



Ontario
Energy
Board | Commission
de l'énergie
de l'Ontario

BY EMAIL

February 18, 2025

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Marconi:

Re: EB-2024-0304 Waubuno Well Drilling Licence Application

Please find attached the Ontario Energy Board (OEB) staff interrogatories in the above proceeding.

Enbridge Gas's responses to interrogatories are due **10 days** after receipt of OEB staff interrogatories.

Any questions relating to this letter should be directed to Zora Crnojacki, Senior Advisor at Zora.Crnojacki@oeb.ca or at 416-440-8104. The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Original Signed By

Zora Crnojacki
Senior Advisor

Encl.

cc: Demetrius Kappos, Ministry of Natural Resources and Forestry,
demetrius.kappos@ontario.ca
EGIRegulatoryProceedings@enbridge.com
Henry Ren, Applicant's Counsel, Enbridge Gas Inc., henry.ren@enbridge.com

**OEB Staff Interrogatories
Enbridge Gas Inc.
EB-2024-0304**

Please note, Enbridge Gas Inc. is responsible for ensuring that all documents it files with the OEB, including responses to OEB staff interrogatories and any other supporting documentation, do not include personal information (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's *Rules of Practice and Procedure*.

Staff - 1

Ref.: Exhibit B, Tab 1, Schedule 1, Page 5

Preamble:

Enbridge Gas notes that the Project includes the drilling of the proposed UW4 injection/withdrawal well to replace 51 10³m³/day of withdrawal capability and restore the ability to cycle the Waubuno Storage Pool as the result of well relines, well abandonments, and the proposed abandonment of well UI20. The installation of approximately 100 m of NPS 8-inch natural gas pipeline to connect the well to the existing gathering system is required upon completion of well drilling.

Question(s):

- a) Please identify any future facility projects planned within the Waubuno Storage Pool in the next injection/withdrawal season that would require approval of the OEB. For any project identified:
 - i. Please describe the type of any planned facilities, construction and in-service timeline.
 - ii. What is the planned timeline for filing for OEB approvals of these facilities, if any? Under which sections of the OEB Act would these applications be filed?
 - iii. Are there operational dependencies between the proposed Waubuno Well drilling project and any facilities planned for construction and operation within the next injection/withdrawal season?

- iv. If operational dependencies exist, please clarify how these projects may impact or interact with the injection/withdrawal well that is the subject of the current application.
- v. Please discuss any efficiencies in regulatory process that may be attained by filing for approvals simultaneously for all facilities planned to be constructed for operation in the same injection/withdrawal season in a storage pool.

Staff - 2

Ref.: Exhibit D, Tab 1, Schedule 1, Page 3-4

Preamble:

As a condition of licence in past proceedings, the OEB has required that the applicant conform with the relevant requirements of the CSA Z341.1-22 standard; the OGSRA; and related regulations to the satisfaction of the Ministry of Natural Resources and Forestry (MNRF). In its application, Enbridge Gas acknowledges this requirement.

Enbridge Gas states that it sent an email to MNRF on November 5, 2023, indicating that the following studies had been conducted in compliance with CSA Z341.1-22 in support of the application:

- A Neighbouring Assessment for the Waubuno Storage Pool as prescribed by CSA Z341.1-22; and
- A Risk Assessment (“what if” analysis of hazards and operability issues) for the Waubuno Storage Pool for the proposed well drilling.

Enbridge Gas further states that MNRF acknowledged receipt of the Company’s email indicating completion of the studies and has not contacted Enbridge Gas to request any additional review to date.

Question(s):

- a) Since filing the application, has Enbridge Gas received any further communication from MNRF?
- b) If any communication was received, please indicate whether MNRF stated it is satisfied with the studies and that Enbridge Gas complied with all relevant requirements under CSA Z341.1-22, the OGSRA and related regulations.
- c) Please file a copy of any additional correspondence with MNRF since the application was filed.

Staff - 3

Ref.: Exhibit I, Tab 1, Schedule 1

Preamble:

The Indigenous Consultation Report (ICR) was provided to the Ministry of Energy and Electrification (ENERGY) on the date of this filing. The ICR is current as of December 5, 2024.

ENERGY will review Enbridge Gas's consultation with Indigenous groups potentially affected by the Project and provide its letter of opinion as to whether Enbridge Gas's consultation has been sufficient. Upon receipt of ENERGY's letter regarding the sufficiency of Indigenous consultation on the Project, Enbridge Gas will file it with the OEB.

Question:

- a) Please discuss any updates to the ICR since December 5, 2024. Are there any outstanding concerns Enbridge Gas identified since then and how does Enbridge Gas plan to address them?
- b) Please indicate when Enbridge Gas expects to receive a Letter of Opinion from ENERGY.

Staff - 4

Ref.: Exhibit A, Tab 2, Schedule 1

Preamble:

Enbridge Gas applied for well drilling licences under section 40(1) of the OEB Act. Should the OEB determine that it is appropriate to do so, it would issue a favourable report to the Ministry of Natural Resources and Forestry (MNRF) recommending the issuance of well licences and may also recommend certain conditions.

Question:

- a) Please comment on the draft conditions of the licence proposed by OEB staff below. These are similar to those approved by the OEB in prior requests to the OEB for favourable reports to MNRF on well drilling applications.

If Enbridge Gas does not agree with any of the draft conditions of approval, please identify the specific condition(s) that Enbridge Gas disagrees with. Explain the rationale for disagreement and for any proposed changes or amendments.

**Application under Section 40 of the OEB Act
Enbridge Gas Inc. EB-2024-0304**

PROPOSED CONDITIONS OF LICENCE

1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2024-0304 proceeding and comply with applicable laws, regulations and codes pertaining to the construction of the proposed wells.
2. The authority granted under this licence to Enbridge Gas is not transferable to another party without leave of the OEB. For the purpose of this condition, another party is any party except Enbridge Gas.
3. Enbridge Gas shall construct the facilities and restore the land in accordance with its application and evidence given to the OEB, except as modified by this licence and these Conditions.
4. Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding.
5. Enbridge Gas shall develop a Project-specific Spill Response Plan prior to the start of well drilling operations and following the installation of the Project facilities, the location of the facilities will be added to Enbridge Gas's Emergency Response Plan.
6. 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.
7. 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; and
 - ii. The installation of facilities and construction shall be coordinated to minimize disruption of agricultural land and agricultural activities.
8. Enbridge Gas shall, subject to the recommendation of 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.

9. Concurrent with the final monitoring report referred to in Condition 10(b), Enbridge Gas shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Gas shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Enbridge Gas proposes to start collecting revenues associated with the Project, whichever is earlier.
10. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:
 - a) A Post Construction Report, within three months of the in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 1;
 - ii. Describe any impacts and outstanding concerns identified during construction;
 - iii. Describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) A Final Monitoring Report, no later than fifteen months after the 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;

- iii. Describe the effectiveness of any actions taken to prevent or mitigate any identified impacts during construction;
- iv. Include the results of analyses and monitoring programs and any recommendations arising therefrom; and
- v. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions.

11. For the purposes of these conditions, Enbridge Gas shall conform with:

- a) CSA Z341.1-22 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the Ministry of Natural Resources and Forestry (MNRF); and
- 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 MNRF.

12. 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 MNRF, 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.