

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

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**Ministère du Développement du Nord,  
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VIA e-mail to Board Registrar ([registrar@oeb.ca](mailto:registrar@oeb.ca)) and RESS

March 1, 2022

Our File No.

Christine Long  
Registrar  
Ontario Energy Board  
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**RE: Enbridge Gas Inc.**

- **Application for leave to construct a natural gas pipeline and for approval to drill two natural gas wells, in the Township of St. Clair in Lambton County**
- **OEB File No.: EB-2021-0248**

Dear Madam,

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

Yours truly,

Demetrius Kappos  
Counsel  
Legal Services Branch  
Ministry of Natural Resources and Forestry

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

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**Enbridge Gas Inc.**

**Application for leave to construct a natural gas pipeline and for  
approval to drill two natural gas wells, in the Township of  
St. Clair in Lambton County**

**Board File No. EB-2021-0248**

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

1. In the Applicant’s **pre-filed evidence, at Exhibit A, Tab 2, Schedule 1, page 2, paragraph 3** and **Exhibit B, Tab 1, Schedule 1, page 1, paragraph 4** the Applicant indicates that its applied-for injection/withdrawal well TKC 68 in the Kimball-Colinville Storage Pool is intended to replace the deliverability lost from the recent abandonment of six storage wells in the same storage pool.

**Interrogatory:**

Please clarify whether TKC 68 is expected to fully replace the deliverability lost from the 6 abandoned wells and if not, are there any plans for application in future to replace that deliverability?

2. In the Applicant's **pre-filed evidence, at Exhibit B, Tab 1, Schedule 1, page 3, paragraph 12**, the Applicant indicates that the need to drill an A1 observation well in the Coveny Storage Pool was identified within the Enbridge Gas Asset Management Plan. At **Exhibit B, Tab 1, page 3, paragraph 13**, the Applicant indicates that the Coveny Storage Pool contains Guelph Formation observation wells that monitor the pressure in the Guelph reef formation where the gas is stored, but do not contain A-1 Carbonate Formation observation wells. At **Exhibit B, Tab 1, Schedule 1, page 3, paragraph 14**, the Applicant states that the proposed A1 observation well is necessary under Section 5.5 of the Canadian Standards Association Standard Z341.1-18 Storage of hydrocarbons in underground formations ("CSA Z341.1-18") which states that observation wells are required to monitor "low-permeability zones or formations adjacent to and in communication with the storage zone."

**Interrogatory:**

Please clarify whether the proposed drilling of an A-1 observation well in the Coveny Storage Pool would be a novel such observation well in that storage pool.

3. In the Applicant's **pre-filed evidence, at Exhibit E, Tab 1, Schedule 1, page 1, paragraph 5**, the Applicant has indicated that they intend to fulfill, to the satisfaction of the MNDMNRF, all the relevant requirements of CSA Z341.1-18.

**Interrogatory:**

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

4. In the Applicant's **pre-filed evidence, at Exhibit E, Tab 1, Schedule 1, pages 2 - 4, paragraphs 8 - 13**, 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.

**Interrogatory:**

- 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) Have the proposal for 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.
5. As part of the project, does the Applicant intend to review and, if necessary, update operating procedures and emergency response plans prior to construction of the works proposed? If yes, 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)?