Ministry of Northern Development, Mines, Natural Resources and Forestry

Legal Services Branch 3rd floor, Room 3420 99 Wellesley Street West Toronto ON M7A 1W3 Tel: (416) 314-2002 Ministère du Développement du Nord, des Mines, des Richesses naturelles et des Forêts

Division des services juridiques 3º étage, bureau 3420 99, rue Wellesley ouest Toronto ON M7A 1W3 Tél: (416) 314-2002



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

January 28, 2022

Our File No.

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

E-mail: boardsec@ontarioenergyboard.ca

RE: Enbridge Gas Distribution Inc.

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

Dear Madam,

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

Yours truly,

Demetrius Kappos Counsel Legal Services Branch

Encl.

c. The Applicant

ENBRIDGE GAS LIMITED 2022 STORAGE ENHANCEMENT PROJECT DOW MOORE AND PAYNE POOLS EB-2021-0078

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

Introduction:

Enbridge Gas Limited ("Enbridge") made application ("the Application") on October 27, 2021 to the Ontario Energy Board ("OEB") seeking approval of its 2022 Storage Enhancement Project, seeking the following approvals:

- To increase the maximum operating pressure of its Dow Moore and Payne natural storage pools in order to increase the storage capacity and deliverability of these pools pursuant to section 38(1) of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 ("OEB Act");
- A favorable report from the OEB to the Minister of Northern Development, Mines, Natural Resources and Forestry pursuant to section 40(1) of the OEB Act supporting Enbridge Gas's application for a licence to drill a new natural gas storage well in its Kimball-Colinville natural gas storage pool;
- To construct 85 metres of NPS 10 steel pipeline to connect the new storage well to the existing Kimball-Colinville gathering line pursuant to section 91 of the OEB Act.

Enbridge made application to the Ministry of Northern Development, Mines, Natural Resources and Forestry ("MNDMNRF") pursuant to the *Oil, Gas and Salt Resources*Act ("OGSRA") for a well drilling licence in the Kimball-Colinville (proposed well TKC 69)

Designated Gas Storage Area. On October 22, 2021, MNDMNRF referred the Application to the OEB pursuant to s. 40 of the OEB Act for a Report to the Minister.

The OEB initiated this proceeding subsequent to the MNDMNRF referral.

Further to Interrogatories and responses to Interrogatories, the MNDMNRF is hereby providing a Written Submission.

Analysis:

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

Based on the Application and this further information provided, MNDNMRF has no objection to the Application's approval subject to the Board Staff's proposed conditions of approval. With regard to the draft conditions of approval, we interpret that outstanding items that will or may be required, including from each of the Ministry of Hertiage, Sport, Tourism and Cultural Industries and the Ministry of Energy, are in each instance addressed under OEB Staff draft conditions of approval #4 and/or #5.

We understand that Enbridge, as per its response to Interrogatories, confirms that it will comply with the OGSRA, O.Reg. 245/97 made under the OGSRA, the Provincial Operating Standards and CSA Z341.1-14 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the MNDMNRF.

Conclusion and Relief Requested:

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

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

DATED AT Toronto, this the 28th day of January, 2022.

Yours truly,

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

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

Enbridge Gas Inc. (Applicant):

Tania Persad

Senior Legal Counsel Enbridge Gas Inc. 500 Consumers Road North York ON M2J 1P8

Tel: 416-495-5891

Email: tania.persad@enbridge.com

Dave Janisse

Technical Manager, Leave to Construct Applications Enbridge Gas Inc. 50 Keil Drive North P.O. Box 2001 Chatham, ON N7M 5M1

Tel: 519-436-5442

Email: EGIregulatoryProceedings@enbridge.com