.ca>

**Cc:** Minkin, Dan (MHSTCI) <Dan.Minkin@ontario.ca>; Knight, Mark <Mark.Knight@stantec.com> **Subject:** RE: Enbridge Gas Inc. — Notice of Study Commencement for the 2022 Storage Enhancement

Project

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Good Morning Karla,

Thank you for your email. I am aware of Dan's temporary absence. I had reached out to MHSTCI to confirm who we should be mailing notices to as part of the OPCC review process while Dan is away but have not heard a response back. I appreciate you reaching out.

Stantec is currently undertaking archaeology work at the TKC 69 and Payne Project Location.

The "Stage 1-2 Archaeological Assessment: 2022 Storage Enhancement Project - Kimball-Colinville Designated Storage Area & Proposed Location of TKC 69, Part of Lot 18, Concession 5, Geographic Township of Moore, now Township of St. Clair, Lambton County, Ontario ", dated Oct 1, 2021, was filed with MHSTCI Toronto Office on Oct 4, 2021. The MHSTCI Project Information Form Number is P256-0695-2021 and the MHSTCI File Number is 0015044.

Archaeology work at the Payne Project location is underway and a Stage 1-2 Report has not yet been filed.

A screening for built heritage resources and cultural heritage landscapes in the Project's Study Areas was conducted. The screening identified that in no portion of the Study Areas contains known or recognized cultural heritage value, nor the potential for cultural heritage value. There is also no local or Indigenous knowledge, or accessible documentation, suggesting the Study Areas are considered a landmark in the local community, contains structures or sites important in defining the character of the area, has a special association with a community, person, or historical event, or contains or is a part of a cultural heritage landscape.

Please let me know if you have any questions on the above.

Have a nice day,

**Kayla Ginter** M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting

Direct: 226-980-5347 Kayla.Ginter@stantec.com

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From: Barboza, Karla (MHSTCI) < Karla. Barboza@ontario.ca>

**Sent:** Friday, October 15, 2021 10:42 AM **To:** Ginter, Kayla < <u>Kayla.Ginter@stantec.com</u>>

Cc: Knight, Mark < Mark. Knight@stantec.com >; Minkin, Dan (MHSTCI) < dan.minkin@ontario.ca >

Subject: FW: Enbridge Gas Inc. – Notice of Study Commencement for the 2022 Storage

**Enhancement Project** 

Hi Kayla and Mark,

It seems that this notice was sent to Dan Minkin in error while he was on leave (until this Tuesday). Before we formally respond it to you, could you please advise whether archaeological assessments and/cultural heritage assessment have been undertaken to date? If archaeological assessment(s) have been undertaken, could you please send me the Project Information Form number.

#### Thanks in advance,

Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage
Ministry of Heritage, Sport, Tourism and Culture Industries
Heritage, Tourism and Culture Division | Programs and Services Branch | Heritage Planning Unit
T. 416. 660.1027 | Email: karla.barboza@ontario.ca

**From:** Ginter, Kayla < <u>Kayla.Ginter@stantec.com</u>>

**Sent:** July 23, 2021 5:19 PM

To: Minkin, Dan (MHSTCI) < <a href="mailto:Dan.Minkin@ontario.ca">Dan.Minkin@ontario.ca</a>>

Cc: Knight, Mark < <a href="Mark.Knight@stantec.com">Mark.Knight@stantec.com</a>>

Subject: Enbridge Gas Inc. - Notice of Study Commencement for the 2022 Storage Enhancement

Project

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Good Afternoon,

Attached please find a Notice of Study Commencement for the Enbridge Gas Inc. 2022 Storage Enhancement Project.

Regards,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.7, Attachment 1, Page 13 of 13

OPCC Correspondence Tracking - Comment #4

**Kayla Ginter** M.ES. (Planning), OPPI Candidate Environmental Coordinator, Assessment and Permitting

Direct: 226-980-5347 Kayla.Ginter@stantec.com

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### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

Reference:

Exh F/Tab 1/Sch 1/p.2,3

### Preamble:

The application states that a Stage 1 and 2 Archaeological Assessment (AA) was completed on the proposed work area for well TKC 69 on September 7, 2021 and no archaeological resources were identified. It is also stated that the AA will continue on lands disturbed by the Project in the Fall of 2021 and a clearance letter from the Ministry of Heritage, Sport, Tourism and Cultural Industries (MHSTCI) will be obtained prior to construction.

### Question:

- a) Please provide details of the ongoing AA work and when Enbridge Gas expects that this work will be completed.
- b) Please confirm whether Stage 1 and 2 AA reports have been submitted to the MHSTCI for review.
- c) When does Enbridge Gas expect to receive a clearance letter from MHSTCI?
- d) Please indicate the timeline by which Enbridge Gas must receive AA approval from the MHSTCI to start the Project on time.

#### Response

a) There are three properties that will be disturbed by the proposed project activities that require an AA: the work area for well TKC 69 and two properties located within in the Payne Storage Pool. At the time this application was submitted to the OEB, an AA was completed on the work area for well TKC 69 and no archaeological resources were identified. Since the submission of this application, an AA was

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.8 Page 2 of 2

completed on one of the properties within the Payne Storage Pool on December 2, 2021 and no archaeological resources were identified. The AA on the second property within the Payne Storage Pool is expected to be completed in January 2022, subject to weather and land conditions providing suitable soil visibility for the work to be conducted.

- b) A Stage 1 and 2 AA report for the work area for well TKC 69 was submitted to the MHSTCI for review on October 1, 2021. A Stage 1 and 2 AA report for the first property within the Payne Storage Pool will be submitted to the MHSTCI for review in January 2022. The Stage 1 and 2 AA report for the second property within the Payne Storage Pool, discussed in part a) above, will be submitted approximately three weeks after the AA has been completed.
- c) Enbridge Gas received a clearance letter from the MHSTCI on October 4, 2021 for the proposed work area for well TKC 69. Enbridge Gas expects to receive clearance letters for the remaining AA reports by the end of Q1 2022.
- d) Enbridge Gas must receive the remaining AA approvals from the MHSTCI for the two properties within the Payne Storage Pool by the end of Q1 2022 to maintain the proposed construction schedule for the Project.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.9 Page 1 of 2

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### **INTERROGATORY**

### Reference:

Exh H/Tab 1/Sch 1/Att 1/p. 12,13

### Preamble:

Table 1.1 of the ER lists a number of potential environmental permits and approval requirements for the Project.

### Question:

Please provide a status update on each of the environmental permits or approvals required for the Project.

### Response

Table 1 below outlines the potential environmental permits and approvals identified in the ER and the current status of these permits and approvals.

### Table 1

Permit/Approval Name	Administering Agency	Status
Development Permits under Ontario Regulation (O. Reg.) 171/06 (Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses), as per the Conservation Authorities Act (1990)	St. Clair Region Conservation Authority (SCRCA)	Permit received on November 17, 2021

Permit/Approval Name	Administering Agency	Status
Permit to Take Water (PTTW) or Environmental Activity and Sector Registry (EASR) (surface and groundwater) under the <i>Ontario</i> <i>Water Resources Act</i> (1990)	MECP	Not required as dewatering activities will be below the 50,000 L/day threshold
Permitting or registration under the Endangered Species Act (ESA) (2007)	MECP	Not required as no suitable SAR habitat is located within the Project area
Archaeological clearance under the Ontario Heritage Act (OHA) (1990)	MHSTCI	See response at Exhibit I.STAFF.8
Review of Built Heritage and Cultural Landscapes under the OHA (1990)	MHSTCI	Review completed and described in section 3.5.9 of the ER – no portion of study areas contain potential, known or recognized cultural heritage value
Noise By-Law No. 44 of 2014	St. Clair Township	See note 1 below
Woodlands Conservation By-Law No. 4 of 2012	Lambton County	Not required as the Project does not require tree removal

Note 1: The Township of St. Clair maintains By-Law 44 of 2014, "for regulating and prohibiting within the Township of St. Clair noise or noises likely to disturb inhabitants". The By-Law is qualitative in nature and does not provide any quantitative guidelines with respect to noise, leaving judgement to the discretion of regulatory enforcement officials. There is no mechanism to obtain a permit or pre-approval for compliance with this By-Law. In lieu of a permit, Enbridge Gas commits to actions that will reduce noise and vibration from the Project construction activities, including:

- i. Placement of sea cans (steel shipping containers) between the drilling rig and the surrounding properties, to act as both sound and visual barriers;
- ii. Installation of hospital grade mufflers on equipment to reduce sound levels; and
- iii. Installation of rubber mats under the rig pumps and generator to reduce vibration.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.10 Page 1 of 3 Plus Attachments

### **ENBRIDGE GAS INC.**

# Answer to Interrogatory from OEB Staff ("STAFF")

### INTERROGATORY

Reference:

Exh H/Tab 1/Sch 1/p.1,2

### Preamble:

The Ministry of Energy (MOE) identified five Indigenous communities<sup>2</sup> that Enbridge Gas should consult in relation to the Project.

Enbridge Gas provided the MOE with its Indigenous Consultation Report for the Project and is awaiting a letter of opinion from the MOE regarding the adequacy of procedural aspects of the duty to consult.

### Question:

- a) Please provide an update on Indigenous consultation activities since the application was filed.
- b) Please summarize all the issues and concerns raised by the Indigenous communities in the process of Indigenous consultation to date and describe Enbridge Gas's plans, actions, and commitments to address these concerns and resolve the outstanding issues.
- c) Please update the evidence with any correspondence between the MOE and Enbridge Gas since the application was filed, regarding the MOE's review of Enbridge Gas's consultation activities.
- d) Please indicate when Enbridge Gas expects to receive a letter of opinion from the MOE.

<sup>&</sup>lt;sup>2</sup> Aamjiwnaang First Nation, Bkejwanong (Walpole Island First Nation), Chippewas of the Thames First Nation, Chippewas of Kettle and Stony Point, Oneida Nation of the Thames

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.10 Page 2 of 3 Plus Attachments

### Response

- a) Please see Attachment 1 to this response for a summary of all Indigenous consultation activities related to the Project, including updates since the application was filed.
- b) No Project-specific issues or concerns have been raised by Indigenous groups. However, During the meeting with Walpole Island First Nation ("WIFN") on November 15, 2021, the WIFN representative made reference to the Chenail Ecarte Reserve and their ongoing asserted land claim territory within the proposed Project area. This issue was also discussed during consultation activities for Enbridge Gas's 2021-2022 Storage Enhancement Project.<sup>3</sup>

On April 26, 2000, WIFN filed a Statement of Claim regarding its land claim in the Ontario Superior Court of Justice against the Attorney General of Canada and Her Majesty the Queen in Right of Ontario, Action No. 00-CV-189329 ("Action"). WIFN provided Enbridge Gas with a copy of the Statement of Claim as well as an Order dated March 26, 2019 ("Order"), which provides that, by way of consent, the parties to the Action agreed to put the Action in abeyance to allow for negotiations in relation to the issues outlined in the Statement of Claim. The Order explains that the matter before the court deals with unextinguished Aboriginal title and rights over a large area of southern Ontario including navigable waters. It is a complex matter and covers a large historical timeframe which would require an extensive amount of preparation before trial. As such, entering into negotiations is a more effective and efficient way to resolve the pending litigation. WIFN has advised Enbridge Gas representatives that both the federal and provincial governments have not taken steps to negotiate a resolution of the Action. WIFN has advised that until the governments take positive steps to resolve the Action, they will not deem any project consultation within their asserted traditional territory to be adequate.

Enbridge Gas considers the issues set out in the Statement of Claim to be a government to government discussion between WIFN and Canada.

Enbridge Gas respects the assertion of rights over the traditional territory and will continue to consult and engage with WIFN based on their asserted rights.

c) Attachment 2 to this response contains email correspondence between Enbridge Gas and MOE related to the MOE's review of consultation activities for the Project.

<sup>&</sup>lt;sup>3</sup> EB-2020-0256, Exhibit I.STAFF.8b).

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.10 Page 3 of 3 Plus Attachments

d) At this time Enbridge Gas is not aware of the MOE's timeline to provide a letter of opinion on the adequacy of procedural aspects of Indigenous consultation undertaken by Enbridge Gas for the Project.

### INDIGENOUS CONSULTATION REPORT: LOG AND PROJECT CORRESPONDENCE

As of January 5, 2022

Line	Date of	Method of	Summary of Engagement Activity	Response from	Attachment
Item	Engagement	Engagement		Community/Outstanding Issues	
1.1	June 8, 2021	Email	An Enbridge Gas representative notified an AFN representative of the 2022 Storage Enhancement Project ("Project"). The Project notification letter included a map and description of the Project.	No response received from AFN representative.	Attachment 1.1
1.2	June 18, 2021	Email	An Enbridge Gas representative emailed the AFN representative to set up a date to meet regarding the Project as well as other Enbridge Gas projects.	After numerous emails back and forth, the representatives agreed that Enbridge Gas would present to the Environmental Committee on September 14.	Attachment 1.2
1.3	July 29, 2021	Email	An Enbridge Gas representative emailed the AFN representative and provided a Notice of Study Commencement on the Project.	No response received from AFN representative.	Attachment 1.3
1.4	August 24, 2021	Email	An Enbridge Gas representative emailed the AFN representative requesting to move the September 14 meeting to early October due to the release of an Environmental Report related to another project.	The representatives agreed to defer the presentation for the Environmental Committee to October 5.	Attachment 1.4
1.5	August 26, 2021	Email	An Enbridge Gas representative emailed the AFN representative to advise that the Environmental Report was available and provided the internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by October 4, 2021, as per the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 7 <sup>th</sup> Edition 2016 ("Guidelines").	No response received from AFN representative.	Attachment 1.5
			The Enbridge Gas representative also indicated that a meeting was set on October 5, 2021 to provide the Environmental Committee with an opportunity to ask any questions and provide their views on the potential impact the Project may have on the community's rights and interests.		
1.6	October 5, 2021	Email	The AFN representative emailed the Enbridge Gas representative the Third-Party review of the Project's environmental report. The AFN representative inquired as to whether the costs could be reimbursed.	The Enbridge Gas representative responded on the same day to acknowledge the reports and also to advise that Enbridge Gas would cover the costs for the third-party review. The AFN representative advised they would provide a quote for Enbridge Gas's review.	Attachment 1.6
1.7	October 5,	Virtual	The Enbridge Gas representative and the	There were no Project-	Attachment

1.8	December 7.	Email	meeting to discuss proposed Enbridge Gas projects.  The Enbridge Gas representative provided information on the Project including the Species at Risk (SAR) and general mitigation for SAR.  The Enbridge Gas representative emailed	AFN environmental committee  The AFN representative	
	2021		the new AFN representative. The Enbridge Gas representative introduced themselves in the email and then provided the AFN log of engagement and Project Notification letter to the AFN representative. The Enbridge Gas representative also advised that the responses to the Environmental report review would be sent to them once complete.	acknowledged the email.	
Chipp	oewa of Kettle ar	nd Stony Point I	First Nation ("CKSPFN")		
Line Item	Date of Engagement	Method of Engagement	Summary of Engagement Activity	Response from Community/Outstanding Issues	Attachment
2.1	June 8, 2021	Email	An Enbridge Gas representative notified an CKSPFN representative of the Project. The Project notification letter included a map and description of the Project.	No response received from CKSPFN representative.	Attachment 2.1
2.2	July 5, 2021	Email	An Enbridge Gas representative emailed the CKSPFN representative requesting a meeting to discuss the Project and other proposed Enbridge Gas projects.	No response received from CKSPFN representative.	Attachment 2.2
2.3	July 29, 2021	Email	An Enbridge Gas representative emailed the CKSPFN representative and provided a Notice of Study Commencement on the Project.	On August 9, 2021, the KSPFN representative responded and provided some dates to meet to discuss the Project. The parties agreed to meet on September 9.	Attachment 2.3
2.4	August 26, 2021	Email	An Enbridge Gas representative emailed the CKSPFN representative to advise that the Environmental Report was available and provided the internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by October 4, 2021, as per the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 7 <sup>th</sup> Edition 2016 ("Guidelines").	No response received from the CKSPFN representative.	Attachment 2.4
2.5	Sept 7, 2021	Email	The Enbridge Gas representative emailed the CKSPFN representative to advise that they would not be able to travel to meet in person to discuss the Project. The Enbridge Gas representative advised they would still be able to meet on the telephone for the scheduled time or that they could reschedule to a better time.	The CKSPFN representative requested, and the parties agreed to meet September 15, 2021 by telephone.	Attachment 2.5
2.6	September 14, 2021	Email	The Enbridge Gas representative emailed the presentation deck to the CKSPFN ahead of the meeting scheduled for September 15.	The CKSPFN representative emailed in response to advise that we would need to postpone due to an appointment. The parties	Attachment 2.6

				agreed to meet on September 20.	
2.7	September 20, 2021	Telephone meeting	The Enbridge Gas representative and the CKSPFN representative met by telephone to discuss the current and proposed Enbridge Gas projects.  The Enbridge Gas representative provided information on the Project including the Species at Risk (SAR) and general mitigation for SAR.	The parties discussed CKSPFN capacity for Environment and Archaeological monitors for Projects. The CKSPFN representative advised that they only have one monitor available on an irregular basis. The Enbridge Gas representative advised CKSPFN that training for monitors could be accommodated to ensure that representatives from the community were present on projects.  The Enbridge Gas representative advised the CKSPFN representative that if they required a third party to review the Environment Reports on the Project, Enbridge Gas would be happy to accommodate this request.	Attachment 2.7
2.8	October 25, 2021	Email	An Enbridge Gas representative sent an email to the CKSPFN representative to touch base on the recent Enbridge Gas projects discussed in the September 20, 2021 meeting. The Enbridge Gas representative wanted to ensure that the CKSPFN representative was aware that capacity funding was available for a third-party review of the environmental reports.	The CKSPFN responded on October 26 to advise that they appreciated the email and advised that they would be in touch soon.	
2.9	December 8, 2021	Telephone	The Enbridge Gas representative was advised by Enbridge Gas Regulatory Affairs that CKSPFN had left a message on December 7 regarding the Project and had asked about intervenor status on the Project. The Enbridge Gas representative called the CKSPFN representative to discuss and learn more. The CKSPFN representative advised that the Consultation Committee had just been formed and had their second meeting that week. They were concerned about timing in voicing their comments on the 2022 Storage Enhancement Project. Enbridge Gas representative advised CKSPFN that their comments, concerns and questions were always welcomed and Enbridge Gas would continue to work with them on the project. Also advised CKSPFN of the process to be an intervenor if they wished to continue down that route. Followed up with an email to the CKSPFN representative.	The parties discussed a presentation in early 2022 to review all of Enbridge Gas's projects and discuss the Nations comments and concerns	
Chipp	ewas of the Tha	ames First Natio	on ("COTTFN")		
Line Item	Date of Engagement	Method of Engagement	Summary of Engagement Activity	Response from Community/Outstanding Issues	Attachment

3.1	September 15, 2021	Email	An Enbridge Gas representative emailed a COTTFN representative to confirm a date for a community visit to provide an update on Enbridge Gas projects.	No response was received from the COTTFN representative.	Attachment 3.1
3.2	September 19, 2021	Email	An Enbridge Gas representative sent the Notice of Study Commencement for the Project to the COTTFN consultation department and asked for a meeting in October to discuss the Project.	On September 27, 2021, the COTTFN representative acknowledged the email from the Enbridge Gas representative and advised that they would be on annual leave until October 18, 2021.	Attachment 3.2
3.3	September 19, 2021	Email	An Enbridge Gas representative emailed the COTTFN representative to advise that the Environmental Report was available and provided the Internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by October 4, 2021, as per the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 7th Edition 2016 ("Guidelines").	No response was received from the COTTFN representative.	Attachment 3.3
3.4	September 28, 2021	Email	An Enbridge Gas representative notified an COTTFN representative of the Project. The Project notification letter included a map and description of the Project.		Attachment 3.4
3.5	October 18, 2021	Email	An Enbridge Gas representative emailed the COTTFN representative asking to set up a meeting for October 21. The two parties went back and forth to set up a date to meet.	The meeting will take place on October 27, 2021 at COTTFN band office.	Attachment 3.5
3.6	October 27, 2021	In person meeting	An Enbridge Gas representative met with the COTTFN representatives to discuss the Project.  The Enbridge Gas representative provided information on the Project including the Species at Risk (SAR) and general mitigation for SAR.	COTTFN representatives had no concerns with respect to information provided on the Project.  COTTFN expressed an interest in future business opportunities with Enbridge Gas with	
3.7	October 29, 2021	Email	The Enbridge Gas representative emailed the COTTFN representative thanking them for the meeting on October 27. The COTTFN representative responded that they were reviewing the files and requested shapefiles for the Project.	respect to this and other upcoming projects.  On November 16, 2021, the Enbridge Gas representative responded advising that our Environmental consultant was working on making shapefiles for the Project.  On November 28, 2021, the Enbridge Gas representative sent the shape files to the	
3.8	November 16, 2021	Email	The Enbridge Gas representative emailed the COTTFN representative to provide the link to download the environmental report for the Project.	COTTFN representative.	
3.9	November 23, 2021	Email	The Enbridge Gas representative emailed the COTTFN representative to advise them that Enbridge Gas welcomes feedback and comments regarding environmental or archaeological reports at any time throughout a project. As the COTTFN		

			representative was new to the role, the Enbridge Gas representative wanted to ensure they were aware that Enbridge Gas appreciates the work in reviewing these reports and will always accept comments and respond to any concerns.		
Oneic	la Nation of the	Thames ("Onei	da Nation")		
Line Item	Date of Engagement	Method of Engagement	Summary of Engagement Activity	Response from Community/Outstanding Issues	Attachment
4.1	June 22, 2021	Email	An Enbridge Gas representative emailed the Oneida Nation representative to try to confirm a meeting with community representatives to provide an update on a variety of Enbridge Gas projects.	No response was received from the Oneida Nation representative.	Attachment 4.1
4.2	September 19, 2021	Email	An Enbridge Gas representative sent the Notice of Study Commencement for the Project to the Oneida Nation consultation coordinator in advance of an October community meeting.	The Oneida Nation representative emailed the Enbridge Gas representative that a meeting in early October could be accommodated.	Attachment 4.2
4.3	September 19, 2021	Email	An Enbridge Gas representative emailed the Oneida Nation representative to advise that the Environmental Report was available and provided the Internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by October 4, 2021, as per the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 7th Edition 2016 ("Guidelines").	No response was received from the Oneida Nation representative.	Attachment 4.3
4.4	September 28, 2021	Email	An Enbridge Gas representative notified an Oneida Nation representative of the Project. The Project notification letter included a map and description of the Project.	No response was received from the Oneida Nation representative.	
4.4	October 14, 2021	In person	An Enbridge Gas representative dropped off Project information at the Band office in hopes to connect with the Oneida Nation representative.	The Oneida Nation representative was not available that day and the Enbridge Gas representative sent an email on October 15, 2021 advising him that the package was at the band office.	Attachment 4.4
4.5	October 18, 2021	Email	An Enbridge Gas representative emailed the Oneida Nation representative to advise that the Environmental Report was available and provided the internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by November 26, 2021, as per the Guidelines.	No response was received from the Oneida Nation representative.	
4.6	November 4, 2021	Email	An Enbridge Gas representative received an email from the Oneida Nation representative requesting a virtual meeting with Oneida's leadership and environmental group.	The parties agreed to meet virtually on November 10, 2021.	

4.7	November 10, 2021	Virtual Meeting	An Enbridge Gas representative met virtually with the Oneida Nation representative to discuss the Project.  The Enbridge Gas representative presented general information on the Project as well as information on identification of Species at Risk (SAR) in the area and SAR mitigation measures.	The Oneida representatives asked what size and type of pipe was being used. The Enbridge Gas representative responded that it was a 10 inch steel pipe.  The Enbridge Gas representative plans to visit Oneida Nation the last week of November 2021.	
4.8	November 15, 2021	Email	An Enbridge Gas representative emailed the Oneida Nation representative to thank him for the opportunity to speak with representatives from Band Council and their Environmental Team.		

#### Walpole Island First Nation ("WIFN")

Line Item	Date of Engagement	Method of Engagement	Summary of Engagement Activity	Response from Community/Outstanding Issues	Attachment
5.1	June 8, 2021	Email	An Enbridge Gas representative notified an WIFN representative of Project. The Project notification letter included a map and description of the Project.	No response was received from WIFN representative.	Attachment 5.1
5.2	July 8, 2021	Email	An Enbridge Gas representative emailed a WIFN representative to inquire who should be receiving project notification in the absence of the WIFN representative.	The WIFN representative advised to continue to engage with the retired WIFN representative.	Attachment 5.2
5.3	July 13, 2021	Email	An Enbridge Gas representative emailed the WIFN representative requesting a meeting to discuss a number of Enbridge Gas projects.	A meeting date was set for July 23, 2021.	Attachment 5.3
5.4	July 23, 2021	Telephone meeting	The Enbridge Gas representative met with the WIFN representative to discuss the current Project and additional proposed Enbridge Gas projects.	No questions from the WIFN representative were raised at this time.  The Enbridge Gas representative advised that capacity funding could be provided to the community for the review of the Environmental Report once it has been completed.	Attachment 5.4
5.5	July 29, 2021	Email	An Enbridge Gas representative emailed the WIFN representative and provided a notice of commencement on the Project.	No response was received from the WIFN representative.	Attachment 5.5
5.6	August 26, 2021	Email	An Enbridge Gas representative emailed the WIFN representative to advise that the Environmental Report was available and provided the Internet link for the report. The Enbridge Gas representative requested that any comments be provided on the Environmental Report by October 4, 2021, as per the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 7th Edition 2016 ("Guidelines").  The Enbridge Gas representative also indicated that they would like to set up a	No response was received from WIFN representative.	Attachment 5.6

			meeting for early October to discuss the Project and have WIFN provide their views on the potential impact the Project may have on the community's rights and interests.		
5.7	September 10, 2021	Email	An Enbridge Gas representative emailed the WIFN representatives requesting a meeting to discuss current and proposed Enbridge Gas Projects.	No response was received from the WIFN representative.	Attachment 5.7
5.8	October 6, 2021	Email	An Enbridge Gas representative emailed the WIFN representative to provide the ER link on a different project and a reminder that the ER for the Project was available for review.	The WIFN representative responded that he has requested the third-party reviewer provide Enbridge Gas with a quote.  Quote was received and	Attachment 5.8
				approved on October 8, 2021.	
5.9	October 19, 2021	Email	An Enbridge Gas representative emailed the WIFN representative a Capacity Funding agreement letter for the Project for their review and signature.	No response was received.	Attachment 5.9
5.10	October 29, 2021	Email	An Enbridge Gas representative emailed the WIFN representatives to ask for a meeting to discuss the proposed Enbridge Gas projects.	No response was received.	
5.11	November 9, 2021	Email	Neegan Burnside, acting on behalf of WIFN sent an email to the Enbridge Gas representative providing comments on the Project.	The Enbridge Gas representative acknowledged the email.	
5.12	November 10, 2021	Email	The WIFN representative emailed the Enbridge Gas representative to ask for a meeting to discuss proposed Enbridge Gas projects.	A meeting was set for November 15, 2021. PowerPoint slides providing information was sent on November 12, 2021.	
5.13	November 15, 2021	Virtual Meeting	The Enbridge Gas representative and the WIFN representative met virtually to discuss the Project.  The Enbridge Gas representative provided information on the Project including the scope and potential Species at Risk (SAR).	The WIFN representative advised once the Enbridge Gas comments had been provided back to WIFN, a meeting would be set up to further discuss the Project.  The WIFN representative advised about their concerns with the Enbridge Gas Designated Storage Areas (DSA) as they assert subsurface mineral rights within the Chenail Ecarte reserve.	
5.14	November 18, 2021	Email	The Enbridge Gas representative emailed the WIFN representative to follow up on the meeting held on November 15, 2021. The Enbridge Gas representative provided a letter agreement for WIFN to confirm that capacity funding would be provided for the third-party review of the environmental report.	The Enbridge Gas representative received an out of office for the WIFN representative.	
5.15	December 13, 2021	Telephone and Email	The WIFN representative called the Enbridge Gas representative to advise of an interim staffing change.	The parties agreed to meet in the new year to discuss the ongoing Enbridge Gas Projects.	
5.16	December 14, 2021	Email	The Enbridge Gas representative emailed the WIFN representative to advise that Enbridge Gas was working to provide		

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 1, Page 8 of 8

	comments on all the environmental report responses received from WIFN and would send over when finalized.		
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Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 1 of 14

## 2022 STORAGE ENHANCEMENT EMAIL INTERACTION BETWEEN ENBRIDGE GAS AND THE MINISTRY OF ENERGY AS OF JANUARY 6, 2022

From: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Sent: October 27, 2021 11:15 AM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca >

Cc: Kevin Berube < kevin.berube@enbridge.com >; Catherine Pennington

<<u>Catherine.Pennington@enbridge.com</u>>; Dave Janisse <<u>Dave.Janisse@enbridge.com</u>>

Subject: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

## CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good morning Rosalind,

Hope this finds you keeping well. It's been awhile since we collaborated together so I look forward engaging with you on this Project.

Today our Regulatory team filed the application and evidence for the 2022 Storage Enhancement Project with the OEB. Please find attached a copy of the Indigenous Summary and Log/evidence for your review.

Please let us know if you have questions as you review and as always, happy to chat to discuss the Project and our engagement.

All the best and take care, Lauren Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 2 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Thursday, November 4, 2021 3:07 PM

To: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Subject: [External] RE: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

#### **CAUTION: EXTERNAL EMAIL**

This email originated from outside Enbridge and could be a phish. Criminals can pretend to be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Hi Lauren,

Are you available for a quick call before 5 p.m. today or sometime tomorrow?

No need to worry...I just have a few straightforward questions.

Thank you.

Rosalind

From: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Sent: November 4, 2021 3:08 PM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Subject: RE: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hey there,

I'm good from 9-10 tomorrow and in the afternoon too.

Does that work for you?

Thanks,

Lauren

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 3 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Friday, November 12, 2021 1:34 PM

To: Kevin Berube <kevin.berube@enbridge.com>

Subject: [External] 2022 Storage Enhancement Question

#### **CAUTION: EXTERNAL EMAIL**

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Hi Kevin.

I just wanted to check in with you to see if you know whether Oneida Nation of the Thames will be pursuing a third-party review of the ER like other communities?

Thank you.

Rosalind

From: Kevin Berube < kevin.berube@enbridge.com >

Sent: November 12, 2021 1:38 PM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Subject: Re: 2022 Storage Enhancement Question

### CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Rosalind. I met with Oneida on Wednesday regarding 2022 SE. They didn't indicate they were pursuing a third party review. We went over the species at risk that may be in that area, they were appreciative of the information.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 4 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Friday, November 12, 2021 1:40 PM

To: Kevin Berube <kevin.berube@enbridge.com>

Subject: [External] RE: 2022 Storage Enhancement Question

#### CAUTION: EXTERNAL EMAIL

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OK! Thanks, Kevin.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 5 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Monday, November 15, 2021 10:49 AM

To: Lauren Whitwham < Lauren. Whitwham@enbridge.com >; Kevin Berube

<kevin.berube@enbridge.com>

Subject: [External] Energy Projects General Feedback: Shapefiles

#### **CAUTION: EXTERNAL EMAIL**

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#### any suspicious emails.

Hello Lauren and Kevin,

The conversations are going well. I just wanted to check in about shapefiles. As you know, the Ministry of Energy requested that shapefiles be sent with the Project Description or as soon as possible afterwards (like, a day or two – in most cases). Indigenous Communities would find this very helpful, as well. Would Enbridge be able to adopt the same practice for Indigenous Communities?

Thank you for your consideration.

Sincerely,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 6 of 14

From: Lauren Whitwham <Lauren.Whitwham@enbridge.com>

Sent: November 15, 2021 10:52 AM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>; Kevin Berube

<kevin.berube@enbridge.com>

Subject: RE: Energy Projects General Feedback: Shapefiles

### CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Rosalind,

We have started into this process with our Regulatory team sending them to the MOE.

We can adapt it for Indigenous communities. I know that COTTFN has asked Kevin about them. If there are other Nations that would like them, we would be happy to supply.

Thanks, Lauren

From: Ashe. Rosalind (ENERGY)
To: Lauren Whitwham: Kevin Berube

Subject: [External] RE: Energy Projects General Feedback: Shapefiles

Date: Monday, November 15, 2021 10:54:47 AM

#### CAUTION: EXTERNAL EMAIL

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Thanks, Lauren.

Yes, it was COTTFN asking. I'll let you know if there are other requests. I'll check in with my team to see if this might be a good practice, across the board.

Sincerely,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 7 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Tuesday, November 16, 2021 5:01 PM
To: Kevin Berube < kevin.berube@enbridge.com >

Subject: [External] 2022 Storage Enhancement Question: ER Timeline

#### CAUTION: EXTERNAL EMAIL

This email originated from outside Enbridge and could be a phish. Criminals can pretend to be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Hi Kevin,

I just wanted to check in about the timeline for Chippewas of the Thames First Nation to review the Environmental Report for 2022 Storage Enhancement. Have you discussed an extended timeline? It seems that they received a lot of information at the same time.

Thank you.

Sincerely,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 8 of 14

From: Kevin Berube < kevin.berube@enbridge.com >

Sent: November 17, 2021 10:18 AM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca > Subject: RE: 2022 Storage Enhancement Question: ER Timeline

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Rosalind,

Jennifer is new to the environmental team at COTTFN. She has requested shapefiles on a number of our projects as well as the 2022 Storage Enhancement ER to bring herself up to speed on projects they're engaged with Enbridge on, so she's receiving a lot of information at once. Fallon Burch, the Consultation Coordinator, has been in receipt of the link to the 2022 Storage Enhancement ER since September 19. I'm happy to recommend an extension for COTTFN to review the ER with Jennifer recently joining their team.

Thanks, Kevin Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 9 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Wednesday, November 17, 2021 12:28 PM To: Kevin Berube <kevin.berube@enbridge.com>

Subject: [External] RE: 2022 Storage Enhancement Question: ER Timeline

#### **CAUTION: EXTERNAL EMAIL**

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Hi Kevin,

Thank you.

COTTFN said that the shapefiles would be very useful, in general, to streamline their process.

I understand that there was a lot of information coming at the same time. That said, I see that COTTFN was given from September 19 to October 4 to review the ER, whereas AFN was given from August 26 to October 4 to review the ER.

I understand that Jen is currently prioritizing the review of the ER and the progress of the review may naturally emerge in your next discussion with COTTFN.

I think that the comments about the shapefiles and the ER review timeline seem to be general 'process' suggestions to keep in mind for this project and future projects.

Sincerely,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 10 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Monday, November 22, 2021 3:18 PM

To: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Subject: [External] RE: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

#### **CAUTION: EXTERNAL EMAIL**

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Hi Lauren.

I was wondering whether you would have time for a quick chat about 2022 Storage Enhancement tomorrow? It's coming along well...I'm having a bit of difficulty contacting some of the communities...and I just wanted to see if there are any further updates before finalizing.

Sincerely,

Rosalind

From: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Sent: November 22, 2021 3:19 PM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Subject: RE: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi there,

Sounds great. I can do 8:15-10:00 or 12-2 if either of those times works for you.

Thanks,

Lauren

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 11 of 14

From: Ashe, Rosalind (ENERGY)
To: Lauren Whitwham

Subject: [External] RE: Enbridge Gas - 2022 Storage Enhancement Project filed with OEB

Date: Monday, November 22, 2021 3:21:59 PM

#### **CAUTION: EXTERNAL EMAIL**

This email originated from outside Enbridge and could be a phish. Criminals can pretend to be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Great! I just sent an invitation for 9:30 to 10:00.

Rosalind

 From:
 Ashe, Rosalind (ENERGY)

 To:
 Lauren Whitwham

 Cc:
 Gibson, Amy (ENERGY)

Subject: [External] 2022 Storage Enhancement Update
Date: Thursday, December 2, 2021 1:49:18 PM

#### **CAUTION: EXTERNAL EMAIL**

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Hello Lauren.

Thank you for the discussion about 2022 Storage Enhancement. Please let me know if there are any further updates. Otherwise, if I haven't been in contact with all community representatives by the time of the holiday break, I will resume in the new year.

Sincerely,

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 12 of 14

 From:
 Ashe, Rosalind (ENERGY)

 To:
 Lauren Whitwham

Subject: [External] 2022 Storage Enhancement: Aamjiwnaang

Date: Tuesday, December 7, 2021 1:32:20 PM

#### CAUTION: EXTERNAL EMAIL

This email originated from outside Enbridge and could be a phish. Criminals can pretend to be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Hi Lauren.

Cathleen O'Brien has asked for the consultation log. Can you send a copy to Cathleen or to me, so that I can send it to Cathleen?

I'm so pleased to have made contact!

Sincerely,

Rosalind

From: Lauren Whitwham <Lauren.Whitwham@enbridge.com>

Sent: December 7, 2021 3:02 PM

To: Ashe, Rosalind (ENERGY) <Rosalind.Ashe@ontario.ca>
Subject: RE: 2022 Storage Enhancement: Aamjiwnaang

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hey there,

I sent a copy to Cathleen and cc'd you. I also included the Project Notification for her.

I'm just finishing up the ER comments and hope to get them out soon.

Talk soon,

Lauren

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 13 of 14

From: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Sent: Tuesday, January 4, 2022 4:53 PM

To: Lauren Whitwham < Lauren. Whitwham@enbridge.com >

Subject: [External] Happy New Year!

#### **CAUTION: EXTERNAL EMAIL**

This email originated from outside Enbridge and could be a phish. Criminals can pretend to

be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Hi Lauren,

I hope that you had some time to relax over the holiday season...although I'm sure you're very busy right now, with the delay in return-to-school.

Would it be possible for us to have a short 'check-in' early next week? There is nothing specific, but I'm looking to start reaching out to certain communities again.

Thank you.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.STAFF.10, Attachment 2, Page 14 of 14

From: Lauren Whitwham <Lauren.Whitwham@enbridge.com>

Sent: January 5, 2022 9:06 AM

To: Ashe, Rosalind (ENERGY) < Rosalind. Ashe@ontario.ca>

Subject: RE: Happy New Year!

### CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good morning Rosalind,

Happy New Year to you! The holiday season was very relaxing and enjoyable. I hope you had a nice one too.

Happy to connect with you next week. Would Tuesday Jan 11 at 9am work for you?

Looking forward to connecting on this.

Thanks, Lauren

 From:
 Ashe, Rosalind (ENERGY)

 To:
 Lauren Whitwham

Subject: [External] RE: Happy New Year!

Date: Wednesday, January 5, 2022 10:37:13 AM

#### CAUTION: EXTERNAL EMAIL

This email originated from outside Enbridge and could be a phish. Criminals can pretend to be anyone. Do not interact with the email unless you are 100% certain it is legitimate. Report any suspicious emails.

Hi Lauren,

Thank you! Yes, it was a quiet, relaxing holiday season...Ottawa travel plans were cancelled at the last minute.

Tuesday, January 11 is fine for me, but could we chat at either 8:30/8:45 or 10:00?

I look forward to catching up with you.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.11 Page 1 of 2

#### **ENBRIDGE GAS INC.**

## Answer to Interrogatory from OEB Staff ("STAFF")

#### **INTERROGATORY**

Reference:

Exh G/Tab 1/Sch 1/p.2,3

#### Preamble:

Enbridge Gas stated that its land agents have contacted the parties directly impacted by the Project. The parties are a tenant farmer (in the case of well TKC 69 and the pipeline) and third-party landowners (regarding the MOP increase for Dow Moore and Payne Pools). No easement or temporary land use agreement is required for work associated with the construction of the pipeline as Enbridge Gas is the owner of the land. Enbridge states that agreements for temporary working rights to complete construction in the Dow Moore and Payne Pools will be negotiated where required.

#### Question:

- a) Please comment on any concerns that have been expressed by the tenant farmer with respect to the Project.
- b) Please provide an update on negotiations with the third-party landowners regarding any required agreements for temporary working rights, including any concerns that have been expressed by these landowners with respect to the Project.
- c) Where concerns have been expressed by landowners, please explain what actions Enbridge Gas has taken or discussions it has had with landowners to address these concerns.

#### Response

a) The tenant farmer has not expressed any concerns regarding the Project to Enbridge Gas.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.11 Page 2 of 2

b) Third-party landowners have been notified of the Project but there have not been any negotiations for temporary working rights to date. All Project work will be completed in compliance with the rights in the existing Gas Storage Lease Agreements held by Enbridge Gas.

Landowners within the Payne Storage Pool inquired about the type of matting being used to build the temporary laneways and working areas to access the wells. An Enbridge Gas representative provided the landowners with three different types of matting to choose from. No other questions or concerns have been raised by these landowners to date.

c) To date, no concerns about the Project have been expressed by landowners.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.12 Page 1 of 3

#### **ENBRIDGE GAS INC.**

## Answer to Interrogatory from OEB Staff ("STAFF")

#### INTERROGATORY

Reference:

Exh A/Tab 2/Sch 1, p.1

#### Preamble:

Enbridge Gas has requested a favourable report from the OEB supporting its well drilling licence application under section 40(1) of the OEB Act. Should the OEB determine that it will issue a favourable report recommending the issuance of a well licence, the OEB may also recommend certain conditions of licence.

#### **Question**:

Please comment on the conditions of licence proposed by OEB staff as set out below. Please note that these conditions are draft and subject to additions or changes.

#### Application under Section 40 of the OEB Act Enbridge Gas Inc. EB-2021-0078 DRAFT CONDITIONS OF LICENCE

- 1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2021-0078 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.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.12 Page 2 of 3

- 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 well, 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:
  - i. 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
  - 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

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- 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 in-service date, or, where the deadline falls between December 1 and May 31, the following June 1. which shall:
  - i. 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
  - 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 with:
  - a) Canadian Standards Association Z341,1-18 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the Ministry of Northern Development, Mines, Natural Resources and Forestry
  - b) 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.

#### Response

Enbridge Gas has no concerns with regard to the conditions of licence proposed by OEB Staff at this time.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.13 Page 1 of 3

#### **ENBRIDGE GAS INC.**

## Answer to Interrogatory from OEB Staff ("STAFF")

#### INTERROGATORY

Reference:

Exh A/Tab 2/Sch 1, p.1

#### Preamble:

Enbridge Gas has applied for leave to construct a pipeline under section 91 of the OEB Act.

#### Question:

Please comment on the draft conditions of approval proposed by OEB staff. If Enbridge Gas does not agree with any of the draft conditions of approval, please identify the specific conditions that Enbridge Gas disagrees with. Explain the rationale for disagreement and for any proposed changes or amendments.

#### Application under Section 91 of the OEB Act Enbridge Gas Inc. EB-2021-0078 DRAFT CONDITIONS OF APPROVAL

- 1. Enbridge Gas Inc. (Enbridge Gas) shall construct the proposed facilities and restore the land in accordance with the OEB's Decision and Order in EB-2021-0078 and these Conditions of Approval.
- 2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued, unless construction has commenced prior to that date.
  - (b) Enbridge Gas shall give the OEB notice in writing:
    - i. of the commencement of construction, at least ten days prior to the date construction commences
    - ii. of the planned in-service date, at least ten days prior to the date the facilities go into service
    - iii. of the date on which construction was completed, no later than 10 days following the completion of construction

Filed: 2022-01-17 EB-2021-0078 Exhibit I.STAFF.13 Page 2 of 3

- iv. of the in-service date, no later than 10 days after the facilities go into service
- 3. Prior to the commencement of construction of the proposed facilities, Enbridge Gas shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the proposed facilities.
- 4. Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
- 5. Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Gas shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
- 6. 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
    - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project
  - (b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
    - i. provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 4
    - ii. describe the condition of any rehabilitated land

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- iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction
- iv. include the results of analyses and monitoring programs and any recommendations arising therefrom
- 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; and the rationale for taking such actions
- 7. Enbridge Gas shall designate one of its employees as project manager who will be responsible for the fulfillment of these conditions, and shall provide the employee's name and contact information to the OEB and to all the appropriate landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.

#### Response

Enbridge Gas has no concerns with the conditions of approval proposed by OEB Staff at this time.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.1 Page 1 of 1 Plus Attachment

## ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### **INTERROGATORY**

#### Reference:

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.

#### Question(s):

- 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.

#### Response:

- a) Subsequent to the filing of this application, Enbridge Gas has determined that one of observation wells (Union Payne 23; Well Licence Number T007833) does not require a master valve and wellhead upgrade. Master valves and new wellheads will be installed on 25 wells and emergency shutdown valves will be required for 24 wells. The existing and proposed technical specifications for each of these wells can be found at Attachment 1 to this response.
- b) Confirmed.

### Dow Moore Wells to be Upgraded:

Well Inf	ormation	Existing	<u> </u>		Proposed	
Well	Well Licence	Wellhead	Master Valve	Wellhead	Master Valve	Emergency Shutdown Valve
DM 1-23	Number T004564	API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A 2000psi (PR2, PSL2, SSO)	API 6A (2000psi, PR2, PSL2)	API 6A (2000psi, PR2, PSL 2)
		bowl: 8-5/8 x 11"	9" Grove Ball Valve	bowl: existing	<u> </u>	7-1/16" Gate Valve
		spool: 11" x 9" dsa: 9" (2K) x 9" (3K)	]	spool: 11" x 7-1/16"	1	
DM 5-23	T004550	API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A (2000psi, PR2, PSL2, SSO)	API 6A (2000psi, PR2, PSL2)	API 6A (2000psi, PR2, PSL 2)
		bowl: 8-5/8 x 11"	9" Grove Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
		spool: 11" x 9" dsa: 9" (2K) x 9" (3K)		spool: 11" x 7-1/16"		
TD 6	T007291	API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A (2000psi, PR2, PSL2, SSO)	API 6A (2000psi, PR2, PSL2)	API 6A (2000psi, PR2, PSL 2)
		bowl: 8-5/8 x 11" spool: 11" x 9"	9" Grove Ball Valve	bowl: existing spool: 11" x 7-1/16"	7-1/16" Gate Valve	7-1/16" Gate Valve
TD 10	T007485	dsa: 9" (2K) x 9" (3K)	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
10 10	1007465	API 6A (2000psi, PR2, PSL2, SSO) bowl: 9-5/8 x 11"	2160psi 6" WKM Ball	PSL2, SSO) bowl: existing	PR2, PSL2)	PR2, PSL 2) 7-1/16" Gate Valve
		spool: 11" (2K)x 7-	Valve	spool: 11" x 7-1/16"	, 1,10 date valve	7 1/10 Gate valve
TD 11	T007295	1/16" (3K) API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO) bowl: 9-5/8 x 11"	2160psi 9" Grove Ball	PSL2, SSO) bowl: existing	PR2, PSL2) 7-1/16" Gate Valve	PR2, PSL 2) 7-1/16" Gate Valve
		spool: 11" x 9"	Valve	spool: 11" x 7-1/16"		
TD 13	T007297	dsa: 9" (2K) x 9" (3K) API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A (2000psi, PR2, PSL2, SSO)	API 6A (2000psi, PR2, PSL2)	API 6A (2000psi, PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Cameron Ball Valve	bowl: existing		7-1/16" Gate Valve
		spool: 11" x 7-1/16" dsa: 7-1/16" (2K) x 9" (3K)		spool: 11" x 7-1/16"	1	
TD 14	T007298	API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A (2000psi, PR2, PSL2, SSO)	API 6A (2000psi, PR2, PSL2)	API 6A (2000psi, PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" WKM Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
		spool: 11" x 9" dsa: 9" (2K) x 9" (3K)		spool: 11" x 7-1/16"	_	

Well	Well	Wellhead	Master Valve	Wellhead	Master Valve	Emergency
	Licence					Shutdown Valve
	Number					
TD 15	T007299	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
TD 17	T007301	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
TD 18	T008398	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve		]	
		spool: 11" x 9"		spool: 11" x 7-1/16"	]	
		dsa: 9" (2K) x 9" (3K)				
TD 19	T008399	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
TD 20	T008397	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	•	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	. ,	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
TD 24	T008395	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"	1	spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)		A.D. GA /2222 :	100 00 10000	
TD 25	T008394	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 9-5/8 x 11"	9" Grove Ball	bowl: existing	/-1/16" Gate Valve	7-1/16" Gate Valve
		1.44" 0"	Valve	1 4411 = 4/45"		
		spool: 11" x 9"	4	spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				

### Payne Wells to be Upgraded:

Well In	formation	Existing	3		Proposed	
Well	Well Licence	Wellhead	Master Valve	Wellhead	Master Valve	Emergency Shutdown Valve
	Number					
P11	_	API 6A (2000psi, PR2, PSL2, SSO)	ANSI 900 2160psi	API 6A 2000psi (PR2, PSL2, SSO)		API 6A (2000psi, PR2, PSL 2)
		bowl: 7" x 9"	6" Grove Ball	bowl: existing	7-1/16" Gate Valve	•
		SOWI. 7 X S	Valve	bown existing	7 17 10 Gate valve	7 1/10 Gate valve
		spool: 9" x 7 1/16"	1	spool: 9" x 7-1/16"		
		dsa: 7 1/16" (2K) x 7				
		1/16" (3K)				
P12	T001855	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	· · · · · · · · · · · · · · · · · · ·	PR2, PSL 2)
		bowl: 7" x 9"	6" Grove Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
		spool: 9" x 7 1/16"	vaive	spool: 9" x 7-1/16"	1	
		dsa: 7 1/16" (2K) x 7	1		1	
		1/16" (3K)				
P14	T009015	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 7" x 9"	6" Grove Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valv
		spool: 9" x 7 1/16"	1	spool: 9" x 7-1/16"		
		dsa: 7 1/16" (2K) x 7	1			
		1/16" (3K)				
P15	T001857	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,		API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	•	PR2, PSL 2)
		bowl: 7" x 9"	6" WKM Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valv
		spool: 9" x 7 1/16"		spool: 9" x 7-1/16"		
		dsa: 7 1/16" (2K) x 7	†			
P16	T009019	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 7" x 9"	6" WKM Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valv
		spool: 9" x 7 1/16"	1	spool: 9" x 7-1/16"		
		dsa: 7 1/16" (2K) x 7	1			
		1/16" (3K)				
P17	T005878	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	, , ,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)		PR2, PSL 2)
		bowl: 8-5/8 x 11"	8" Grove Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valv
		spool: 11" x 7-1/16"	vaive	spool: 11" x 7-1/16"	1	
		dsa: 7-1/16" (2K) x 9"	†	55001. II X /-1/10	1	
		(3K)				
P18	T005880	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)		PR2, PSL 2)
		bowl: 8-5/8 x 11"	8" WKM Ball Valve	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valv
		spool: 11" x 9"	1	spool: 11" x 7-1/16"	1	
		dsa: 9" (2K) x 9" (3K)	1		1	

Well	Well Licence	Wellhead	Master Valve	Wellhead	Master Valve	Emergency Shutdown Valve
	Number					Silutuowii vaive
P19	T006781	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 8-5/8 x 11"	8" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
P20	T006782	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	
		bowl: 8-5/8 x 9"	6" WKM Ball	bowl: existing	7-1/16" Gate Valve	
			Valve			
		spool: 9" x 7 1/16"		spool: 9" x 7 1/16"		
		dsa: 7 1/16" (2K) x 7				
		1/16" (3K)				
P21	T006783	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)	PR2, PSL2)	PR2, PSL 2)
		bowl: 8-5/8 x 11"	8" Grove Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"	]	spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				
P22	T007022	API 6A (2000psi, PR2,	ANSI 900	API 6A (2000psi, PR2,	API 6A (2000psi,	API 6A (2000psi,
		PSL2, SSO)	2160psi	PSL2, SSO)		PR2, PSL 2)
		bowl: 8-5/8 x 11"	8" WKM Ball	bowl: existing	7-1/16" Gate Valve	7-1/16" Gate Valve
			Valve			
		spool: 11" x 9"		spool: 11" x 7-1/16"		
		dsa: 9" (2K) x 9" (3K)				

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.2 Page 1 of 1

## ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### INTERROGATORY

#### Reference:

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.

#### Question(s):

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.

#### Response:

a) Confirmed.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.3 Page 1 of 2

## ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### <u>INTERROGATORY</u>

#### Reference:

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.

#### Question(s):

- 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.

#### Response:

a) The "What-If" risk assessments were completed in compliance with section 5.1 of CSA Z341. While the statutes referenced in this question were not specifically reviewed as part of the "What-If" risk assessments, the safety of Enbridge Gas's employees and contractors, the public and the environment are always considered in the "What-If" risk assessments. The risk assessments performed for the Project included an examination of public and worker exposure potential in the event of an ignited incident. The analysis also incorporated the findings of the Neighbouring Assessment, and any concerns identified in the Neighbouring Assessment were examined in the "What-If" risk assessments.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.3 Page 2 of 2

Enbridge Gas has many programs outside of the "What-If" risk assessment that address risks related to regulatory public safety and environmental requirements. For example, the ER found at Exhibit F, Tab 1, Schedule 1, Attachment 1, was completed for the Project pursuant to the OEB's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario* ("Guidelines"). The Guidelines give consideration to the *Environmental Protection Act* in addition to several other statutes. The ER includes identification of physical, natural and socio-economic features and the potential effects of the Project on these features. The ER provides guidance to construct the project in a manner that protects the environment and manages potential environmental impacts through the implementation of the proposed mitigations outlined in Table 4.1 of the ER.

b) Yes. In preparation for the Project, Enbridge Gas completed a review of all active wells within each of the pools. This review identified the wellhead upgrades that have been proposed as part of the Project and discussed at Exhibit C, Tab 1, Schedule 1, pages 5 and 6. Enbridge Gas is confident in the ability of the wells to continue to prevent any subsurface release of gas at the proposed increase in operating pressure.

As part of the Assessment of Neighbouring Activities, Enbridge Gas also reviewed active and abandoned wells within 1 kilometer of the base of gas of each of the pools. A well assessment was completed for each well and no concerns were identified related to the potential for these wells to act as a conduit for the movement of gas from the storage pools into the overlying formations or to the surface. These assessments considered the proximity of nearby residences, roadways and other neighbouring facilities that may be impacted by an uncontrolled surface or subsurface gas release. The quality of these abandonments and the potential for communication was deemed to be acceptable and would not be impacted by the increased operating pressure of each of the pools.

c) Proximity and operating characteristics were reviewed as part of the Neighbouring Assessment for each of the pools. Enbridge Gas conducted a review of all available well information for all active and abandoned wells within 1 kilometer of the base of gas of each pool and all wells that penetrate the storage reef. The documentation reviewed by Enbridge Gas included the Company's own well records, information available through the Oil, Gas & Salt Resources Library, and 1195714 Alberta Ltd. (Pembina)'s well records to which Enbridge Gas received access.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.4 Page 1 of 1 Plus Attachment

# ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### **INTERROGATORY**

#### Reference:

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.

#### Question(s):

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

#### Response:

a) Please see Attachment 1 to this response.

Filed: 2022-01-17, EB-2021-0078, Exhibit I.MNDMNRF.4, Attachment 1, Page 1 of 7

Supporting studies: Dow Moore and Payne Caprock Integrity Modeling

Memorandum



1 Raymond St., Suite 200 Ottawa, Ontario K1R 1A2 Tel: (613) 232-2525 Fax: (613) 232-7149

### **MEMORANDUM**

www.geofirma.com

Date: January 4, 2022

To: Kathy McConnell, Technical Manager Storage & Reservoir, Enbridge Gas Inc.

Shelie Cascadden, Senior Geologist, Enbridge Gas Inc.

From: Robert Walsh, Geofirma Engineering Ltd.

RE: Chronological list of supporting studies for geomechanical models of the Dow

Moore and Payne pools

#### REFERENCE:

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.

#### Question:

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

#### **RESPONSE:**

This memo summarizes the sources of the data used for numerical modeling studies of the Payne and Dow Moore pools. The reports consulted include a large number of laboratory tests on core samples of caprock, a number of in-situ tests in caprock formations, and earlier geological, engineering, and modeling studies at various pools. This larger body of data was used to populate probabilistic models for geomechanical safety assessment. Consequently, there is considerable overlap between the source data files used for the geomechanical studies at the Dow Moore and Payne pools. The reports for each pool have been arranged in chronological order on the following pages.



#### Source reports for Dow Moore Pool model:

- Core Laboratories. 1953. Core Analysis Reports for Payne 4 and 8.
- Core Laboratories, 1966. Core Analysis Imp Sombra 4-14-13. Core Laboratories Canada Ltd., Calgary, Alberta.
- Gill, D. 1985. Depositional Facies of Middle Silurian (Niagaran) Pinnacle Reefs, Belle River Mills Gas Field, Michigan Basin, Southeastern Michigan. In: Roehl P.O., Choquette P.W. (eds) Carbonate Petroleum Reservoirs, pp. 121-140. Springer, New York, NY.
- Core Laboratories. 1988. Core Analysis Results TEC DOW #4 6-21-XII. File Number 52131-88-0548. Core Laboratories, Calgary, AB.
- Core Laboratories, 1989. Core Analysis Union Enniskillen #54. Core Laboratories Canada Ltd., Calgary, Alberta.
- Core Laboratories, 1990. ICG #2 Enniskillen 4-22-II A-2 and Guelph Formations Ontario. Core Laboratories Canada Ltd., Calgary, Alberta
- Raven, KG, DW Lafleur, RA Sweezey. 1990. Monitoring well into abandoned deep-well disposal formations at Sarnia, Ontario., Canadian Geotechnical Journal, 27: 105-118.
- Northwest Labs, 1998. Core Analysis Report Union Bentpath East 1 Dawn 2-26-V1. Northwest Labs, Calgary, Alberta.
- Hycal Energy Research Laboratories, 1999. Union Gas Bentpath East Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- Hycal Energy Research Laboratories, 1999. Union Gas Booth Creek Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- AGAT, 2000. Threshold Pressure and Mechanical Properties Study Union Mandaumin #4 & Bluewater #1 Wells Silurian Formation, AGAT Laboratories, Calgary, AB.
- AGAT, 2001. Threshold Pressure and Mechanical Properties Study Union Bickford 27, Union Terminus 12, Union Rosedale 9, Union Bentpath 11, Union Dawn 156, Union Dawn 183 & Union Dawn 139 Wells, AGAT Laboratories, Calgary, AB.
- AGAT Laboratories, 2005. Threshold Pressure Airport No.2 Sarnia -33-FLH A2 Anhydrite Formation. AGAT Laboratories Ltd, Calgary, Alberta.
- TerraTek. 2006. Failure Characterization of Rotary Sidewall Plugs from Various Wells Union Gas Storage Program. TerraTek, Salt Lake City, Utah.
- Terralog, 2006. Geomechanical Analysis for Delta pressure Operations at Five Union Gas Storage Fields in Southwestern Ontario. Terralog Technologies USA Inc., Arcadia, California.
- TerraTek. 2007. Unconfined and Triaxial Compression Testing for Failure Characterization of: Well UD.282, Dawn 156 Pool, and Well SC.1, St Clair Pool. TerraTek, Salt Lake City, Utah.
- Enhanced Well Stimulation. 2007. Comments Concerning Formation Breakdown Tests Union Gas Ltd. D156 High-Deliverability Project, Enhanced Well Stimulation Inc, Athens, Texas.
- Market Hub Partners. 2007. Airport 1 Micro Fracture Test, Market Hub Partners, Ontario, Canada.
- Union Gas, 2007. Engineering Review Delta Pressure Enniskillen 28 Pool. Union Gas Ltd., Sarnia, Ontario.
- AGAT Laboratories, 2007a. Threshold Pressure Test Results ICG2 Enniskillen 4-22-II Oil Springs East Storage Pool. AGAT Laboratories Ltd.



- AGAT Laboratories, 2007b. Threshold Pressure Test Results Well St.Clair 1, Sombra 8-B-XI A2 Shale Formation. Calgary, Alberta.
- AGAT Laboratories, 2007c. Threshold Pressure Test Results Wells- Eddy's Mills#1, Dawn 3-32-VIII, ICG2 Enniskillen 4-22-II, Union Enniskillen No.60, and Union Payne No.15. Calgary, Alberta.
- Hobbs, MY, SK Frape, O. Shouakar-Stash, LR Kennell. 2008. Phase I Regional Hydrogeochemistry, Southern Ontario, OPG 00216-REP-01300-00006-R0, Ontario Power Generation Inc., Toronto, Ontario.
- Union Gas, 2008. Engineering Review Delta Pressure Dow A Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2008. Engineering Review Delta Pressure Oil Springs East Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2008. Engineering Review Delta Pressure Enniskillen 28 Pool. Union Gas Ltd., Sarnia, Ontario.
- Hycal Energy Research Laboratories, 2009. Union Gas Limited Bentpath East Storage Pool Well #1 and #2 Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- Hycal Energy Research Laboratories, 2009. Union Gas Limited Oil City Storage Pool Union Oil City 1 (Enniskillen -17-V Well) Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- Hycal Energy Research Laboratories, 2009. Union Gas Limited Bluewater Storage Pool Union Bluewater 1, Sarnia 5-3-II Well Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- Calder, N, J Avis, P Humphreys, F King, P Suckling and R Walsh. 2009. Postclosure Safety Assessment (V1): Gas Modeling, NWMO DGR-TR-2009-07. Nuclear Waste Management Organization, Toronto, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure BentPath East Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure Oil City Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure Bluewater Pool. Union Gas Ltd., Sarnia, Ontario.
- Weatherford, 2011. Tecumseh Storage Facilities, Caprock Permeability and Rock Mechanics Study (Weatherford Labs File #: 48475). Weatherford Laboratories, Calgary, AB.
- Lam, T and S. Usher. 2011. Regional Geomechanics Southern Ontario, NWMO DGR-TR-2011-13, Nuclear Waste Management Organisation, Toronto, Ontario.
- Raven, KG, D McCreath, R Jackson, I Clark, D Heagle, S Sterling, M Melaney. 2011. Descriptive Geosphere Site Model, OPG's Deep Geologic Repository for Low and Intermediate Level Waste, NWMO DGR-TR-2011-24, Nuclear Waste Management Organisation, Toronto, Ontario.
- Weatherford, 2012. Enbridge Gas Distribution Inc. Caprock Permeability and Rock Mechanics Study. Weatherford Laboratories, Calgary, Alberta.
- Sproule. 2012. Enbridge Gas Storage Integrated Reservoir Study Phase III Volume 2 Dow Moore (December 2012), Sproule Associates Limited, Calgary, AB.



Filed: 2022-01-17, EB-2021-0078, Exhibit I.MNDMNRF.4, Attachment 1, Page 4 of 7

Supporting studies: Dow Moore and Payne Caprock Integrity Modeling

Memorandum

- Hydro Resolutions, 2013. Analysis of UB.13 Pulse Tests. Hydro Resolutions LLC, Rio Rancho, New Mexico.
- Geofirma, 2014a. Union Bentpath 13 Lab Geomechancial Strength Testing of UB.13 Core, UG-TR-13-02, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2014b. Union Bentpath 13 Westbay Installation and Monitoring, UG-TR-13-03, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2014c. Union Bentpath 13 Lab Geochemical Testing, UG-TR-13-04, Geofirma Engineering Ltd., Ottawa, Ontario.
- Union Gas, 2015. Dawn 59-85 Pool Geologic and Engineering Report. Union Gas Ltd., Sarnia, Ontario.
- Geofirma, 2018. Laboratory Geomechanical and Petrophysical Testing of UD.288 Core. Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2019. Enbridge Delta Pressuring Project: Black Creek Pool Geomechanical Modeling Report, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2020. Geoscientific Caprock Characterization Study: Ladysmith Gas Storage Pool, Lambton County, Ontario (Draft). Geofirma Engineering Ltd., Ottawa, Ontario.
- Enbridge, 2021. Dow Moore Pool Geologic and Engineering Report, Underground Storage Department, Enbridge Gas Inc, Chatham. Ontario, June 2021.



#### Source reports for Payne Pool model:

- Core Laboratories. 1953. Core Analysis Reports for Payne 4 and 8.
- Core Laboratories, 1966. Core Analysis Imp Sombra 4-14-13. Core Laboratories Canada Ltd., Calgary, Alberta.
- Gill, D. 1985. Depositional Facies of Middle Silurian (Niagaran) Pinnacle Reefs, Belle River Mills Gas Field, Michigan Basin, Southeastern Michigan. In: Roehl P.O., Choquette P.W. (eds) Carbonate Petroleum Reservoirs, pp. 121-140. Springer, New York, NY.
- Core Laboratories. 1988. Core Analysis Results TEC DOW #4 6-21-XII. File Number 52131-88-0548. Core Laboratories, Calgary, AB.
- Core Laboratories, 1989. Core Analysis Union Enniskillen #54. Core Laboratories Canada Ltd., Calgary, Alberta.
- Core Laboratories, 1990. ICG #2 Enniskillen 4-22-II A-2 and Guelph Formations Ontario. Core Laboratories Canada Ltd., Calgary, Alberta
- Raven, KG, DW Lafleur, RA Sweezey. 1990. Monitoring well into abandoned deep-well disposal formations at Sarnia, Ontario., Canadian Geotechnical Journal, 27: 105-118.
- Northwest Labs, 1998. Core Analysis Report Union Bentpath East 1 Dawn 2-26-V1. Northwest Labs, Calgary, Alberta.
- Hycal Energy Research Laboratories, 1999. Union Gas Bentpath East Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
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- AGAT, 2001. Threshold Pressure and Mechanical Properties Study Union Bickford 27, Union Terminus 12, Union Rosedale 9, Union Bentpath 11, Union Dawn 156, Union Dawn 183 & Union Dawn 139 Wells, AGAT Laboratories, Calgary, AB.
- AGAT Laboratories, 2005. Threshold Pressure Airport No.2 Sarnia -33-FLH A2 Anhydrite Formation. AGAT Laboratories Ltd, Calgary, Alberta.
- TerraTek. 2006. Failure Characterization of Rotary Sidewall Plugs from Various Wells Union Gas Storage Program. TerraTek, Salt Lake City, Utah.
- Terralog, 2006. Geomechanical Analysis for Delta pressure Operations at Five Union Gas Storage Fields in Southwestern Ontario. Terralog Technologies USA Inc., Arcadia, California.
- TerraTek. 2007. Unconfined and Triaxial Compression Testing for Failure Characterization of: Well UD.282, Dawn 156 Pool, and Well SC.1, St Clair Pool. TerraTek, Salt Lake City, Utah.
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- AGAT Laboratories, 2007a. Threshold Pressure Test Results ICG2 Enniskillen 4-22-II Oil Springs East Storage Pool. AGAT Laboratories Ltd.



- AGAT Laboratories, 2007b. Threshold Pressure Test Results Well St.Clair 1, Sombra 8-B-XI A2 Shale Formation. Calgary, Alberta.
- AGAT Laboratories, 2007c. Threshold Pressure Test Results Wells- Eddy's Mills#1, Dawn 3-32-VIII, ICG2 Enniskillen 4-22-II, Union Enniskillen No.60, and Union Payne No.15. Calgary, Alberta.
- Hobbs, MY, SK Frape, O. Shouakar-Stash, LR Kennell. 2008. Phase I Regional Hydrogeochemistry, Southern Ontario, OPG 00216-REP-01300-00006-R0, Ontario Power Generation Inc., Toronto, Ontario.
- Union Gas, 2008. Engineering Review Delta Pressure Dow A Pool. Union Gas Ltd., Sarnia, Ontario.
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- Union Gas, 2008. Engineering Review Delta Pressure Enniskillen 28 Pool. Union Gas Ltd., Sarnia, Ontario.
- Hycal Energy Research Laboratories, 2009. Union Gas Limited Bentpath East Storage Pool Well #1 and #2 Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
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- Hycal Energy Research Laboratories, 2009. Union Gas Limited Bluewater Storage Pool Union Bluewater 1, Sarnia 5-3-II Well Caprock Study. Hycal Energy Research Laboratories Ltd., Calgary, Alberta.
- Calder, N, J Avis, P Humphreys, F King, P Suckling and R Walsh. 2009. Postclosure Safety Assessment (V1): Gas Modeling, NWMO DGR-TR-2009-07. Nuclear Waste Management Organization, Toronto, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure BentPath East Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure Oil City Pool. Union Gas Ltd., Sarnia, Ontario.
- Union Gas, 2009. Engineering Review Delta Pressure Bluewater Pool. Union Gas Ltd., Sarnia, Ontario.
- Weatherford, 2011. Tecumseh Storage Facilities, Caprock Permeability and Rock Mechanics Study (Weatherford Labs File #: 48475). Weatherford Laboratories, Calgary, AB.
- Lam, T and S. Usher. 2011. Regional Geomechanics Southern Ontario, NWMO DGR-TR-2011-13, Nuclear Waste Management Organisation, Toronto, Ontario.
- Raven, KG, D McCreath, R Jackson, I Clark, D Heagle, S Sterling, M Melaney. 2011. Descriptive Geosphere Site Model, OPG's Deep Geologic Repository for Low and Intermediate Level Waste, NWMO DGR-TR-2011-24, Nuclear Waste Management Organisation, Toronto, Ontario.
- Weatherford, 2012. Enbridge Gas Distribution Inc. Caprock Permeability and Rock Mechanics Study. Weatherford Laboratories, Calgary, Alberta.
- Hydro Resolutions, 2013. Analysis of UB.13 Pulse Tests. Hydro Resolutions LLC, Rio Rancho, New Mexico.



Filed: 2022-01-17, EB-2021-0078, Exhibit I.MNDMNRF.4, Attachment 1, Page 7 of 7

Supporting studies: Dow Moore and Payne Caprock Integrity Modeling

Memorandum

- Geofirma, 2014a. Union Bentpath 13 Lab Geomechancial Strength Testing of UB.13 Core, UG-TR-13-02, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2014b. Union Bentpath 13 Westbay Installation and Monitoring, UG-TR-13-03, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2014c. Union Bentpath 13 Lab Geochemical Testing, UG-TR-13-04, Geofirma Engineering Ltd., Ottawa, Ontario.
- Union Gas, 2015. Dawn 59-85 Pool Geologic and Engineering Report. Union Gas Ltd., Sarnia, Ontario.
- Geofirma, 2018. Laboratory Geomechanical and Petrophysical Testing of UD.288 Core. Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2019. Enbridge Delta Pressuring Project: Black Creek Pool Geomechanical Modeling Report, Geofirma Engineering Ltd., Ottawa, Ontario.
- Geofirma, 2020. Geoscientific Caprock Characterization Study: Ladysmith Gas Storage Pool, Lambton County, Ontario (Draft). Geofirma Engineering Ltd., Ottawa, Ontario.
- Enbridge, 2020. Payne Pool Geologic and Engineering Report, Underground Storage Department, Enbridge Gas Inc, Chatham. Ontario, December 2020.



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## ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### INTERROGATORY

#### Reference:

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.

#### Question(s):

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.

#### Response:

a) The COVID-19 pandemic and emergency orders are not expected to impact the proposed construction schedule for the Project. Construction activities will be conducted in compliance with all relevant emergency orders and Enbridge Gas policies to ensure worker and public safety.

Filed: 2022-01-17 EB-2021-0078 Exhibit I.MNDMNRF.6 Page 1 of 1

## ENBRIDGE GAS INC. Answer to Interrogatory from Ministry of Northern Developments, Mines, Natural Resources and Forestry (MNDMNRF)

#### <u>INTERROGATORY</u>

#### Reference:

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.

#### Question(s):

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)?

#### Response:

a) The Company's existing emergency response plan includes provisions for the notification of neighbours, the public, and public agencies in the event of an emergency. The emergency response plan is reviewed and updated annually with any new information or changes, including changes to contact information. The location of the proposed well (TKC 69) will be added to the emergency response plan once the drilling licence is approved and received.