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February 28, 2025

BY RESS AND EMAIL

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File: EB-2024-0304
Waubuno Well Drilling Project
Interrogatory Responses**

In accordance with the OEB's Case Information Letter dated February 10, 2025, enclosed please find Enbridge Gas's interrogatory responses for the Waubuno Well Drilling Project.

If you have any questions, please contact the undersigned.

Sincerely,

Evan Tomek

Evan Tomek
Senior Advisor, Regulatory Applications – Leave to Construct

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB Staff ("STAFF")

Interrogatory

Reference:

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.

Response:

- a. There are no other facility projects planned within the Waubuno Storage Pool in the next injection/withdrawal season (March 31, 2025 – April 1, 2026). There are two facility projects planned within the Waubuno Storage Pool in future injection/withdrawal seasons that will require OEB approval: the Waubuno Pipeline and Compressor Station Replacement Project and the Waubuno Maximum Operating Pressure Increase Project.

- i. The purpose of the proposed Waubuno Pipeline and Compressor Station Replacement Project is to replace the existing Waubuno compressor as it's near its end of life, which will allow continued use of the Waubuno Storage Pool. Additionally, due to the differing sizes of the gathering pipeline in the Waubuno Storage Pool, in-line inspection tool selection is restrictive or cost prohibitive. As such, the other purpose of the Waubuno Pipeline and Compressor Station Replacement Project is to modify the gathering system and well laterals to allow for efficient and cost-effective in-line inspection to identify any potential integrity concerns. Pending OEB approval, construction is planned for Q2 2027 with an in-service date in Q3 2027.

The purpose of the Waubuno Maximum Operating Pressure Increase Project is to increase the maximum operating pressure of the Waubuno Storage Pool to allow Enbridge Gas to store additional natural gas. The project will involve upgrading wellheads, well crossovers and installation of emergency shutdown valves on injection/withdrawal natural gas storage wells. The additional storage capacity created by the project will be sold to third parties as part of the Enbridge Gas unregulated storage business. Pending OEB approval, construction is planned for Q2 2028 with an in-service date in Q4 2028.

- ii. Enbridge Gas is planning to file an application with the OEB under section 90(1) of the *Ontario Energy Board Act, 1998* (OEB Act) for an order granting leave to construct the proposed Waubuno Pipeline and Compressor Station Replacement Project in Q4 2025.

Enbridge Gas is planning to file an application with the OEB under section 38(1) of the OEB Act for an order to vary the maximum operating pressure of the Waubuno Storage Pool in Q4 2027.

iii - iv

There are no other facilities planned for construction and operation within the next injection/withdrawal season in the Waubuno Storage Pool. There are no operational dependencies between the proposed Waubuno Well Drilling Project and the two future facility projects. The drilling of the proposed injection/withdrawal natural gas storage well (UW4) described in the current well drilling application (EB-2024-0304) is needed in the next injection/withdrawal season to replace the withdrawal capability lost due to the planned abandonment of one injection/withdrawal well and due to the previous relining of four wells and abandonment of one well in the Waubuno Storage Pool.

- v. Enbridge Gas acknowledges the 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. For example, the proposed replacements of the Waubuno gathering pipeline and Waubuno compressor are planned in the same injection/withdrawal season and therefore a single application is proposed to be filed with the OEB as described in the responses to parts a) i – ii of this Exhibit.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB Staff ("STAFF")

Interrogatory

Reference:

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.

Response:

a - c)

Enbridge Gas has not received any further communication from MNR since filing the application.

Enbridge Gas accepts the responsibility for compliance with all relevant requirements under CSA Z341.1-22, the OGSRA and related regulations.

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB Staff ("STAFF")

Interrogatory

Reference:

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(s):

- 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.

Response:

- a) Please see Attachment 1 to this response for the updated ICR as of February 24, 2025. The following updates have been made to the ICR since December 5, 2024:
 - Enbridge Gas received the signed capacity funding agreement from Chippewas of Kettle and Stony Point First Nation (CKSPFN) on December 16, 2024.

- Enbridge Gas provided responses to CKSPFN's comments on the Environmental Report on January 15, 2025.
- Enbridge Gas submitted the Environmental Protection Plan to CKSPFN and Chippewas of the Thames First Nation for their review and feedback on February 13, 2025.

At this time, Enbridge Gas is not aware of any outstanding issues or concerns and will continue to engage with the Indigenous Nations on the Project.

- b) Enbridge Gas expects ENERGY to provide the Letter of Opinion following the close of the Ontario provincial election.

**Enbridge Gas Inc. Indigenous Consultation Log for the
Waubuno Well Drilling Project ("Project")
Log updated to February 24, 2025**

Aamjiwnaang First Nation ("AFN")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
1.0	May 21, 2024	Email	An Enbridge Gas representative emailed the AFN representative to notify them of the Waubuno Well Drilling Project ("Project"). The Enbridge Gas representative advised that the Project does not trigger a Leave to Construct ("LTC"), however Enbridge Gas was engaging based on Enbridge's Lifecycle Engagement protocols and keeping AFN informed of work in the area. The Enbridge Gas representative advised that Enbridge Gas was proposing to drill one new natural gas storage well and install approximately 100 m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Designated Storage Area ("DSA") and provided a map of the proposed well location and DSA. The Enbridge Gas representative advised that Enbridge Gas had reached out to the Ministry of Energy for delegation of the Duty to Consult and expects to hear from them in the next couple of weeks. The Enbridge Gas representative also advised that there will also be upcoming Stage 2 archaeology fieldwork and TMHC would be reaching out for monitoring opportunities.		See line-item attachment 1.0.

1.1	May 24, 2024	Email	Timmins Martelle Heritage Consultants (TMHC), acting on behalf of Enbridge Gas, emailed the AFN representatives to advise of Stage 1 archaeological assessment ("AA") findings and that they would be completing the Stage 2 archaeology fieldwork. TMHC provided an anticipated date for the fieldwork and advised AFN to reach out to Enbridge Gas to complete the monitoring agreement.		See line-item attachment 1.1.
1.2	May 30, 2024	Email	A TMHC representative emailed the AFN representative to inquire if they were interested in participating in the Stage 2 archaeology fieldwork.		
1.3	June 5, 2024	Email	A TMHC representative emailed the AFN representative to provide the contact information for the TMHC representative that will be on site for the Stage 2 archaeology fieldwork. The TMHC representative advised that the work was anticipated to be completed in one day. TMHC also advised that a hi-visibility vest and CSA approved work boots are required.		
1.4	June 7, 2024	Email	A TMHC representative emailed the AFN representative to advise that the fieldwork will be rescheduled once the field has been reploughed.		
1.5	June 11, 2024	Email	A TMHC representative emailed the AFN representative to advise that the field will be reploughed in the fall and that they will be in contact when it is time for fieldwork.		
1.6	August 19, 2024	Email	An Enbridge Gas representative emailed the AFN representative to provide the Project Notification. The		See line-item attachment 1.6.

			Enbridge Gas representative also provided them with the Virtual Information Session and map. The Enbridge Gas representative advised them to reach out if they had any questions.		
1.7	August 19, 2024	Email		An AFN representative emailed the Enbridge Gas representative to provide them an additional contact to include in all information being provided going forward.	
1.8	August 20, 2024	Email		An AFN representative emailed the Enbridge Gas representative to invite them to present about the Project at the upcoming Environment Committee Meeting and provided various potential dates for the presentation.	
1.9	August 20, 2024	Email	An Enbridge Gas representative emailed the AFN representative to confirm receipt of the additional contact to be included going forward.		
1.10	August 21, 2024	Email		An AFN representative emailed the Enbridge Gas representative to provide updated available time slots for the presentation.	
1.11	August 22, 2024	Email	An Enbridge Gas representative emailed the AFN representative to confirm a presentation time on September 17, 2024. The Enbridge Gas representative requested a virtual meeting invite for those not attending in person.		
1.12	August 26, 2024	Email		An AFN representative emailed the Enbridge Gas representative to confirm the date and	

				time for the presentation and to advise that a link will be sent soon.	
1.13	August 28, 2024	Email	An Enbridge Gas representative emailed the AFN representative to thank them for the information		
1.14	August 29, 2024	Email		An AFN representative emailed the Enbridge Gas representative to provide the presentation guidelines.	
1.15	September 12, 2024	Email	An Enbridge Gas representative emailed the AFN representative to provide the presentation for the upcoming meeting and to remind the AFN representative to send the virtual meeting link.		
1.16	September 13, 2024	Email		An AFN representative emailed the Enbridge Gas representative to provide the virtual meeting link.	
1.17	September 13, 2024	Email	An Enbridge Gas representative emailed the AFN representative to thank them for the virtual meeting link.		
1.18	September 17, 2024	Meeting	Enbridge Gas representatives met with AFN representatives to provide an overview of the Project. The Enbridge Gas representative went over the Virtual Public information Session and presented the slides describing the Project. Topics of discussion included completion of the species at risk ("SAR") survey and permits, archaeology summary, continued monitoring opportunities with Tri-Tribal Monitoring Services ("TTMS"), Project application and approval process, drilling depth process, and seismic testing. The Enbridge Gas representative advised that the	An AFN representative asked if SAR survey has been completed. Enbridge Gas advised that it had not been completed but would be included in the environmental review. An AFN representative asked if permits have been obtained. Enbridge Gas responded that they would be applying to the Ministry of Natural Resources and Forestry for a permit for the well drilling.	

			Environmental Report ("ER") will be provided to AFN at the end of the month.	An AFN representative asked about the archaeology summary and noted that they would continue to contact TTMS for monitoring. Enbridge Gas responded that archaeology work was still being completed and TMHC would be reaching out soon. An AFN representative asked about the application process and expectation of approval. An Enbridge Gas representative reviewed the scheduling slide and discussed where Enbridge Gas was in the process and how the process worked. An AFN representative advised they would like the full community to be aware of the Project. Enbridge Gas advised they would continue to work with the Environmental Committee on the Project.	
1.19	September 27, 2024	Email	A TMHC representative emailed the AFN representative on behalf of Enbridge Gas regarding the Stage 2AA fieldwork scheduled to take place. The TMHC representative advised the fieldwork would take one day to complete and was anticipated to start October 7th. The TMHC representative inquired if AFN would like to participate.		
1.20	September 27, 2024	Email		An AFN representative emailed the Enbridge Gas representative	

				regarding the TMHC email, to advise that a TTMS representative was included, and they will wait for their response if there are available AFN representatives to participate.	
1.21	September 27, 2024	Email		An TTMS representative emailed the Enbridge Gas representative to advise them they are available to participate.	
1.22	September 27, 2024	Email	An Enbridge Gas representative emailed the TTMS representative an agreement for participation in the fieldwork.		
1.23	September 27, 2024	Email		A TTMS representative emailed the Enbridge Gas representative the signed contract.	
1.24	October 4, 2024	Email	A TMHC representative emailed the TTMS /AFN representative on behalf of Enbridge Gas regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised that the field work would start on October 7 th and should be completed in one day. The TMHC representative provided the contact information for the TMHC representative that would be on site. The TMHC representative advised them of the required PPE to participate.		
1.25	October 4, 2024	Email		A TTMS/AFN representative emailed the TMHC and Enbridge Gas representative to thank them for the information.	

1.26	October 4, 2024	Email	A TMHC representative emailed the AFN representative to provide them with updated contact information.		
1.27	October 7, 2024	Email	An Enbridge Gas representative emailed the AFN representative to provide the ER. The Enbridge Gas representative asked for comments to be provided by November 18, 2024. Enbridge Gas offered capacity support to enable AFN's engagement in the review of documents. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		See line-item attachment 1.27.
1.28	October 9, 2024	Email		An AFN representative emailed the Enbridge Gas representative to confirm receipt of the ER and that they will respond shortly.	
1.24	October 24, 2024	Email	An Enbridge Gas representative emailed the AFN representative to ensure they were able to access the report. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		
1.25	November 5, 2024	Email	A Stantec representative, on behalf of Enbridge Gas, emailed the AFN representative to provide information regarding Stage 1-2 Archeological Assessment ("AA") fieldwork. The Stantec representative advised that the fieldwork is anticipated to take one day and is scheduled for the week of November 11, 2024. The Stantec representative advised that if they would like to participate, to reach out.		
1.26	November 6, 2024	Email		An AFN representative emailed the Stantec and Enbridge Gas representative to	

				advise that they would like to participate.	
1.27	November 7, 2024	Email	An Enbridge Gas representative emailed the AFN and Stantec representative to advise that they would provide a participation agreement.		
1.28	November 7, 2024	Email	An Enbridge Gas representative emailed the AFN representative to provide a participation agreement for the upcoming Stage 1-2 AA fieldwork.		
1.29	November 8, 2024	Email		An AFN representative emailed the Enbridge Gas representative to provide them with the signed participation agreement for the upcoming Stage 1-2 AA fieldwork.	
1.30	November 8, 2024	Email	An Enbridge Gas representative emailed the AFN representative to thank them for their response.		
1.31	December 6, 2024	Email	An Enbridge Gas representative emailed the AFN representative to provide a monthly update on the Project.		
1.32	February 13, 2025	Email	An Enbridge Gas representative emailed the AFN representative to provide a monthly update on the Project.		
Chippewas of Kettle and Stony Point First Nation ("CKSPFN")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
2.0	May 21, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/Three Fires Group (TFG) representative to notify them of an upcoming Project. The Enbridge Gas representative advised that the Project does not trigger a LTC, however Enbridge Gas was		See line-item attachment 2.0.

			engaging based on Enbridge's Lifecycle Engagement protocols and keeping CKSPFN/TFG informed of work in the area. The Enbridge Gas representative advised that Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 m of NPS 8-inch lateral natural gas pipeline in the DSA and provided a map of the proposed well location and DSA. The Enbridge Gas representative advised that Enbridge Gas had reached out to the Ministry of Energy for delegation of the Duty to Consult and expects to hear from them in the next couple of weeks. The Enbridge Gas representative also advised that there will also be upcoming Stage 2 archaeology fieldwork and TMHC would be reaching out for monitoring opportunities.		
2.1	May 24, 2024	Email	TMHC, acting on behalf of Enbridge Gas, emailed the CKSPFN/TFG representatives to advise of Stage 1 AA findings and that they would be completing the Stage 2 archaeology fieldwork. TMHC provided an anticipated date for the fieldwork and advised CKSPFN/TFG to reach out to Enbridge Gas to complete the monitoring agreement.		See line-item attachment 2.1.
2.2	May 27, 2024	Email		A CKSPFN/TFG representative emailed TMHC and Enbridge Gas to advise they were interested in participating and seeking a monitor agreement.	

2.3	May 27, 2024	Email		A CKSPFN /TFG representative emailed the Enbridge Gas representative to acknowledge the early notification and advise they were interested in learning more about the cumulative effects assessment and impact assessment and how TFG/CKSPFN might be involved in those studies.	See line-item attachment 2.3.
2.4	May 30, 2024	Email	A TMHC representative emailed the CKSPFN/TFG representative to provide the direct Enbridge Gas representative contact for a participation agreement.		
2.5	May 30, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to provide a monitoring agreement for the Project.		
2.6	May 31, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to confirm receipt of the agreement and to advise that they will provide it back to the Enbridge Gas representative immediately. The CKSPFN/TFG representative advised that they will have a representative available for the planned work.	
2.7	June 5, 2024	Email	An TMHC representative emailed the CKSPFN/TFG to provide the contact information for the TMHC representative that would be on site for the Stage 2 archaeology fieldwork. The TMHC representative advised that the work was anticipated		

			to be completed in one day. TMHC also advised that a hi-visibility vest and CSA approved work boots are required.		
2.8	June 5, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to provide them the signed monitoring agreement.	
2.9	June 5, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to confirm receipt of the email.		
2.10	June 7, 2024	Email	A TMHC representative emailed the CKSPFN/TFG representative to advise that the fieldwork will be rescheduled once the field has been reploughed.		
2.11	June 7, 2024	Email		A CKSPFN/TFG representative emailed the TMHC representative to thank them for the update.	
2.12	June 11, 2024	Email	A TMHC representative emailed the CKSPFN/TFG representative to advise them that the field will be reploughed in the fall and that they will be in contact when it is time for fieldwork.		
2.13	June 12, 2024	Email		A CKSPFN/TFG representative emailed the TMHC representative to thank them for the update.	
2.14	August 19, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to provide the Project Notification. The Enbridge Gas representative also provided them with the Virtual Information Session and map. The Enbridge Gas representative advised them to		See line-item attachment 2.14.

			reach out if they had any questions.		
2.15	September 27, 2024	Email	A TMHC representative emailed the CKSPFN/TFG representative on behalf of Enbridge Gas regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised the fieldwork would take one day to complete and was anticipated to start October 7 th . The TMHC representative inquired if CKSPFN/TFG would like to participate.		
2.16	October 3, 2024	Email		A CKSPFN/TFG representative emailed the TMHC representative to advise that there were no CKSPFN/TFG representatives available to attend the Stage 2 AA fieldwork on October 7 th .	
2.17	October 4, 2024	Email	A TMHC representative emailed the CKSPFN/TFG representative to confirm receipt of the email and that a CKSPFN/TFG representative will not be attending the fieldwork.		
2.18	October 7, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to provide the Project ER. The Enbridge Gas representative asked for comments to be provided by November 18, 2024. Enbridge Gas offered capacity support to enable CKSPFN/TFG's engagement in the review of documents. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		See line-item attachment 2.18.
2.19	October 16, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to provide a draft	

				capacity funding agreement for the Project.	
2.20	October 24, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to confirm that the draft agreement is being reviewed and that they were able to access the report. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		
2.21	October 24, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to confirm that they are able to access the report	
2.22	October 30, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative providing a capacity funding offer and advised them to reach out if they had any further questions.		See line-item attachment 2.22.
2.23	November 19, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to advise that they were finalizing their comments to the ER. A CKSPFN/TFG representative advised they expected them to be sent out the following day.	
2.24	November 20, 2024	Email	An Enbridge Gas representative emailed the CKSPFN/TFG representative to thank them for the update.		
2.25	November 20, 2024	Email		A CKSPFN/TFG representative emailed the Enbridge Gas representative to provide their comments on the ER.	See line-item attachment 2.25. CKSPFN provided high level comments/ques

					tions in relation to Enbridge Gas projects in general including: CKSPFN's interest in working with Enbridge Gas to identify culturally important wildlife, plants and medicines and assess potential impacts to rights and interests in the initial stages of environmental reports; information regarding expectations around species at risk and how TFG may be involved in the future; noting that cumulative effects is a major concern and their desire to expand such assessments; and their interest in reviewing an environmental protection plan and well drilling program. TFG/CKSPFN made more specific comments related to the following topics: wildlife and wildlife habitat;
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					species at risk and species at risk habitat; rationale for buffer around Project components; environmental interactions during operations; surveys or assessments; CKSPFN monitoring; tree removal and tree protection zones; erosion and sediment control, dust suppression, equipment cleaning; revegetation and remediation plans; the protection of water resources and related monitoring; cumulative effects assessment; monitoring of fugitive emissions and leak surveys.
2.26	November 21, 2024	Email	An Enbridge Gas representative emailed the CKSPFN representative to acknowledge the ER comments and advised Enbridge Gas would be working on responses.		
2.27	December 6, 2024	Email	An Enbridge Gas representative emailed the CKSPFN representative to provide a monthly update on the Project.		
2.28	December 16, 2024	Email		A CKSPFN representative emailed the Enbridge Gas	

				representative to provide them with a signed capacity funding agreement.	
2.29	December 16, 2024	Email	An Enbridge Gas representative emailed the CKSPFN representative to thank them for providing the signed agreement and indicated that Enbridge Gas will begin to process the funding.		
2.30	December 16, 2024	Email	An Enbridge Gas representative emailed a TFG/CKSPFN representative to advise them that Enbridge Gas is working on responses to their comments on the ER and will provide them in January 2025.		
2.31	January 15, 2025	Email	An Enbridge Gas representative emailed the CKSPFN representative to thank them for their input on the Project ER and to provide responses to CKSPFN. Responses addressed: the nature of the land use in the Project area and the limited potential for wildlife or impacts on wildlife; the delineation and assessment of cumulative effects in accordance with applicable guidance; the lack of surface water resources in the area; frequency and methods for monitoring and inspecting fugitive emissions; the commitment to provide the Environmental Protection Plan (“EPP”) to CKSPFN and the availability of the well drilling application; explanation of limited vegetation removal; identification of ER updates in accordance with comments; preliminary field surveys and why certain additional surveys/studies were not required; opportunities for site		See line-item attachment 2.31.

			visits; designation and identification of Species at Risk and mitigation measures to protect wildlife, including amphibians and reptiles; erosion and sediment controls and monitoring; dust suppression; equipment cleaning protocols; remediation plans, including revegetation; water resources protection measures and associated plans, including the water well monitoring program.		
2.32	January 22, 2025	Email		A CKSPFN representative emailed the Enbridge Gas representative to thank them for their responses and indicated that if CKSPFN needs to discuss further, they would reach out.	
2.33	January 22, 2025	Email	An Enbridge Gas representative emailed the CKSPFN representative to thank them and told them that Enbridge Gas would be available for further discussions.		
2.34	February 13, 2025	Email	An Enbridge Gas representative emailed the CKSPFN representative to provide them with the EPP for their review. The Enbridge Gas representative asked for the comments to be returned by February 28 th .		
2.35	February 13, 2025	Email	An Enbridge Gas representative emailed the CKSPFN representative to provide a monthly update on the Project.		
2.36	February 18, 2025	Email		A CKSPFN representative emailed the Enbridge Gas representative to advise that they will review and have comments on the EPP	

				returned by February 28 th .	
Chippewas of the Thames First Nation ("COTTFN")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
3.0	May 22, 2024	Email	An Enbridge Gas representative emailed the COTTFN representative to notify them of an upcoming Project. The Enbridge Gas representative advised that the Project does not trigger a LTC, however Enbridge Gas was engaging based on Enbridge's Lifecycle Engagement protocols and keeping COTTFN informed of work in the area. The Enbridge Gas representative advised that Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 m of NPS 8-inch lateral natural gas pipeline in the DSA and provided a map of the proposed well location and DSA. The Enbridge Gas representative advised that Enbridge Gas had reached out to the Ministry of Energy for delegation of the Duty to Consult and expects to hear from them in the next couple of weeks. The Enbridge Gas representative also advised that there will also be upcoming Stage 2 archaeology fieldwork and TMHC would be reaching out for monitoring opportunities.		See line-item attachment 3.0.
3.1	May 24, 2024	Email	TMHC, acting on behalf of Enbridge Gas, emailed the COTTFN representatives to advise of Stage 1 AA findings		See line-item attachment 3.1.

			and that they would be completing the Stage 2 archaeology fieldwork. TMHC provided an anticipated date for the fieldwork and advised COTTFN to reach out to Enbridge Gas to complete the monitoring agreement.		
3.2	May 24, 2024	Email		A COTTFN representative emailed the TMHC representative to advise they were interested in archaeology monitoring.	
3.3	May 24, 2024	Email	An Enbridge Gas representative emailed the COTTFN representative to provide a monitoring agreement for the Project.		
3.4	May 24, 2024	Email		A COTTFN representative emailed an Enbridge Gas representative to thank them for getting the monitoring agreement back to them so quickly.	
3.5	June 5, 2024	Email	An TMHC representative emailed the COTTFN to provide the contact information for the TMHC representative that will be on site for the Stage 2 archaeology fieldwork. The TMHC representative advised that the work was anticipated to be completed in one day. TMHC also advised that a hi-visibility vest and CSA approved work boots are required.		
3.6	June 6, 2024	Email		A COTTFN representative emailed the Enbridge Gas representative to provide the contact information for the COTTFN representative attending the Stage 2 archaeology fieldwork.	

				The COTTFN representative advised that if there are any changes to the schedule to contact that contact directly.	
3.7	June 7, 2024	Email	A TMHC representative emailed the COTTFN representative to advise that the fieldwork will be rescheduled once the field has been reploughed.		
3.8	June 7, 2024	Email		A COTTFN representative emailed the Enbridge Gas representative to thank them for the update and that they will look for the revised date.	
3.9	June 11, 2024	Email	A TMHC representative emailed the COTTFN representative to advise them that the field will be reploughed in the fall and that they will be in contact when it is time for fieldwork.		
3.10	June 12, 2024	Email		A COTTFN representative emailed the Enbridge Gas representative to advise that they will wait for the email in the fall.	
3.11	August 19, 2024	Email	An Enbridge Gas representative emailed the COTTFN representative to provide the Project Notification. The Enbridge Gas representative also provided them with the Virtual Information Session and map. The Enbridge Gas representative advised them to reach out if they had any questions.		See line-item attachment 3.11.
3.12	September 27, 2024	Email	A TMHC representative emailed the COTTFN representatives regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised		

			the fieldwork would take one day to complete and was anticipated to start October 7 th . The TMHC representative inquired if COTTFN would like to participate.		
3.13	September 27, 2024	Email		A COTTFN representative emailed the TMHC and Enbridge Gas representative to confirm that COTTFN would like to participate in the Stage 2 AA fieldwork scheduled to take place. The COTTFN representative advised that they would follow up with the field representative that will be attending and requested the TMHC field supervisor's contact information.	
3.14	October 4, 2024	Email	A TMHC representative emailed the COTTFN representative regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised that the field work is to start on October 7 th and should be completed in one day. TMHC provided the contact information for the TMHC representative that would be on site. The TMHC representative advised them of the required PPE to participate.		
3.15	October 4, 2024	Email	A TMHC representative emailed the COTTFN representative to provide updated contact information for the TMHC field supervisor.		
3.16	October 7, 2024	Email	An Enbridge Gas representative emailed the COTTFN representative to provide the Project ER. The Enbridge Gas representative asked for comments to be		See line-item attachment 3.16.

			provided by November 18, 2024. Enbridge Gas offered capacity support to enable COTTFN's engagement in the review of documents. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		
3.17	October 17, 2024	Email	An Enbridge Gas representative emailed the COTTFN representative to provide them with the Virtual Public Information Session Slides for the Project.		
3.18	November 19, 2024	Email		A COTTFN representative emailed the Enbridge Gas representative to acknowledge the Virtual Open House slides provided and advise that they uploaded them to NationsConnect. The COTTFN representative provided the Enbridge Gas representative with comments on the Environmental Report.	COTTFN commented that the ER should refer to the Treaty context (Huron Tract) or Indigenous occupation of the area. COTTFN asked about the number of wells that would be in the Waubuno designated storage area (DSA) and requested more details as to why wells have been abandoned. COTTFN asked if the Project would change the working capacity of the DSA or only maintain existing capacity. COTTFN commented that Enbridge Gas' gas storage

					facilities pre-date meaning full consultation and accommodation and noted COTTfN's interest in ongoing discussions with Enbridge Gas on accommodation for impacts in COTTfN's territory.
3.19	December 4, 2024	Email	An Enbridge Gas representative emailed the COTTfN representative providing responses to the comments on the Environmental Report. The responses addressed: the addition of further information regarding treaty and Indigenous histories in the ER; the number of wells at the site and the reason for abandoning the one well; and a commitment to ongoing engagement with COTTfN.		See line-item attachment 3.19 The responses addressed: the addition of further information regarding treaty and Indigenous histories in the ER; the number of wells at the site and the reason for abandoning the one well; and a commitment to ongoing engagement with COTTfN.
3.20	February 13, 2024	Email	An Enbridge Gas representative emailed the COTTfN representative to provide them with the EPP for their review. The Enbridge Gas representative asked for the comments to be returned by February 28 th .		
3.21	February 24, 2025	Email	An Enbridge Gas representative emailed the COTTfN representative to provide a monthly update on the Project.		
Oneida of the Thames First Nation ("Oneida Nation")					

Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
4.0	May 22, 2024	Email	An Enbridge Gas representative emailed an Oneida Nation representative to notify them of an upcoming Project. The Enbridge Gas representative advised that the Project does not trigger a LTC, however Enbridge Gas was engaging based on Enbridge's Lifecycle Engagement protocols and keeping Oneida Nation informed of work in the area. Enbridge Gas representative advised that Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 m of NPS 8-inch lateral natural gas pipeline in the DSA and provided a map of the proposed well location and DSA. The Enbridge Gas representative advised that Enbridge Gas had reached out to the Ministry of Energy for delegation of the Duty to Consult and expects to hear from them in the next couple of weeks. The Enbridge Gas representative also advised that there will also be upcoming Stage 2 archaeology fieldwork and TMHC would be reaching out for monitoring opportunities		See line-item attachment 4.0.
4.1	May 24, 2024	Email	TMHC, acting on behalf of Enbridge Gas, emailed the Oneida Nation representatives to advise of Stage 1 AA findings and that they would be completing the Stage 2 archaeology fieldwork. TMHC provided an anticipated date		See line-item attachment 4.1.

			for the fieldwork and advised Oneida Nation to reach out to Enbridge Gas to complete the monitoring agreement.		
4.2	May 27, 2024	Email		An Oneida Nation representative emailed the TMHC and Enbridge Gas representative to advise them to involve an Oneida Nation representative.	
4.3	May 27, 2024	Email	An Enbridge Gas representative emailed the Oneida Nation representative to provide the TMHC email and advised they will forward the Oneida Nation contact on to TMHC.		
4.4	June 7, 2024	Email	A TMHC representative emailed the Oneida Nation representative to advise that the fieldwork will be rescheduled once the field has been reploughed.		
4.5	June 11, 2024	Email	A TMHC representative emailed the Oneida Nation representative to advise them that the field will be reploughed in the fall and that they will be in contact when it is time for fieldwork.		
4.6	August 19, 2024	Email	An Enbridge Gas representative emailed the Oneida Nation representative to provide the Project Notification. The Enbridge Gas representative also provided them with the Virtual Information Session and map. The Enbridge Gas representative advised them to reach out if they had any questions.		See line-item attachment 4.6.
4.7	September 27, 2024	Email	A TMHC representative emailed the Oneida Nation representative regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised the fieldwork would take one day to complete and was		

			anticipated to start October 7 th . The TMHC representative inquired if Oneida Nation would like to participate.		
4.8	September 27, 2024	Email		An Oneida Nation representative emailed the TMHC and Enbridge Gas representative to advise them they will be available to participate in the Stage 2 AA fieldwork.	See line-item attachment 4.8.
4.9	October 4, 2024	Email	A TMHC representative emailed the Oneida Nation representative on behalf of Enbridge Gas regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised that the field work is to start on October 7 th and should be completed in one day. TMHC provided the contact information for the TMHC representative that will be on site. The TMHC representative advised them of the required PPE to participate.		
4.10	October 4, 2024	Email	A TMHC representative emailed the Oneida Nation representative to provide updated contact information for the TMHC field supervisor.		
4.11	October 7, 2024	Email	An Enbridge Gas representative emailed the Oneida Nation representative to provide the Project ER. The Enbridge Gas representative asked for comments to be provided by November 18, 2024. Enbridge Gas offered capacity support to enable Oneida Nation's engagement in the review of documents. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		See line-item attachment 4.11.
4.12	October 17, 2024	Email	An Enbridge Gas representative emailed the Oneida Nation representative		

			to provide them with the Virtual Public Information Session Slides for the Project.		
4.13	February 24, 2025	Email	An Enbridge Gas representative emailed the Oneida Nation representative to provide a monthly update on the Project.		
Walpole Island First Nation ("WIFN")					
Line Item	Date	Method	Summary of Enbridge Gas Inc. ("Enbridge Gas") Consultation Activity	Summary of Community Consultation Activity	Issues or Concerns Raised and Enbridge Gas Responses
5.0	May 21, 2024	Email	An Enbridge Gas representative emailed the WIFN representative to notify them of an upcoming Project. The Enbridge Gas representative advised that the Project does not trigger a LTC, however Enbridge Gas was engaging based on Enbridge's Lifecycle Engagement protocols and keeping WIFN informed of work in the area. The Enbridge Gas representative advised that Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 m of NPS 8-inch lateral natural gas pipeline in the DSA and provided a map of the proposed well location and DSA. The Enbridge Gas representative advised that Enbridge Gas had reached out to the Ministry of Energy for delegation of the Duty to Consult and expects to hear from them in the next couple of weeks. The Enbridge Gas representative also advised that there will also be upcoming Stage 2 archaeology		See line-item attachment 5.0.

			fieldwork and TMHC would be reaching out for monitoring opportunities.		
5.1	May 24, 2024	Email	TMHC, acting on behalf of Enbridge Gas, emailed the WIFN representatives to advise of Stage 1 findings and that they would be completing the Stage 2 archaeology fieldwork. TMHC provided an anticipated date for the fieldwork and advised WIFN to reach out to Enbridge Gas to complete the monitoring agreement.		See line-item attachment 5.1.
5.2	May 30, 2024	Email	A TMHC representative emailed the WIFN representative to inquire if they were interested in participating in the Stage 2 archaeology fieldwork.		
5.3	June 5, 2024	Email	An TMHC representative emailed the WIFN representative to provide the contact information for the TMHC representative that will be on site for the Stage 2 archaeology fieldwork. The TMHC representative advised that the work was anticipated to be completed in one day. TMHC also advised that a hi-visibility vest and CSA approved work boots are required.		
5.4	June 7, 2024	Email	A TMHC representative emailed the WIFN representative to advise that the fieldwork will be rescheduled once the field has been reploughed.		
5.5	June 11, 2024	Email	A TMHC representative emailed the WIFN representative to advise them that the field will be reploughed in the fall and that they will be in contact when it is time for fieldwork.		
5.6	August 19, 2024	Email	An Enbridge Gas representative emailed the WIFN representative to provide the Project Notification. The Enbridge Gas		See line-item attachment 5.6.

			representative also provided the Virtual Information Session and map. The Enbridge Gas representative advised them to reach out if they had any questions.		
5.7	September 27, 2024	Email	A TMHC representative emailed the WIFN representative on behalf of Enbridge Gas regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised the fieldwork would take one day to complete and was anticipated to start October 7 th . The TMHC representative inquired if WIFN would like to participate.		
5.8	October 4, 2024	Email	A TMHC representative emailed the WIFN representative on behalf of Enbridge Gas regarding the Stage 2 AA fieldwork scheduled to take place. The TMHC representative advised that the field work is to start on October 7 th and should be completed in one day. TMHC provided the contact information for the TMHC representative that will be on site. The TMHC representative advised them of the required PPE to participate.		
5.9	October 4, 2024	Email	A TMHC representative emailed the WIFN representative to provide updated contact information for the TMHC field supervisor.		
5.10	October 7, 2024	Email	An Enbridge Gas representative emailed the WIFN representative to provide the Project ER. The Enbridge Gas representative asked for comments to be provided by November 18, 2024. Enbridge Gas offered capacity support to enable WIFN's engagement in the review of documents. The Enbridge Gas representative		See line-item attachment 5.10.

			advised them to reach out if they had any questions or concerns.		
5.11	October 24, 2024	Email	An Enbridge Gas representative emailed the WIFN representative to ensure they were able to access the report. The Enbridge Gas representative advised them to reach out if they had any questions or concerns.		
5.12	December 6, 2024	Email	An Enbridge Gas representative emailed the WIFN representative to provide a monthly update on the Project.		
5.13	February 13, 2025	Email	An Enbridge Gas representative emailed the WIFN representative to provide a monthly update on the Project.		

Line-item attachment 1.0



Waubuno Notification - May 2024 - AFN.pdf
168 KB



Map.pdf
204 KB

From: Chasity Pilecki <Chasity.Pilecki@enbridge.com>
Sent: Tuesday, May 21, 2024 4:03 PM
To: Lynn Rosales <lrosales@aamjiwnaang.ca>; Courtney Jackson <cjackson@aamjiwnaang.ca>
Subject: Early Notification: 2025 Waubuno Well Drilling Project

Good afternoon,

This email is to notify you of a planned upcoming project. The project does not trigger an LTC, however I am engaging based on Enbridge's Lifecycle Engagement protocols and keeping you informed of our work in the area.

Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

Enbridge Gas has reached out to the Ministry of Energy for delegation of the Duty to Consult and we expect to hear from them in the next couple of weeks.

There will also be upcoming Stage 2 Archaeology fieldwork and TMHC will be reaching out for monitoring opportunities.

Please see the attached letter to learn more.

Kindest regards,

Chasity Pilecki (she/her)
Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability


CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Drive North, Chatham ON, N7M 5M1
enbridge.com



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

May 21, 2024

Aamjiwnaang First Nation
978 Tashmoo Ave.
Sarnia, ON N7T 7H5

Dear Recipient,

Enbridge Gas – Notice of Upcoming Project for the 2025 Waubuno Well Drilling Project

This letter is to notify you of a proposed upcoming project in your area.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

The drilling of well is needed to replace the deliverability lost in the Waubuno Storage Pool due to well relines and abandonments.

The 2025 Waubano Well Drilling Project is proposed to be undertaken pending a positive recommendation from the Ontario Energy Board (OEB) to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the OEB Act.

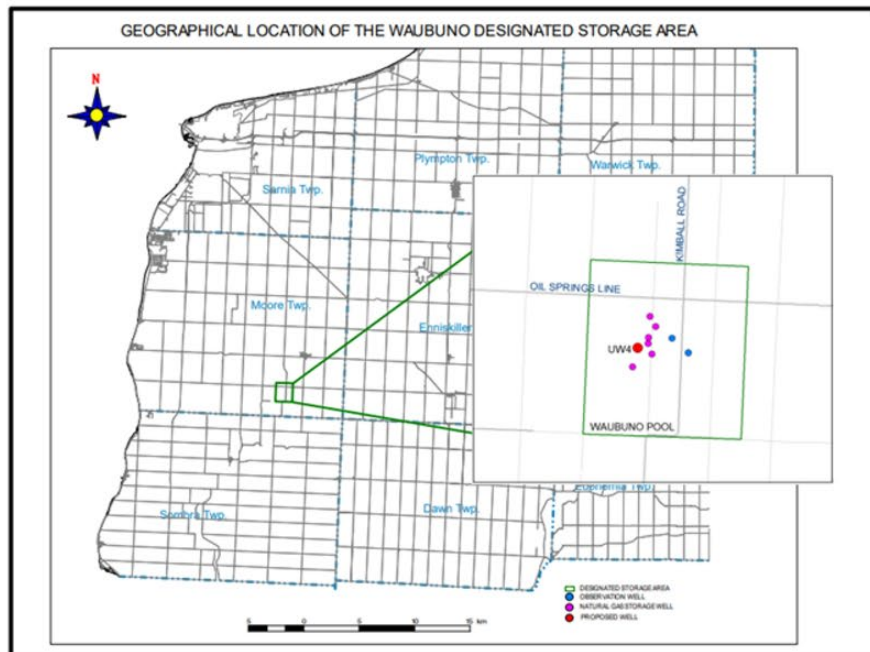
In support of this upcoming OEB application, Enbridge Gas will be undertaking environmental studies in 2024 to review the proposed construction and operation of the project. The environmental studies will include a consultation program, impact assessment, and a cumulative effects assessment.

Enbridge Gas is committed to undertaking consultation with Indigenous Communities and local stakeholders as an integral component of the planning process. Additional details regarding the project and how to become involved during public consultation will be provided in future correspondence. If you have any questions or comments during the development stages of this project, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community and Indigenous Engagement
Enbridge Gas
Chasity.Pilecki@enbridge.com
226-229-1012



Line-item attachment 1.1

From: Liam Browne
Sent: May 24, 2024 9:14 AM
To: Irosales@aamjiwnaang.ca; cjackson@aamjiwnaang.ca
Cc: Matthew Beaudoin <mbeaudoin@tmhc.ca>; Jennifer Donnelly <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Bill Olds <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com
Subject: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Lynn and Courtney,

TMHC has been contacted through Dillon Consulting Limited to complete a Stage 1-2 archaeological assessment for Enbridge Gas Inc.'s Waubuno Well Drilling Project in the Township of St. Clair, Lambton County. The project area is roughly 7 acres in size (see attached Fieldmap - <https://maps.app.goo.gl/GfbPD6yAyHuSxycW7>).

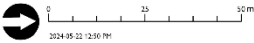
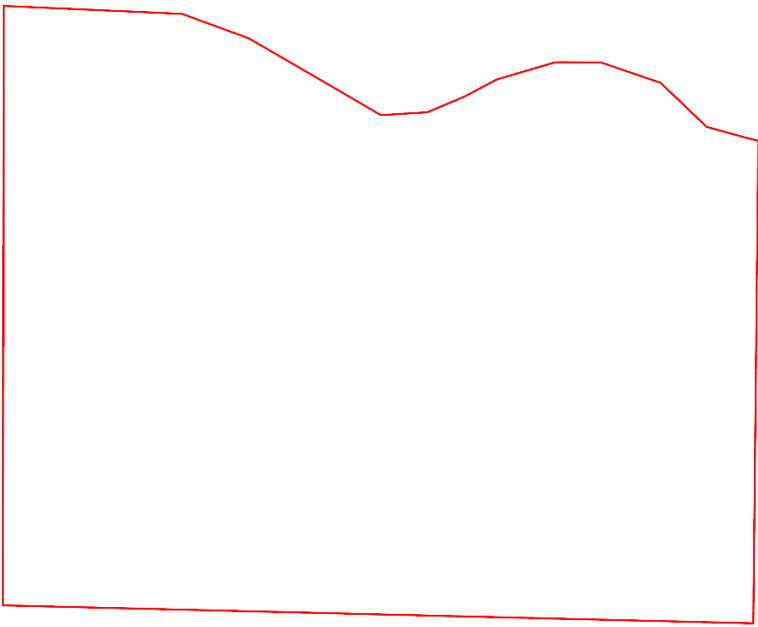
At this point, there are no archaeological sites registered within 1 km of the project area. The project area is located on level ground above the valley associated with Bear Creek. As the project area is located within an active agricultural field, it will be assessed via pedestrian survey. We are anticipating completing this work on June 7. Would Aamjiwnaang like to be involved in this fieldwork?

If you have any questions about the specifics of Enbridge's project please let us know. If there are any questions regarding the archaeological assessment I would be happy to discuss further. Contracts for this project will be signed by Enbridge (Chasity.Pilecki@enbridge.com).

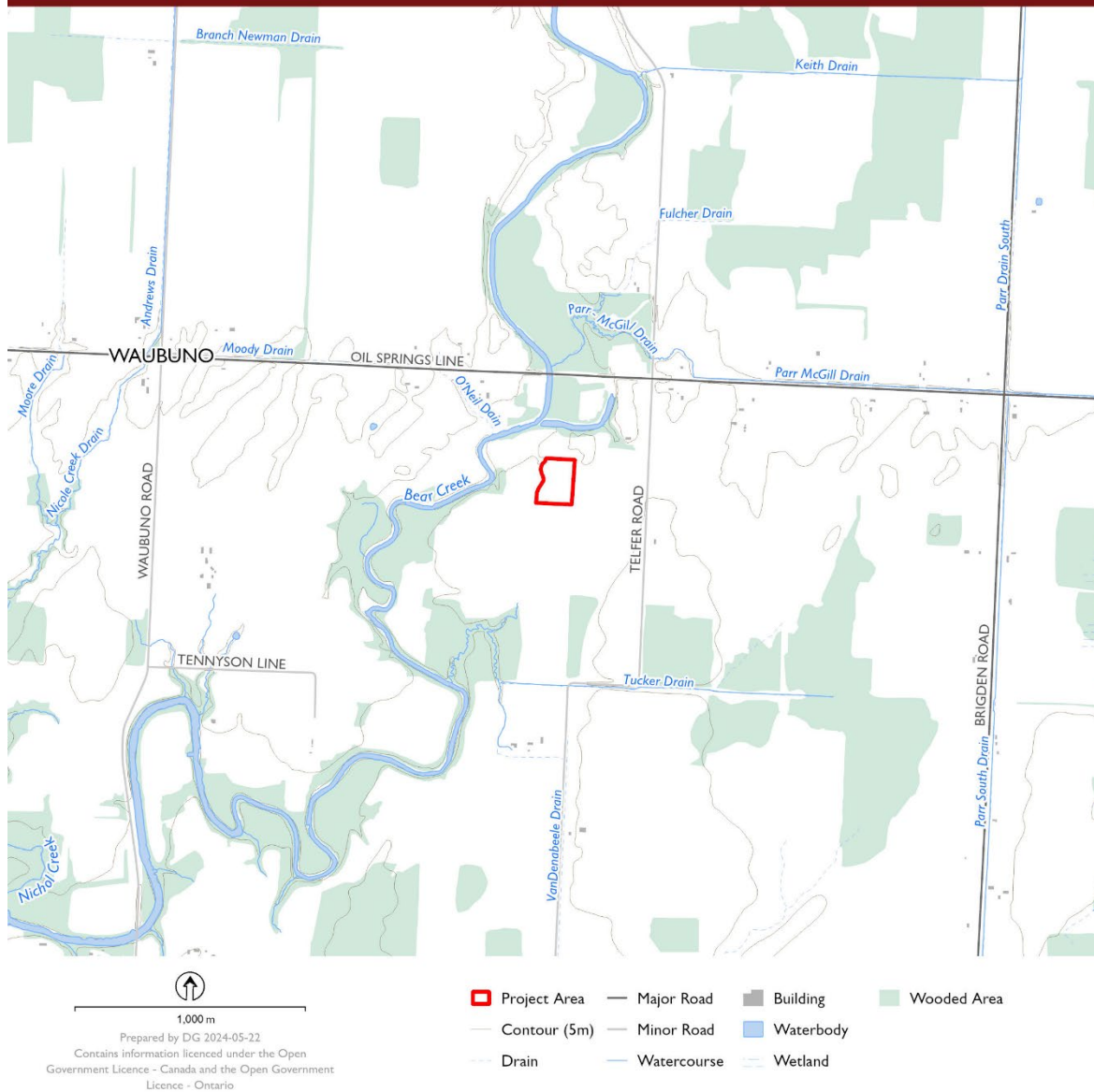
Best,
Liam

Liam Browne, MA, P1048

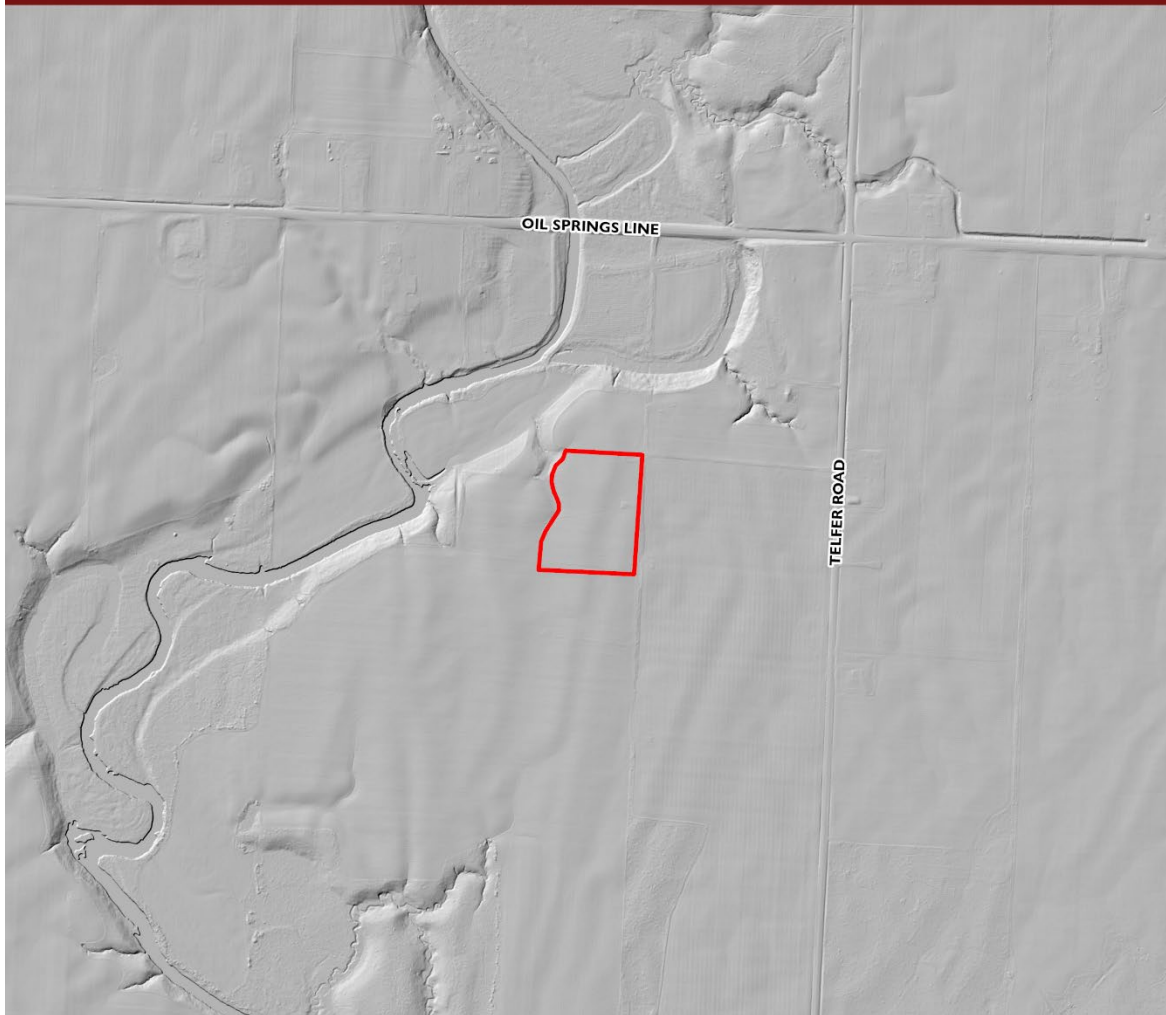
2024-141 D-E Waubuno Well Drill, St. 1-2



PROJECT LOCATION



ONTARIO DIGITAL TERRAIN MODEL (LIDAR-DERIVED)
GOVERNMENT OF CANADA (2023)



500 m

Prepared by DG 2024-05-22
Contains information licenced under the Open
Government Licence - Canada and the Open Government
Licence - Ontario

 Project Area

Line-item attachment 1.6

From: [Chasity Pilecki](#)
To: [Lynn Rosales](#); [Courtney Jackson](#)
Subject: Enbridge Gas: Proposed 2025 Waubuno Well Drilling Project, Notification
Date: Monday, August 19, 2024 3:08:24 PM
Attachments: [image001.png](#)
[AFN 2025 Waubuno Well Drilling Notification Letter.pdf](#)
[2025 Waubuno Well Drilling Project NoSCletter AFN.pdf](#)
[Map.pdf](#)
[248218_2025WellDrilling_Ad_final.pdf](#)

Good afternoon Lynn,

Please find attached the Proposed 2025 Waubuno Well Drilling Project notification, along with the invitation to the Virtual Information Session and map.

If you have any questions, please do not hesitate to contact me.

Kindest regards,

Chasity Pilecki (she/her)
Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Dive North, Chatham ON, N7M 5M1
enbridge.com
Safety. Integrity. Respect. Inclusion. High Performance



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

Via email

August 19, 2024

Lynn Rosales
Aamjiwnaang First Nation
978 Tashmoo Ave
Sarnia, ON
N7T 7H5

Project Notification re: Enbridge Gas Inc.'s Proposed 2025 Waubuno Well Drilling Project

Dear Lynn,

Enbridge Gas Inc. (Enbridge Gas) is proposing the 2025 Waubuno Well Drilling Project and has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers. For further details, please refer to the attached Figure 1 and the shape file provided. The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

The Project does not cross any Crown land and includes the following property types: private property. Enbridge Gas anticipates that a permanent easement will be required for the Project.

It is expected that the majority of adverse environmental and socio-economic effects will be construction related. These effects are expected to be temporary and transitory. The Project will be underground once construction is complete, further limiting the potential for any long-term effects. Temporary working space and laydown areas may also be required to facilitate the movement and storage of equipment necessary for construction. Enbridge Gas will work with regulators and landowners to identify and secure appropriate working space as required.

As part of the planning process for the Project, Enbridge Gas has retained an external consulting firm to undertake an environmental study of the construction and operation of the Project. The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the*

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.



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

Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023).

Enbridge Gas' preliminary work on the Project has identified the following potential authorizations:

Federal:

- N/A

Provincial:

- Ministry of Citizenship and Multiculturalism – Archaeological Assessment and Cultural Heritage Assessment.
- Ministry of the Environment, Conservation and Parks – 1. Permit to Take Water or Environmental Activity and Sector Registry 2. Endangered Species Act permits.
- St. Clair Region Conservation Authority

Municipal:

- Township of St. Clair
- County of Lambton

Other:

- N/A

Other authorizations, notifications, permits, and/or approvals may be required in addition to those identified above.

We would like to consult with your community on the proposed Project. We are interested in your community's feedback, whether in writing or through a face-to-face meeting, relating to, among other things:

- Any information the community has available that Enbridge Gas should consider when preparing documentation related to the Project;
- Any information the community may have regarding the potential adverse impacts the Project may have on your Aboriginal or treaty rights.
- Any suggestions or proposals on avoiding, minimizing or mitigating any potential adverse impacts.
- Guidance on how you would like information provided to us to be collected, stored, used and shared.

While Enbridge Gas is interested in meeting at any time during the Project development process, we would appreciate the opportunity to meet early to discuss the preliminary preferred and alternative routing identified above, any concerns the community may have with those routes and any potential adverse impacts the Project may have on your Aboriginal or treaty rights. We will forward the Environmental



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

Report for the Project for review and comment once it is available and would be pleased to participate in further meetings to discuss and address any questions or concerns. As part of Enbridge Gas' engagement on the Project, Indigenous communities will have the opportunity to participate in fieldwork and Enbridge Gas will reach out in the future with further details.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the Project, and to allow for meaningful consultation. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your team's engagement in relation to the Project.

Enbridge Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor, Indigenous Energy Policy
chloe.lazakis@ontario.ca

Please feel free to contact me at chacity.pilecki@enbridge.com or 226-229-1012 so we can set up a time to meet. You may also provide me with any feedback you may have regarding the Project in writing by September 23, 2024, if possible.

Kindest regards,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community & Indigenous Engagement, Eastern Region
Enbridge Gas Inc.
226-229-1012
chacity.pilecki@enbridge.com



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

August 19, 2024

**To: Lynn Rosales
Aamjiwnaang First Nation**

**Re: Enbridge Gas Inc.
Proposed 2025 Waubuno Well Drilling Project
Township of St. Clair (Lambton County), Ontario
Notice of Study Commencement and Virtual Public Information Session**

Dear Lynn,

I am reaching out to provide your community with the attached Notice of Study Commencement and Virtual Public Information Session for the proposed 2025 Waubuno Well Drilling Project in Lambton County.

Enbridge Gas Inc. (Enbridge Gas) has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural, and socio-economic environment, evaluate the project from a natural, cultural and socio-economic environmental perspective, outline safety measures and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of a well drilling licence under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.

As part of the initial phase of the study, we are collecting information on cultural, socio-economic, natural environment, at the proposed well sites. Examples of data being collected include information on

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.

archaeological and heritage resources, terrestrial and aquatic vegetation and wildlife, groundwater, surface water, soils, geology, existing infrastructure, and human occupancy and resource use in the area.

Indigenous engagement will play a key role in the project. As noted in the attached Notice of Study Commencement and Virtual Public Information Session, the project team is hosting a Virtual Public Information Session at <https://www.waubunowelldrilling.ca/> from **Thursday, August 29 to Friday, September 6, 2024**. Enbridge Gas looks forward to engaging with your community to ensure your community's interests are being properly understood and considered. The project team would like to invite your community to participate in the upcoming Virtual Public Information Session and provide comments regarding the proposed project. Specifically, Enbridge Gas would appreciate your input on any potential impacts that the project may have on Aamjiwnaang First Nation, including any Aboriginal and Treaty Rights, and any measures to mitigate those potential adverse impacts.

Kindly indicate whether your community is interested in participating in the engagement activities on or before **Monday, September 23, 2024**. If you are unable to respond by the above date and are intending to do so, please provide an alternative date for when the project team may expect a response.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the project, and to allow for meaningful engagement. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your community's engagement in relation to this project.

Enbridge Gas would be interested in meeting with Aamjiwnaang First Nation to share project-related information and discuss any comments or concerns you may have. If you wish to meet, please provide potential dates and times that would work best for a meeting with your community representatives. Alternatively, please advise if you do not wish to meet but would prefer to be kept informed of the project.

On behalf of the project team, thank you in advance for your consideration regarding the initial phases of the project. Please do not hesitate to contact me with any questions you may have.

Sincerely,

Chasity Pilecki

Advisor, Community & Indigenous Engagement,
Public Affairs, Communications & Sustainability
Enbridge Gas Inc.
Cell: 226-229-1012
Chasity.Pilecki@enbridge.com

Attachment: Notice of Study Commencement and Virtual Public Information Session

Proposed 2025 Waubuno Well Drilling Project
Notice of Study Commencement and Virtual Public Information Session
 TOWNSHIP OF ST. CLAIR (LAMBTON COUNTY), ONTARIO
 ENBRIDGE GAS INC.

The Study

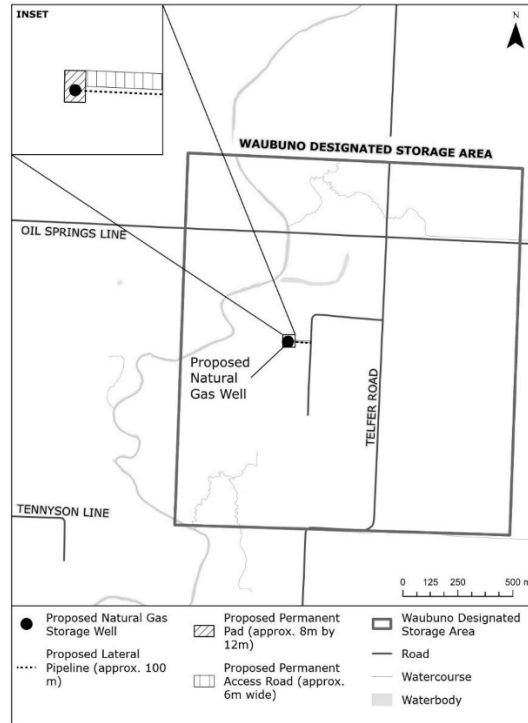
Enbridge Gas has retained Dillon Consulting to undertake an environmental study for the proposed 2025 Waubuno Well Drilling Project in Lambton County, Ontario.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 metres of 8-inch natural gas pipeline in the Waubuno Designated Storage Area (DSA) – an area of land designated by the Ontario Energy Board (OEB) under section 36.1(1)(a) of the *OEB Act*, which contains geological formations suitable for the storage of natural gas underground.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair. Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The Process

The study is being conducted in accordance with the *OEB's Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023)*. The study will review the need and justification for the project, describe the existing natural, cultural and socio-economic environment, evaluate the project from a natural, cultural, and socio-economic perspective, outline safety measures, and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.



Invitation to the Community

Stakeholder and Indigenous consultation is a key component of this study. Members of the general public, landowners, government agencies, Indigenous communities, and other interested parties are invited to participate in the study. We are hosting a Virtual Public Information Session to provide you with an opportunity to review the project and provide input.

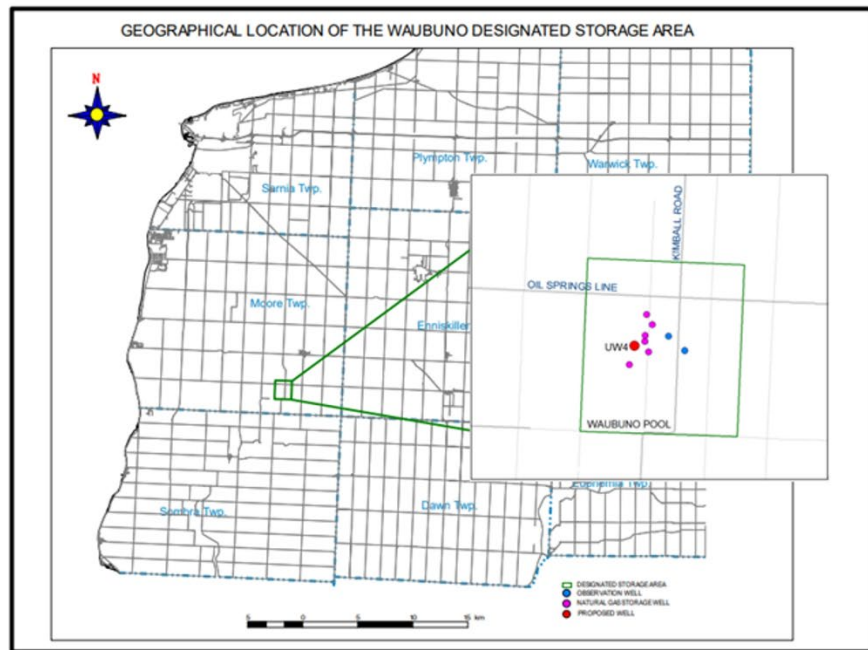
To access the Virtual Public Information Session, visit: www.WaubunoWellDrilling.ca from **Thursday, August 29, 2024 to Friday, September 6, 2024**.

If you are interested in participating or would like to provide comments, please visit the Virtual Public Information Session or contact one of the individuals listed below through the project email. The last day to submit comments for consideration in the draft environmental study is **September 23, 2024**. You can also visit the **Enbridge Gas Project Website** at www.enbridgegas.com/2025WellProject.

Project Contacts
 Bill Olds
 Project Manager
 Dillon Consulting Limited

Project Email:
 2025waubunowellproject@dillon.ca
Telephone: 905-905-5521





Line-item attachment 1.27

From: [Lauren Whitwham](#)
To: [lrosales@aamjiwnaang.ca](#); [cjackson@aamjiwnaang.ca](#); [abeveridge@aamjiwnaang.ca](#)
Cc: [Chasity Pilecki](#)
Subject: 2025 Waubuno Project Final ER
Date: Monday, October 7, 2024 4:46:17 PM

Hi Lynn,

I am reaching out, on behalf of Chasity who is on vacation. Enbridge Gas wanted to let you know that the Environmental Report (ER) for the 2025 Waubuno Well Drilling Project is now available for review.

Enbridge Gas is proposing to drill one new natural gas storage well and construct 100 m of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA), in the township of St. Clair, Ontario.

With a favourable report from the Ontario Energy Board (OEB) to the Minister of Natural Resources, pursuant to Section 40(1) of the OEB Act, drilling of the well and construction of the pipeline are anticipated to begin in spring of 2025.

In accordance with the OEB's Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition (2023), Enbridge Gas is submitting the ER for the Project for OPCC review. Enbridge Gas has retained Dillon Consulting Limited, an independent environmental consultant, to complete the ER for the proposed project.

The ER can be found at the following link using the provided credentials:

URL: <https://dl.dillon.ca/index.php/login>

Username: Enbridge_Public

Password: HhEXiE2789ns

We are requesting feedback by **November 18, 2024**.

Capacity funding is available to enable you to engage in timely technical reviews of documents, participation in field work associated with proposed projects, and to engage in meaningful consultation. If you could provide me with a quote or proposal, that would be greatly appreciated.

If you require any further information at this time, please do not hesitate to contact Chasity.

Thanks,
Lauren

Line-item attachment 2.0



Waubuno Notification - May 2024 - CKSPFN.pdf
168 KB



Map.pdf
204 KB

Sent: Tuesday, May 21, 2024 4:04 PM

To: Kimberly Bressette <Kimberly.Bressette@kettlepoint.org>; verna.george@kettlepoint.org; Consultation <consultation@kettlepoint.org>

Subject: Early Notification: 2025 Waubuno Well Drilling Project

Good afternoon,

This email is to notify you of a planned upcoming project. The project does not trigger an LTC, however I am engaging based on Enbridge's Lifecycle Engagement protocols and keeping you informed of our work in the area.

Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

Enbridge Gas has reached out to the Ministry of Energy for delegation of the Duty to Consult and we expect to hear from them in the next couple of weeks.

There will also be upcoming Stage 2 Archaeology fieldwork and TMHC will be reaching out for monitoring opportunities.

Please see the attached letter to learn more.

Kindest regards,

Chasity Pilecki (she/her)

Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability

—



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Drive North, Chatham ON, N7M 5M1

enbridge.com

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Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

May 21, 2024

Chippewas of Kettle and Stony Point
6247 Indian Lane
Lambton Shores, ON N0N 1J2

Dear Recipient,

Enbridge Gas – Notice of Upcoming Project for the 2025 Waubuno Well Drilling Project

This letter is to notify you of a proposed upcoming project in your area.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

The drilling of well is needed to replace the deliverability lost in the Waubuno Storage Pool due to well relines and abandonments.

The 2025 Waubano Well Drilling Project is proposed to be undertaken pending a positive recommendation from the Ontario Energy Board (OEB) to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the OEB Act.

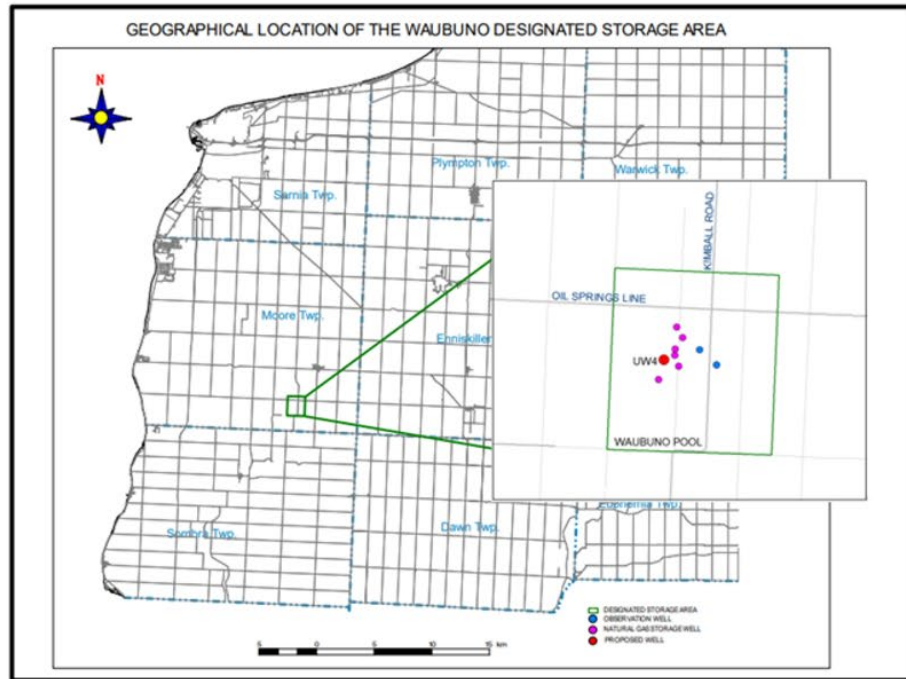
In support of this upcoming OEB application, Enbridge Gas will be undertaking environmental studies in 2024 to review the proposed construction and operation of the project. The environmental studies will include a consultation program, impact assessment, and a cumulative effects assessment.

Enbridge Gas is committed to undertaking consultation with Indigenous Communities and local stakeholders as an integral component of the planning process. Additional details regarding the project and how to become involved during public consultation will be provided in future correspondence. If you have any questions or comments during the development stages of this project, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community and Indigenous Engagement
Enbridge Gas
Chasity.Pilecki@enbridge.com
226-229-1012



Line-item attachment 2.1

From: Liam Browne <lbrowne@tmhc.ca>

Sent: Friday, May 24, 2024 9:17 AM

To: Kimberly.Bressette@kettlepoint.org <Kimberly.Bressette@kettlepoint.org>; Verna George <Verna.George@kettlepoint.org>; Consultation <Consultation@kettlepoint.org>

Cc: Matthew Beaudoin <mbeaudoin@tmhc.ca>; Jennifer Donnelly <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Bill Olds <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com <Chasity.Pilecki@enbridge.com>

Subject: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Chief Bressette and Verna,

TMHC has been contacted through Dillon Consulting Limited to complete a Stage 1-2 archaeological assessment for Enbridge Gas Inc.'s Waubuno Well Drilling Project in the Township of St. Clair, Lambton County. The project area is roughly 7 acres in size (see attached Fieldmap - <https://maps.app.goo.gl/GfbPD6yAyHuSxycW7>).

At this point, there are no archaeological sites registered within 1 km of the project area. The project area is located on level ground above the valley associated with Bear Creek. As the project area is located within an active agricultural field, it will be assessed via pedestrian survey. We are anticipating completing this work on June 7. Would the Chippewas of Kettle and Stony Point like to be involved in this fieldwork?

If you have any questions about the specifics of Enbridge's project please let us know. If there are any questions regarding the archaeological assessment I would be happy to discuss further. Contracts for this project will be signed by Enbridge (Chasity.Pilecki@enbridge.com).

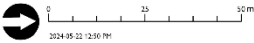
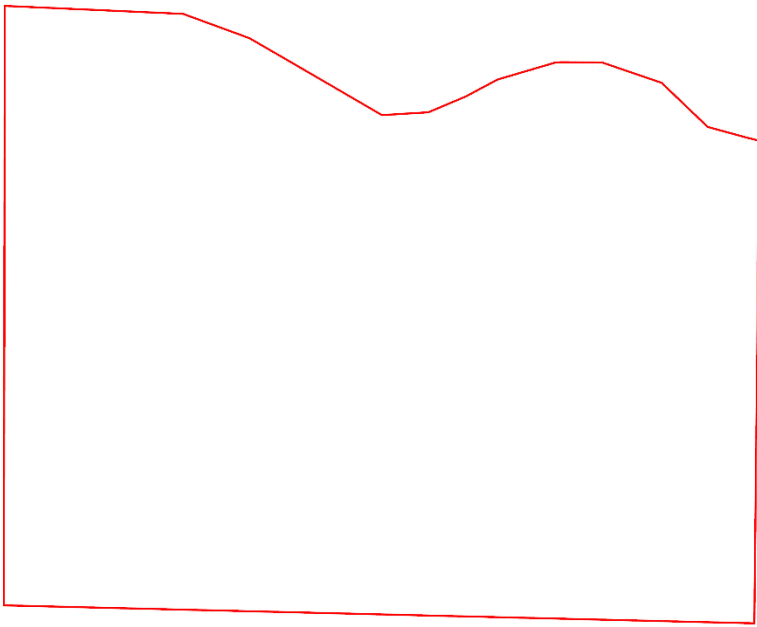
Best,
Liam



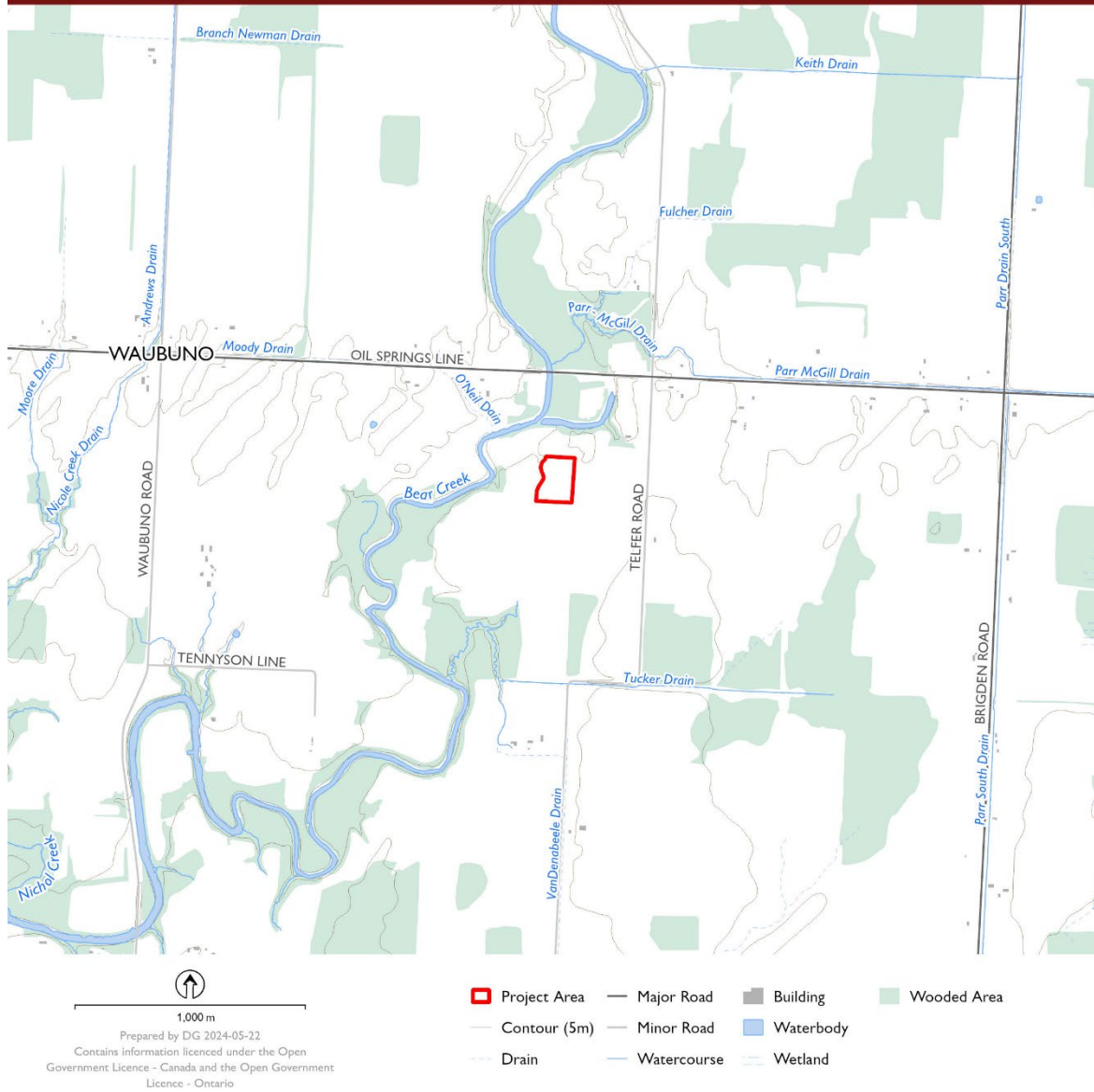
Liam Browne, MA, P1048
Pipeline Archaeological Projects Unit Manager
lbrowne@tmhc.ca
519-282-0095

TMHC Inc.
1108 Dundas Street, Unit 105
London, ON | N5W 3A7
www.tmhc.ca
519-641-7222

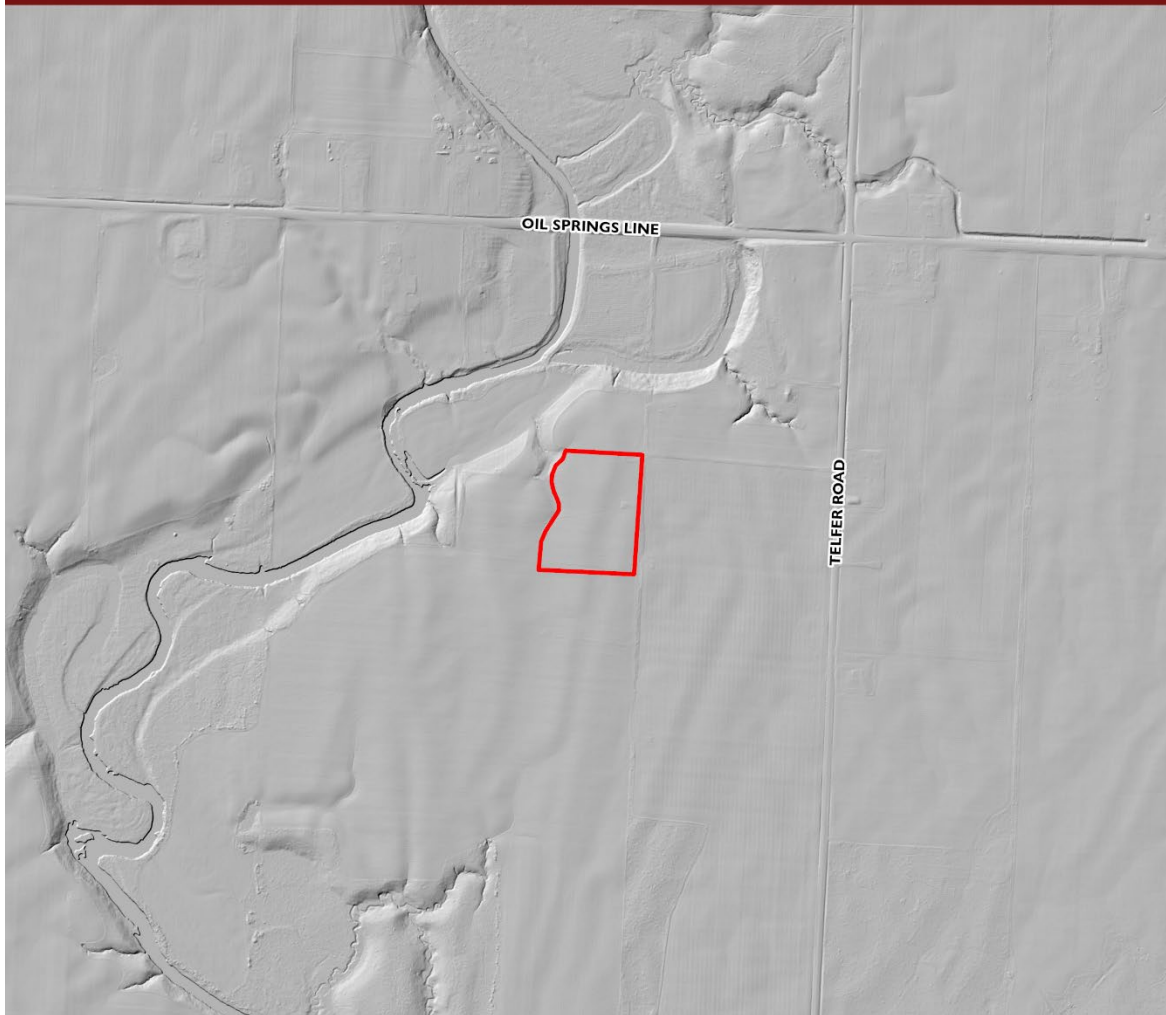
2024-141 D-E Waubuno Well Drill, St. 1-2



PROJECT LOCATION



ONTARIO DIGITAL TERRAIN MODEL (LIDAR-DERIVED)
GOVERNMENT OF CANADA (2023)



500 m

Prepared by DG 2024-05-22
Contains information licenced under the Open
Government Licence - Canada and the Open Government
Licence - Ontario

 Project Area

Line-item attachment 2.3

From: [Consultation](#)
To: [Chasity Pilecki](#)
Cc: [Chief Kimberly Bressette](#); [Verna George](#); jessica.wakefield@threefires.com
Subject: [External] Re: Early Notification: 2025 Waubuno Well Drilling Project
Date: Monday, May 27, 2024 9:09:51 AM
Attachments: [image001.png](#)
[Waubuno Notification - May 2024 - CKSPFN.pdf](#)
[Map.pdf](#)

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Hi Chasity,

Thank you for the notification. We look forward to participating in upcoming fieldwork and are interested in learning more about the cumulative effects assessment and impact assessment and how TFG/CKSPFN might be involved in those studies.

Thanks,
Jess

Line-item attachment 2.14

From: [Chasity Pilecki](#)
To: verna.george@kettlepoint.org; [Consultation](#)
Subject: Enbridge Gas: Proposed 2025 Waubuno Well Drilling Project, Notification
Date: Monday, August 19, 2024 3:10:36 PM
Attachments: [CKSPFN 2025 Waubuno Well Drilling Notification Letter.pdf](#)
[2025 Waubuno Well Drilling Project NoSCletter CKSPFN.pdf](#)
[Map.pdf](#)
[248218 2025WellDrilling_Ad_final.pdf](#)
[image001.png](#)

Good afternoon,

Please find attached the Proposed 2025 Waubuno Well Drilling Project notification, along with the invitation to the Virtual Information Session and map.

If you have any questions, please do not hesitate to contact me.

Kindest regards,

Chasity Pilecki (she/her)
Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Dive North, Chatham ON, N7M 5M1

[enbridge.com](https://www.enbridge.com)

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

Via email

August 19, 2024

Chippewas of Kettle and Stony Point First Nation
6265 Indian Lane
Lambton Shores, ON
N0N 1J1

Project Notification re: Enbridge Gas Inc.'s Proposed 2025 Waubuno Well Drilling Project

Dear Sir or Madame,

Enbridge Gas Inc. (Enbridge Gas) is proposing the 2025 Waubuno Well Drilling Project and has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers. For further details, please refer to the attached Figure 1 and the shape file provided. The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

The Project does not cross any Crown land and includes the following property types: private property. Enbridge Gas anticipates that a permanent easement will be required for the Project.

It is expected that the majority of adverse environmental and socio-economic effects will be construction related. These effects are expected to be temporary and transitory. The Project will be underground once construction is complete, further limiting the potential for any long-term effects. Temporary working space and laydown areas may also be required to facilitate the movement and storage of equipment necessary for construction. Enbridge Gas will work with regulators and landowners to identify and secure appropriate working space as required.

As part of the planning process for the Project, Enbridge Gas has retained an external consulting firm to undertake an environmental study of the construction and operation of the Project. The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023).

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.



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

Enbridge Gas' preliminary work on the Project has identified the following potential authorizations:

Federal:

- N/A

Provincial:

- Ministry of Citizenship and Multiculturalism – Archaeological Assessment and Cultural Heritage Assessment.
- Ministry of the Environment, Conservation and Parks – 1. Permit to Take Water or Environmental Activity and Sector Registry 2. Endangered Species Act permits.
- St. Clair Region Conservation Authority

Municipal:

- Township of St. Clair
- County of Lambton

Other:

- N/A

Other authorizations, notifications, permits, and/or approvals may be required in addition to those identified above.

We would like to consult with your community on the proposed Project. We are interested in your community's feedback, whether in writing or through a face-to-face meeting, relating to, among other things:

- Any information the community has available that Enbridge Gas should consider when preparing documentation related to the Project;
- Any information the community may have regarding the potential adverse impacts the Project may have on your Aboriginal or treaty rights.
- Any suggestions or proposals on avoiding, minimizing or mitigating any potential adverse impacts.
- Guidance on how you would like information provided to us to be collected, stored, used and shared.

While Enbridge Gas is interested in meeting at any time during the Project development process, we would appreciate the opportunity to meet early to discuss the preliminary preferred and alternative routing identified above, any concerns the community may have with those routes and any potential adverse impacts the Project may have on your Aboriginal or treaty rights. We will forward the Environmental Report for the Project for review and comment once it is available and would be pleased to participate in further meetings to discuss and address any questions or concerns. As part of Enbridge Gas'



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

engagement on the Project, Indigenous communities will have the opportunity to participate in fieldwork and Enbridge Gas will reach out in the future with further details.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the Project, and to allow for meaningful consultation. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your team's engagement in relation to the Project.

Enbridge Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor, Indigenous Energy Policy
chloe.lazakis@ontario.ca

Please feel free to contact me at chasity.pilecki@enbridge.com or 226-229-1012 so we can set up a time to meet. You may also provide me with any feedback you may have regarding the Project in writing by September 23, 2024, if possible.

Kindest regards,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community & Indigenous Engagement, Eastern Region
Enbridge Gas Inc.
226-229-1012
chasity.pilecki@enbridge.com



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

August 19, 2024

To: Chippewas of Kettle and Stony Point First Nation

**Re: Enbridge Gas Inc.
Proposed 2025 Waubuno Well Drilling Project
Township of St. Clair (Lambton County), Ontario
Notice of Study Commencement and Virtual Public Information Session**

Dear Chippewas of Kettle and Stony Point First Nation,

I am reaching out to provide your community with the attached Notice of Study Commencement and Virtual Public Information Session for the proposed 2025 Waubuno Well Drilling Project in Lambton County.

Enbridge Gas Inc. (Enbridge Gas) has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural, and socio-economic environment, evaluate the project from a natural, cultural and socio-economic environmental perspective, outline safety measures and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of a well drilling licence under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.

As part of the initial phase of the study, we are collecting information on cultural, socio-economic, natural environment, at the proposed well sites. Examples of data being collected include information on

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.

archaeological and heritage resources, terrestrial and aquatic vegetation and wildlife, groundwater, surface water, soils, geology, existing infrastructure, and human occupancy and resource use in the area.

Indigenous engagement will play a key role in the project. As noted in the attached Notice of Study Commencement and Virtual Public Information Session, the project team is hosting a Virtual Public Information Session at <https://www.waubunowelldrilling.ca/> from **Thursday, August 29 to Friday, September 6, 2024**. Enbridge Gas looks forward to engaging with your community to ensure your community's interests are being properly understood and considered. The project team would like to invite your community to participate in the upcoming Virtual Public Information Session and provide comments regarding the proposed project. Specifically, Enbridge Gas would appreciate your input on any potential impacts that the project may have on the Chippewas of Kettle and Stony Point First Nation, including any Aboriginal and Treaty Rights, and any measures to mitigate those potential adverse impacts.

Kindly indicate whether your community is interested in participating in the engagement activities on or before **Monday, September 23, 2024**. If you are unable to respond by the above date and are intending to do so, please provide an alternative date for when the project team may expect a response.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the project, and to allow for meaningful engagement. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your community's engagement in relation to this project.

Enbridge Gas would be interested in meeting with the Chippewas of Kettle and Stony Point First Nation to share project-related information and discuss any comments or concerns you may have. If you wish to meet, please provide potential dates and times that would work best for a meeting with your community representatives. Alternatively, please advise if you do not wish to meet but would prefer to be kept informed of the project.

On behalf of the project team, thank you in advance for your consideration regarding the initial phases of the project. Please do not hesitate to contact me with any questions you may have.

Sincerely,

Chasity Pilecki

Advisor, Community & Indigenous Engagement,
Public Affairs, Communications & Sustainability
Enbridge Gas Inc.
Cell: 226-229-1012
Chasity.Pilecki@enbridge.com

Attachment: Notice of Study Commencement and Virtual Public Information Session

Proposed 2025 Waubuno Well Drilling Project
Notice of Study Commencement and Virtual Public Information Session
 TOWNSHIP OF ST. CLAIR (LAMBTON COUNTY), ONTARIO
 ENBRIDGE GAS INC.

The Study

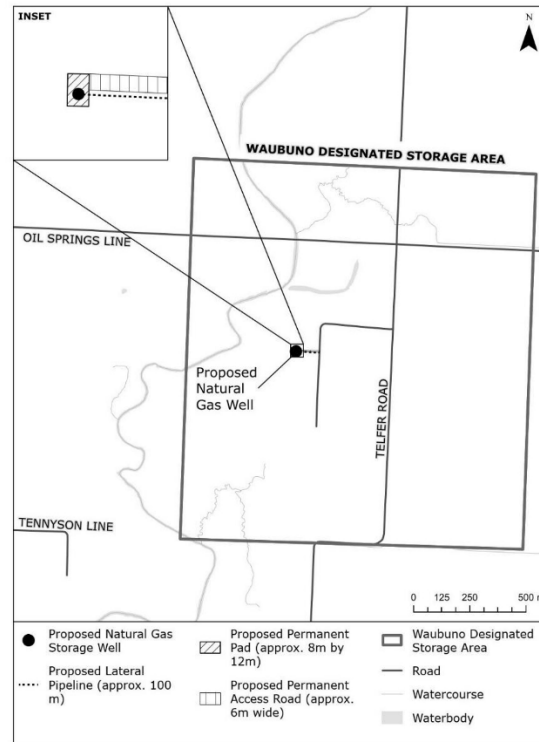
Enbridge Gas has retained Dillon Consulting to undertake an environmental study for the proposed 2025 Waubuno Well Drilling Project in Lambton County, Ontario.

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The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair. Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The Process

The study is being conducted in accordance with the *OEB's Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023)*. The study will review the need and justification for the project, describe the existing natural, cultural and socio-economic environment, evaluate the project from a natural, cultural, and socio-economic perspective, outline safety measures, and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.



Invitation to the Community

Stakeholder and Indigenous consultation is a key component of this study. Members of the general public, landowners, government agencies, Indigenous communities, and other interested parties are invited to participate in the study. We are hosting a Virtual Public Information Session to provide you with an opportunity to review the project and provide input.

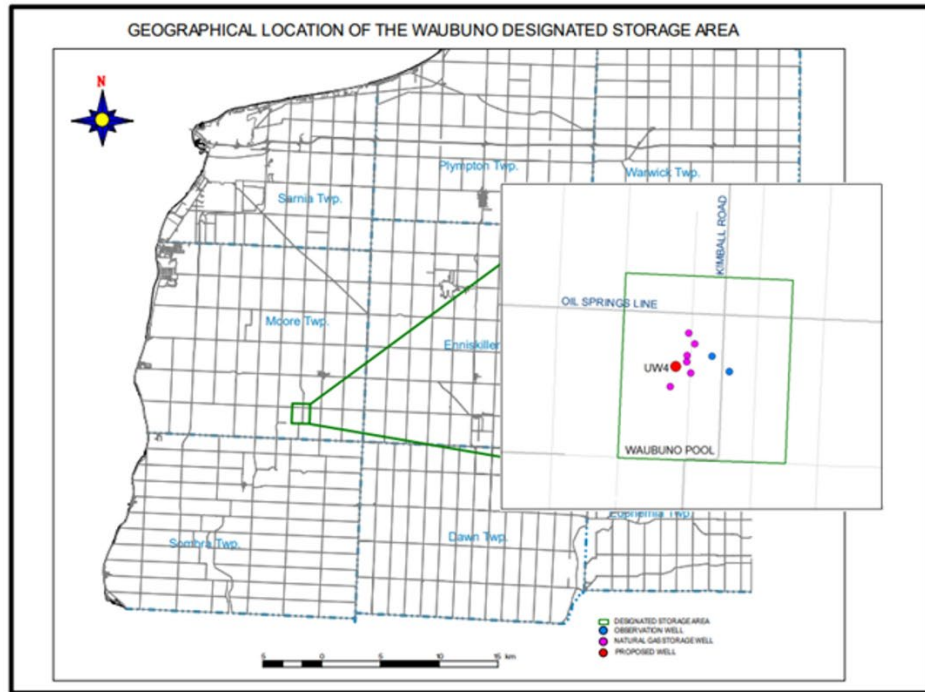
To access the Virtual Public Information Session, visit: www.WaubunoWellDrilling.ca from **Thursday, August 29, 2024 to Friday, September 6, 2024**.

If you are interested in participating or would like to provide comments, please visit the Virtual Public Information Session or contact one of the individuals listed below through the project email. The last day to submit comments for consideration in the draft environmental study is **September 23, 2024**. You can also visit the **Enbridge Gas Project Website** at www.enbridgegas.com/2025WellProject.

Project Contacts
Bill Olds
 Project Manager
 Dillon Consulting Limited

Project Email:
 2025waubunowellproject@dillon.ca
Telephone: 905-905-5521





Line-item attachment 2.18

From: [Lauren Whitwham](#)
To: [Jessica Wakefield](#); [Consultation](#)
Cc: [Chasity Pilecki](#)
Subject: 2025 Waubuno Project Final ER
Date: Monday, October 7, 2024 4:51:09 PM

Hi there,

I am reaching out, on behalf of Chasity who is on vacation. Enbridge Gas wanted to let you know that the Environmental Report (ER) for the 2025 Waubuno Well Drilling Project is now available for review.

Enbridge Gas is proposing to drill one new natural gas storage well and construct 100 m of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA), in the township of St. Clair, Ontario.

With a favourable report from the Ontario Energy Board (OEB) to the Minister of Natural Resources, pursuant to Section 40(1) of the OEB Act, drilling of the well and construction of the pipeline are anticipated to begin in spring of 2025.

In accordance with the OEB's Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition (2023), Enbridge Gas is submitting the ER for the Project for OPCC review. Enbridge Gas has retained Dillon Consulting Limited, an independent environmental consultant, to complete the ER for the proposed project.

The ER can be found at the following link using the provided credentials:

URL: <https://dl.dillon.ca/index.php/login>

Username: Enbridge_Public

Password: HhEXiE2789ns

We are requesting feedback by **November 18, 2024**.

Capacity funding is available to enable you to engage in timely technical reviews of documents, participation in field work associated with proposed projects, and to engage in meaningful consultation. If you could provide Chasity with a quote or proposal, that would be greatly appreciated.

If you require any further information at this time, please do not hesitate to contact Chasity.

Thanks,
Lauren

Line-item attachment 2.22

From: [Chasity Pilecki](#)
To: [Consultation](#)
Subject: Capacity Funding - Waubuno Well Drilling Project
Date: Wednesday, October 30, 2024 10:11:27 AM
Attachments: [Capacity Funding Letter TFG Waubuno Well Drilling - October 2024.pdf](#)
[image001.png](#)

Good morning,

Please find attached Capacity Funding Letter for the Waubuno Well Drilling Project.

If you have any questions, please don't hesitate to contact me.

Kindest regards,

Chasity Pilecki (she/her)
Senior Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Dive North, Chatham ON, N7M 5M1

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Line-item attachment 2.25

From: [Jessica Wakefield](#)
To: [Chasity Pilecki](#)
Cc: [Lauren Whitwham](#); [Consultation](#); [Michael George](#); [Kimberly Bressette](#); [Verna George](#)
Subject: [External] Re: 2025 Waubuno Project Final ER
Date: Wednesday, November 20, 2024 2:50:03 PM
Attachments: [image001.png](#)
[TFG CKSPFN Comments WaubunoER.pdf](#)

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Hi Chasity,

Please find attached our response letter for the Waubuno Project.

Thanks,

Jess



November 20, 2024

Chasity Pilecki

Senior Advisor, Community and Indigenous Engagement

Enbridge Gas Inc.

chasity.pilecki@enbridge.com

Re: 2025 Waubuno Well Drilling Project – Environmental Report – Comments

Dear Chasity,

The Three Fires Group (TFG), on behalf of the Chippewas of Kettle and Stony Point First Nation (CKSPFN) have worked with a technical consultant to complete a thorough review of the Environmental Report (ER). We are appreciative of the opportunity to submit the following in response to the draft environmental report.

Some initial, high-level comments/questions are:

- As we continue to develop our relationship with Enbridge, we would like to see more opportunity to identify culturally important wildlife, plants, and medicines and assess potential impacts to rights and interests in the initial stages of the environmental report.
- Is one site visit and a background review suitable for the identification of Species at Risk? We are looking for a bit more information on the expectations around Species at Risk for this project, or other projects this size, and how TFG might be involved in the future.
- Cumulative effects are a major concern for CKSPFN. We note that including this consideration in the environmental report is a good first step, but we expect more to be covered within this assessment on future projects. The spatial boundary should be expanded to include nearby surface water and should consider the upstream and downstream effects of fugitive emissions. At this point, we would like to better understand the requirements of cumulative effects assessment for a project of this nature and more information on the frequency and methods for monitoring, inspections and leak surveys during project construction and operation.
- We are interested in reviewing the Environmental Protection Plan and Well Drilling Program to better understand mitigation measures to reduce adverse effects of the project.



Additional comments are presented in the table below:

Reference	Issue	Comment/Request for Proponent
Executive Summary p. xii 6.2.6 Wildlife and Wildlife Habitat p. 76	The ER states that <i>"The Project components are situated in rural agricultural land, previously disturbed by agricultural activities, which greatly reduces the potential for adverse effects to the natural environment"</i>. Agricultural land provides habitat for a host of species that are adapted to an agricultural landscape, including SAR (e.g., barn swallow, grassland birds) and culturally important wildlife (e.g., bald eagle, white-tailed deer), some of which were observed within the study area. Further, gravel road shoulders can provide habitat to ground-nesting birds, basking areas for reptiles, and nesting habitat for turtles. Suggesting that industrial development has a greatly reduced impact merely because it is sited in an agricultural landscape is misleading and minimizes potential impacts of the proposed project.	The Proponent should acknowledge the importance of agricultural landscapes for wildlife an wildlife habitat in highly fragmented and disturbed areas in the Township of St. Clair by removing these statements from the ER.
2.1.1 Identification of Study Area and Environmental Inventory p. 9	A 125 m buffer around all project components was used to define the boundaries of the study area. According to the ER, this area was <i>"determined to be most likely to be directly or indirectly affected by the Project"</i> . No further detail was provided as to how this determination was made. Without more detailed rationale, CKSPFN cannot be assured that all potential project impacts were captured in the effects assessment.	The Proponent should provide additional rationale (e.g., based on best available literature, Indigenous Knowledge, case studies) that a 125 m buffer around all project components is inclusive of all areas likely to be directly or indirectly affected by the proposed project.
2.1.2.5 Potential Project Interactions Table 2-3 p.19	Table 2.3 lists potential project interactions with the physical, natural, and socio-economic environment. The Proponent has not identified potential project interactions with the following: • Groundwater during operations; • Vegetation during construction; and • Wildlife and wildlife habitat during construction. It is unclear why these project interactions were not included in Table 2-3. For example,	The Proponent should update the ER to reflect potential project interactions with groundwater during operations, and vegetation, wildlife and wildlife habitat during construction.



	the ER states that <i>"Wildlife habitat has been preliminarily identified within the Study Area through the initial field assessment and ELC mapping"</i>. Any vegetation removals during construction will interact with vegetation (e.g., trees) and potentially wildlife and wildlife habitat (e.g., grassland birds, bats). Furthermore, during operations, <i>"loss of integrity, accidents, and production interruptions increases and may result in environmental impacts (for example, greenhouse gas emissions and contamination of surface and groundwater)"</i>.	
4.2.2 Aquatic Environment p. 42 4.2.5.1 Ecological Land Classification p. 44 Appendix K Table K-1 p. K-1	The ER regularly refers to the <i>"preliminary field investigation completed on June 18, 2024"</i>. At this site visit, the following was completed: • Verification of watercourse, wetland, and woodland features; • Ecological Land Classification; • Vegetation Inventory; and • Record of incidental wildlife. Considering the results of this site visit (e.g., observations of SAR and culturally important wildlife) and the background review, it appears that more detailed information of the site conditions is warranted. For example, during the preliminary field investigation many plants were only identified to genus. Without more detailed information about the environmental features, wildlife, and wildlife habitat present on site (e.g., across seasons), CKSPFN cannot be assured that the effects assessment and proposed mitigation measures are sufficient to protect CKSPFN Treaty and Aboriginal rights.	The Proponent should provide information as to why the following were not completed as part of the assessment of the study area: • Breeding Bird Surveys; • Amphibian calling surveys; • Cavity assessment/bat maternity roost surveys; • Multi-season vegetation inventory; and • Headwater drainage features assessment (to identify ephemeral wetlands/watercourses).
4.2.5.1 Ecological land Classification p. 43	A treed hedgerow was identified during the preliminary field investigation along the existing gravel access road. Also, a cultural thicket/meadow is located to the north of the proposed natural gas storage well, which appears to be connected to the riparian areas of Bear Creek. It is unclear from the ER whether the vegetation in these ELC communities will be removed or retained during project works. This is important to note in the ER to accurately determine potential impacts to vegetation and wildlife.	The Proponent should: • Provide an opportunity for CKPSFN monitors to complete an ecological assessment/site visit; • Describe in the ER the extent of removal/disturbance required to complete the proposed project;



	Hedgerows and cultural thicket/meadow can provide important habitat for SAR (e.g., eastern foxsnake, bats, Prothonotary warbler) and culturally important wildlife (e.g., white-tailed deer). Furthermore, landscape features that convey ecological connectivity to relatively undisturbed areas (e.g., Bear Creek) are very important to protect in an area that is highly fragmented.	• Retain a certified arborist to complete a tree inventory; and • Develop a Tree Protection and Preservation Plan.
4.2.6.1 Fauna pp. 46-47	For each wildlife grouping (e.g., birds, mammals, herptiles, etc.) the proponent indicates the number of SAR and Species of Conservation Concern (SCC) that have potential to occur in the vicinity of the study area. However, the Proponent incorrectly excludes species listed as Special Concern under the <i>Endangered Species Act</i> as "provincially listed SAR". Special Concern species are considered SAR under provincial legislation, although they do not receive automatic protection under the <i>Endangered Species Act</i>.	The Proponent should update the ER to reflect that species listed as Special Concern under the <i>Endangered Species Act</i> are provincially listed SAR.
4.2.6.2 Incidental Wildlife Observations p. 47	During the June 2024 preliminary field investigation, data on incidental wildlife was collected. As part of this investigation, barn swallow (Special Concern) and bald eagle (listed as Special Concern at the time of site visit) were observed. However, there is no information provided in the ER about the location of these observations, the number of individuals observed, or the animals' behaviour. The ER states that "<i>with the exception of Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>)... no SAR [Species at Risk] or SCC [Species of Conservation Concern] were observed in the study area</i>". This statement is misleading and undermines the importance of SAR observations within the study area (e.g., barn swallow).	The Proponent should provide a figure in the ER displaying the location of incidental wildlife observations of SAR and culturally important wildlife. This should also include indication of the number of individuals observed and their behaviour. The Proponent should also remove the statement "<i>with the exception of Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>)... no SAR or SCC were observed in the study area</i>" from the ER. It should be replaced with a more accurate statement. For example, "<i>Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>), which are listed as Special Concern provincially under the SARO list (O. Reg. 230/08) were observed in the study area</i>".



4.2.6.3 Wildlife Habitat pp. 47-49	In the ER, the Proponent concludes that there is no candidate Significant Wildlife Habitat (SWH) within the study area. However, the Proponent has not provided sufficient rationale (e.g., a SWH screening table) to provide assurance that candidate SWH has been appropriately identified. This includes, but is not limited to: • Waterfowl Stopover and Staging Areas: CUM1 (Cultural Meadow) is present; evidence of annual spring flooding is unknown from the ER. • Reptile Hibernaculum: Habitat may be found in any ecosite other than very wet ones; presence of burrows, rock crevices and other features that go below the frost line is unclear from the ER. • Colonially Nesting Bird Breeding Habitat: CUM1 (Cultural Meadow) is present; proximity to Bear Creek and open fields with scattered trees is present. • Open Country Bird Breeding Habitat: CUM1 (Cultural Meadow) is present, grasshopper sparrow and savannah sparrow are present in background review. • Special Concern and Rare Wildlife Species: 12 identified during background review. This information is important to provide assurance to CKPSFN that wildlife habitat, including culturally important wildlife habitat, is appropriately identified and protected as Significant Wildlife Habitat, where applicable.	The Proponent should provide additional information in the ER regarding the identification of SWH within the study area. This could be achieved by providing an SWH screening table. The final ER should be provided to CKSPFN for review and comment.
4.2.7.2 Potential for Species at Risk in the Study Area p. 50	The ER identified 18 provincially-listed SAR with known occurrences in the vicinity of the study area. However, "<i>it was determined that the Study Area does not have the potential to support SAR or their habitat</i>". It is unclear how the Proponent has made this determination. The Proponent has not provided sufficient rationale (e.g., a SAR screening table) to provide CKSPFN with assurance that SAR and	The Proponent should: • Provide additional information in the final ER regarding the identification of SAR and SAR habitat within the study area. This could be achieved by providing an SAR screening table.



	SAR habitat has been appropriately identified. For example: - Barn swallow (Special Concern) was observed during the site visit, and requires open habitats (including agricultural crops) for foraging habitat. Breeding Bird Surveys do not appear to have been completed to confirm breeding status. - Eastern foxsnake (Endangered) can use hedgerow habitat. The survey protocol for SAR snakes in Ontario does not appear to have been completed. - Eastern Meadowlark (Threatened) can nest in row crop fields such as corn and soybean (COSEWIC, 2011). The Survey Protocol for Eastern Meadowlark in Ontario does not appear to have been completed. The Proponent also does not appear to have completed targeted SAR surveys at the appropriate times of year (e.g., Survey protocol for Ontario's species at risk snakes; Breeding Bird Surveys for bobolink and eastern meadowlark; Survey Protocol for Eastern Meadowlark in Ontario).	- Complete targeted SAR surveys for species with a moderate to high probability of being present within the study area; and - Provide the final ER to CKSPFN for review and comment.
4.2.7.2 Potential for Species at Risk in the Study Area p. 51	It is unclear why grassland bird habitat is only identified to the east of the road within the study area, and not the entire OAGM1 ecosite. From aerial imagery, this area appears contiguous. It is important that all areas that could provide habitat for SAR grassland birds are accounted for. For example, Eastern Meadowlark (provincially Threatened) is known to nest in row crop fields such as corn and soybean (COSEWIC, 2011).	The Proponent should provide clarity on why only the portion of the OAGM1 ecosite east of the road is potential habitat for SAR grassland birds. Otherwise, the western portion should also be included in mapping of potential SAR habitat.
5.0 Site Selection Process p. 62	No site selection constraints analysis or alternatives assessment was conducted for the proposed project. The Proponent states this is because there was a necessity to locate the well within ideal geology in the Designated Storage Area. However, no mapping is provided in the ER to show the areas within the Designated Storage Area with ideal geologic conditions for subsurface storage of natural	The Proponent should: - Provide mapping of areas with ideal geology within the Designated Storage Area; and - Complete an assessment of alternatives to the



	gas. Further, there should be an assessment of alternatives that includes a "do nothing" option.	proposed location, including a "do nothing" alternative.
6.1.1 Surficial Geology and Soil	The Proponent proposed a series of mitigation measures to address impacts of surficial geology, soil, and the atmosphere. However, there are important details that are not included in the ER. These are: • The frequency that Erosion and Sediment Control (ESC) measures will be monitored; • The type of dust suppressant that will be used (e.g., water or another chemical); • Requirements for machinery to arrive on site in clean condition following clean equipment protocols (e.g., Halloran et al., 2016). • Plans for the revegetation and remediation of the construction work area and after project decommissioning.	CKSPFN is interested in learning more about the following: • Indicate the frequency that ESC measures will be monitored; • Indicate the type of dust suppressant that will be used; • Ensure equipment arrives on site in clean condition and according to standard protocols; and • Provide more details in the ER regarding revegetation and remediation plans for the site.
6.1.4 Groundwater p. 69	According to the ER, dewatering may be required to facilitate construction. The Proponent describes mitigation measures to protect groundwater; however, there are additional details that should be described to help provide assurance to CKPSFN that groundwater quality and quantity will be protected. These include: • Where excess water will be discharged during dewatering; • The rate and amount of water that will be removed; • How groundwater quality will be monitored throughout the construction and operations phases; and • How the Water Well Monitoring Program survey radius of 1 km was determined. Further, the Proponent should require that vehicles and machinery are refueled >30 m away from surface water bodies and natural areas.	Proponent should update the ER to: • Require refueling away from surface water bodies and natural areas; • Describe where excess water will be discharged to during dewatering; • Describe the rate and amount of water that will be removed; • Describe how the Water Well Monitoring Program survey radius of 1 km was determined; and • Describe how groundwater quality will be monitored throughout the operations phase.



4.2.2 Aquatic Environment p. 42 6.22 Aquatic Environment p. 73	While it is understood that there were no mapped or unmapped aquatic features identified within the study area, Bear Creek is approximately 275 m from the north and east of the proposed well. Bear Creek has potential to support multiple aquatic SAR and is mapped as critical habitat for two SAR mussels. Mussels can be very sensitive to changes in water quality; thus, it is very important that surface and groundwater flows and water quality are maintained to Bear Creek throughout the project. Although it is outside of the study area, it may be advisable to conduct water quality monitoring of Bear Creek in proximity to the proposed project.	The Proponent should: • Describe how surface and groundwater flows to Bear Creek will be maintained throughout the construction phase of the Project; • Complete a Headwater Drainage Features Assessment to identify whether the study area contains temporary small streams, swales, and/or wetland features that capture water and transport it to Bear Creek; and • Consider conducting water quality monitoring of Bear Creek in proximity to the proposed project.
6.2.5 Vegetation Table 6-6 p. 74	It is unclear from the ER if tree removals or removal of the hedgerow will be required to complete construction. If trees must be removed, there are additional mitigation measures that should be included in the ER to protect vegetation, wildlife, and wildlife habitat.	If trees must be removed, the Proponent should commit to: • Developing a Tree Inventory and Preservation Plan by a certified arborist; • Installing tree protection zone fencing prior to vegetation removal to protect trees from injury to limbs and soil compaction; • Not storing material or machinery within the tree protection zone; and • Avoiding tree removals during the breeding bird timing window (generally April 1 to August 31) and the bat active season (April 1 to September 30).



6.2.5 Vegetation Table 6-6 p. 74 6.2.6 Wildlife and Wildlife Habitat p. 78	According to the ER, upon completion of construction all vegetation removed or damaged should be replaced with native species appropriate for the habitat type and existing land use. It also states that the Proponent will implement measures to restore lost habitat/habitat connections.	CKSPFN is interested in reviewing and providing comment on the proposed planting/ habitat restoration plans after construction, and the reclamation plans post-operation. This will help ensure that the native vegetation planted will support culturally important wildlife and its habitat.
6.2.6 Wildlife and Wildlife Habitat p. 79	The study area has potential to support many species of reptiles, including the at-risk eastern foxsnake and Butler's gartersnake. Therefore, it is very important that the Proponent takes every reasonable step to protect reptiles and their habitat from potential impacts.	The Proponent should: • Complete targeted surveys for snake Species at Risk (e.g., OMNRF, 2016). • Include the following mitigations in the ER: - A circle check or visual inspection of machinery and equipment should be completed each morning, and after any extended period of non-use. - Follow posted speed limits. • Where possible, fence off the construction area to exclude reptiles and amphibians who may use the area for basking, breeding, and/or nesting.
4.1.2.2 Agricultural Tiel Drains p. 32 6.2.6 Wildlife and Wildlife Habitat p. 79	There is no effects assessment nor mitigation measures proposed in the ER in relation to amphibians. Three amphibian species were observed during the incidental site visit, though it is unclear where in the study area they were observed. The ER states that approximately 100% of the study area contains random agricultural tile drainage, and that unlike systematic drainage, a random drainage system is "used to drain isolated wet spots caused by springs or ponding". Isolated wet spots may be used by amphibians as breeding habitat. It is unclear from the ER whether wet spots or ponding are present in the study area.	The Proponent should: • Describe the location, number of individuals, and behaviour of amphibians observed on site during the preliminary investigation; • Complete amphibian calling surveys to better understand potential impacts to amphibians; and



		• Develop mitigation measures to protect amphibians.
7.1.1 Spatial and Temporal Boundaries	The ER states that <i>"Based on Dillon's professional experience, it was determined that the spatial boundaries for the cumulative effects assessment be established as a 1-kilometre buffer around the Project"</i>. It further notes that <i>"no reasonably foreseeable activities or development were identified within the spatial boundaries (i.e., 1-kilometre buffer) of the cumulative effects assessment"</i>. "Professional experience" is not sufficient to justify why a 1 km buffer was selected for the cumulative effects assessment. There should be literature, Indigenous Knowledge, and/or case studies to support this determination. There is existing guidance available to determine the spatial boundaries for a cumulative effects assessment (e.g., IAAC, 2023). Valued component centered spatial boundaries are generally recommended, as it allows for the most meaningful spatial boundaries to be drawn for the cumulative effects assessment.	The Proponent should provide strong rationale to support the applied 1 km buffer around the proposed project for the cumulative effects assessment. Otherwise, the final ER should include an updated cumulative effects assessment that incorporates a valued component centered spatial boundary. For example, greenhouse gas emissions (e.g., methane) and human health should be assessed at a regional scale or larger, while wildlife valued components should be assessed at a scale that is inclusive of species home range (e.g., 1500 m for eastern foxsnake, ECCC, 2020) and dispersal distance.
7.4.3 Loss of Altercation of Vegetation p. 101	The ER states that <i>"No locally or regionally adopted threshold or standard exists against which an incremental change in vegetation composition can be judged. However, given that the proposed works will occur in rural residential and active agricultural land, the amount of loss and alteration of vegetation within the Study Area is considered low in magnitude and will have a negligible contribution to the cumulative change to vegetation composition in this setting"</i>. It is unclear in the ER how much vegetation (e.g., surface area in hectares, % of each ELC community) will need to be removed to accommodate the proposed works. Even removal of a small number of trees can have a large impact in an area that is already highly fragmented. Without prior knowledge of the amount of vegetation removal required to achieve the proposed project and plans for	The Proponent should quantify and describe the amount of vegetation that will be removed to accommodate the proposed project. Once this information is known, the Proponent should redetermine the significance of loss and alternation of vegetation from the proposed project.



	reclamation, it cannot be concluded that vegetation removal will be not significant.	
7.4.4.1 Wildlife Habitat P. 102	Since activities will be conducted within the previously disturbed agricultural lands, the ER states that <i>"no new habitat fragmentation or removal is anticipated"</i> . However, it is unclear from the ER the extent of tree/vegetation removal that will be required to complete the project activities. For example, removal of the hedgerow could remove habitat for SAR bats, birds, and reptiles. The ER also concludes that <i>"the extent and frequency of disturbance in agricultural and residential landscapes, such as the Study Area, have exceeded levels at which the ecosystems are capable of supporting some wildlife populations with natural biodiversity and abundance"</i> . Without clear plans in the ER to survey for SAR and SAR habitat within the study area, and no mitigation measures specifically for culturally important wildlife, CKSPFN cannot be assured that the project's contribution to cumulative effects will not be significant.	The Proponent should reconsider the conclusions of its cumulative effects assessment once sufficient surveys have been completed to identify wildlife and wildlife habitat within the study area.
7.4.2 Increase in Air Emissions p. 100 7.4.3 Loss or Alteration of Vegetation p. 101 8.1 Accidents and Malfunctions Considered p. 106 Effects Assessment and Significance p. 110	The ER states that <i>"Failure to isolate sources of hydrocarbon early in the well-construction process or operations may result in abnormally pressurized casing strings and leaks of gas into zones that would otherwise not be gas bearing. Migration of substantial amounts of natural gas can seep into private water wells and/or shallow aquifers..."</i> . The ER does not adequately describe the risks associated with potential leaks. For example, fugitive emissions can have far-reaching human and environmental impacts. Fugitive gas (typically methane or volatile organic compounds) released by leaky infrastructure can be a significant source of greenhouse gas emissions. Some fugitive gas can contribute to the formation of ground-level ozone, which can negatively impact wildlife, plants, and human health (Zhang et al., 2019; Zhang et al., 2022). Further, fugitive methane emissions are chronically underestimated and difficult to measure (Beugin, 2024). The ER states that the Proponent will monitor and inspect the well and pipeline using vehicles and foot patrols. It	The Proponent should: • Commit to monitoring for fugitive greenhouse gas emissions, which could include monitoring via satellite (e.g., GHGSat); • Describe the frequency and methodology for inspections/leak surveys; • Ensure the monitoring frequency and methodologies include consideration of human health and the environment; • Consider the cumulative effects of fugitive emissions; and • Describe how groundwater quality will be monitored throughout



	also states it will monitor the pipeline remotely and through depth cover surveys, in-line inspections, integrity digs, and leak surveys. However, there is little detail provided as to the nature of these inspections. This is important as leaks “ <i>may result in negative environmental impacts (for example, greenhouse gas emissions and contamination of surface and groundwater)</i> ”. More detail is warranted to help ensure that the health and safety of the environment and CKSPFN members are protected.	construction and operation.
10.0 Inspection and Monitoring Recommendations p. 117	The ER states that Environmental Monitors (typically qualified professionals) will be used as needed during construction (e.g., when handling wildlife).	CKSPFN is interested in participating in construction and post-construction monitoring.

We appreciate the opportunity to comment on the Environmental Report and look forward to ongoing discussions related to this project.

Sincerely,

Jessica Wakefield, Executive Director Major Projects and IBAs, Three Fires Group

Cc:

Chief Kimberly Bressette, Chippewas of Kettle and Stony Point First Nation

Michael George, CEO, Southwind Corporate Development

Verna George, First Nation Manager Chippewas of Kettle and Stony Point First Nation

Vince George, Board President Southwind Corporate Development/Three Fires Group

Line-item attachment 2.30

From: [Chasity Pilecki](#)
To: verna.george@kettlepoint.org; [Consultation](#)
Subject: Waubuno Well Drilling Project: ER Responses to CKSPFN Comments
Date: Wednesday, January 15, 2025 1:00:31 PM
Attachments: [image001.png](#)
[Enbridge responses to CKSPFN Waubuno Well Drilling ER_CLEAN_LW.pdf](#)

Good afternoon,

I hope this finds you well.

Thank you for your patience in the Enbridge Gas responses to the Waubuno Well Drilling Project environmental report comments.

We appreciate Chippewas of Kettle and Stony Point First Nations input.

Once you have had the time to review the response comments, we would be happy to set up a call to discuss them and the project in general.

If you have any questions, please don't hesitate to contact me.

Kindest regards,

Chasity Pilecki (she/her)
Senior Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



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Enbridge Gas Inc. ("Enbridge Gas")
Responses to the Chippewas of Kettle and Stony Point First Nation (CKSPFN) comments
on the 2025 Waubuno Well Drilling Project ("Project") Environmental Report

Enbridge Gas's Responses to CKSPFN Comments received on November 20, 2024			
Item #	Item	CKSPFN comment	Enbridge Gas response
1	Initial Comments	As we continue to develop our relationship with Enbridge, we would like to see more opportunity to identify culturally important wildlife, plants, and medicines and assess potential impacts to rights and interests in the initial stages of the environmental report.	Enbridge Gas looks forward to continuing to engage with TFG, CKSPFN, and other Nations on the proposed Project, including its operations phase, and during future Enbridge Gas projects. If there are specific measures that CKSPFN would like to see initiated, we would be happy to discuss further.
2		Is one site visit and a background review suitable for the identification of Species at Risk? We are looking for a bit more information on the expectations around Species at Risk for this Project, or other Projects this size, and how TFG might be involved in the future.	Preliminary field investigations confirmed that where the Project is to be built consists of annual row crops (soybean in 2024), which would have been harvested in the fall of 2024 and scheduled for replanting of a different row crop in 2025 (following Project completion). The potential for wildlife, including Species at Risk (SAR), was determined to be limited. Land uses surrounding the Project are routinely and heavily disturbed through tillage, planting, cultivating, fertilizing, and harvesting, with limited natural features located in the Project Study Area. With mitigation measures implemented during construction, it is not anticipated that the risk of wildlife entering the Project workspace will result in harm or incidental take. As Enbridge Gas continues to engage with TFG, CKSPFN, and other Nations on this Project and future Enbridge Gas Projects, we would be happy to discuss in greater detail more opportunities for involvement.
3		Cumulative effects are a major concern for CKSPFN. We note that including this consideration in the environmental report is a good first step, but we expect more to be covered within this assessment on future Projects. The spatial boundary should be expanded to	The Ontario Energy Board (OEB) <i>Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition</i> (the Guidelines) provide some direction for the delineation of the Study Area and assessing cumulative effects. The Guidelines require that the applicant consider four distinctive cumulative effect pathways when delineating the Study Area and assessing the cumulative effects, those being:

		include nearby surface water and should consider the upstream and downstream effects of fugitive emissions. At this point, we would like to better understand the requirements of cumulative effects assessment for a Project of this nature and more information on the frequency and methods for monitoring, inspections and leak surveys during Project construction and operation.	• Additive effects of Hydrocarbon Project construction occurring slowly over time (e.g., erosion of the easement due to inadequate grading); • Interactive or magnifying effects from Hydrocarbon Project construction (e.g., soil fertility loss and soil drainage degradation due to compaction during construction); • Additive effects of Hydrocarbon Project construction and other existing and future Projects in the area (e.g., additive forest cover losses due to tree clearing for pipeline construction and subdivision development); • Interaction of Hydrocarbon Project construction with other existing and future Projects in the area (e.g., cold stream fish habitat degradation, as an interactive effect of increased erosion and sedimentation due to pipeline stream crossing and floodplain development downstream). In addition to the OEB guidance, Dillon further considered guidance from federal agencies (i.e., Canadian Impact Assessment Agency, Canada Energy Regulator) when conducting the cumulative effects assessment. The nature of the Project, together with the current environmental setting, establish the extent of interactions between the Project and the environment. Those interactions form the basis on which effects are predicted, and for understanding the appropriate level of detail needed about the setting, interactions, and predicted effects. In accordance with federal impact assessment guidance, the level of effort and scale of the cumulative effects assessment should be appropriate to: • the nature and context of the Project under assessment. • its potential residual effects; and • the environmental and socio-economic setting. Given the scope of the Project and the environmental setting, along with Dillon's professional experience on Projects of similar scope and size, the cumulative effects assessment boundaries were deemed sufficient to assess the Project's contribution to cumulative effects, as described in Section 7.1.2 of the ER.
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			As stated in Section 6.2.2 of the ER, no unmapped or mapped aquatic features exist within the Study Area. Therefore, no potential effects or residual effects of the Project were identified on surface water resources. Two conditions must be met to pursue an assessment of cumulative environmental effects: • There are likely residual Project effects on a specific element as identified through the effects assessment (Section 6 of the ER); and • Residual Project effects could act cumulatively with effects of other past, present, and reasonably foreseeable future Projects or physical activities. Therefore, if there are no likely residual effects of the Project on a valued component, then there is no pathway for interactive or additive effects to be evaluated in the cumulative effects assessment. Assessment of upstream and downstream effects of fugitive emissions is not required under the OEB Guidelines. Please see the response to comment #25 for information regarding the frequency and methods for monitoring, inspections and leak surveys during Project construction and operation.
4		We are interested in reviewing the Environmental Protection Plan and Well Drilling Program to better understand mitigation measures to reduce adverse effects of the Project.	For this project, the Environmental Protection Plan (EPP) will be provided to CKSPFN, and the Well Drilling Application will be published on the OEB website where it will be available for public review.
5	Executive Summary p. xii 6.2.6 Wildlife and Wildlife Habitat p. 76	ISSUE: The ER states that “The Project components are situated in rural agricultural land, previously disturbed by agricultural activities, which greatly	The intention of this statement is to indicate that the location of this Project is situated in agricultural lands which are routinely disturbed for annual row crop production. Due to the ongoing agricultural practices at the Project location, the Project would result in low potential for adverse effects to the greater surrounding environment. With the implementation of best

		reduces the potential for adverse effects to the natural environment”. Agricultural land provides habitat for a host of species that are adapted to an agricultural landscape, including SAR (e.g., barn swallow, grassland birds) and culturally important wildlife (e.g., bald eagle, white-tailed deer), some of which were observed within the study area. Further, gravel road shoulders can provide habitat to ground-nesting birds, basking areas for reptiles, and nesting habitat for turtles. Suggesting that industrial development has a greatly reduced impact merely because it is sited in an agricultural landscape is misleading and minimizes potential impacts of the proposed Project. COMMENT: The Proponent should acknowledge the importance of agricultural landscapes for wildlife and wildlife habitat in highly fragmented and disturbed areas in the Township of St. Clair by removing these statements from the ER.	management practices and appropriate mitigation measures, impacts to local wildlife that may use the area as transient habitat are not anticipated.
5	2.1.1 Identification of Study Area and Environmental Inventory p. 9	ISSUE: A 125 m buffer around all Project components was used to define the boundaries of the study area. According to the ER, this area was “determined to be most likely to be directly or indirectly affected by the Project”. No further	Dillon selected a 125 m buffer for the desktop Study Area boundary as this is a generally accepted Study Area used by Dillon in past Projects of similar nature and is based on Dillon’s professional experience on Projects of similar size and scope. The 125 m buffer includes the Project Footprint, encompassing the Project components as well as the temporary workspaces that will be required for Project construction. Text pertaining to this

		detail was provided as to how this determination was made. Without more detailed rationale, CKSPFN cannot be assured that all potential Project impacts were captured in the effects assessment. COMMENT: The Proponent should provide additional rationale (e.g., based on best available literature, Indigenous Knowledge, case studies) that a 125 m buffer around all Project components is inclusive of all areas likely to be directly or indirectly affected by the proposed Project.	additional rationale has been added to Section 2.1.1 of the ER where details on the Study Area are discussed.
6	2.1.2.5 Potential Project Interactions Table 2-3 p.19	ISSUE: Table 2.3 lists potential Project interactions with the physical, natural, and socio-economic environment. The Proponent has not identified potential Project interactions with the following: - Groundwater during operations. - Vegetation during construction; and - Wildlife and wildlife habitat during construction. It is unclear why these Project interactions were not included in Table 2-3. For example, the ER states that "Wildlife habitat has been preliminarily identified within the Study Area through the initial field assessment and ELC	Groundwater during operations Table 2-3 of the ER has been corrected to indicate that there is a potential for Project operation to interact with groundwater. Thank you for identifying this discrepancy between Table 2-3 and Dillon's conclusions in Section 8.1.2 where potential impacts are identified. Vegetation, wildlife and wildlife habitat during construction There are no plans to remove trees from the hedgerow as part of this Project. Select pruning may be required to support safe passage of vehicles along the existing laneways that parallel the hedgerow (to be completed outside of the wildlife active period of April 1 to September 30). Vegetation removal will be limited to the roadside shoulder located at the edge of the agricultural field (which at the time of the preliminary site investigation was dominated with grass species). As the Project is primarily located in the active agricultural field and existing gravel laneways, vegetation disturbance is considered minor.

		mapping". Any vegetation removals during construction will interact with vegetation (e.g., trees) and potentially wildlife and wildlife habitat (e.g., grassland birds, bats). Furthermore, during operations, "loss of integrity, accidents, and production interruptions increases and may result in environmental impacts (for example, greenhouse gas emissions and contamination of surface and groundwater"). COMMENT: The Proponent should update the ER to reflect potential Project interactions with groundwater during operations, and vegetation, wildlife and wildlife habitat during construction.	The potential for wildlife encounters are expected to be minimal, as supporting habitat features that are essential for local wildlife to carry out their life-cycle (such as breeding, foraging, overwintering) was not identified. Table 2-3 of the ER has been updated to indicate that there is a potential for the Project to interact with vegetation and wildlife during construction. Section 6.2.5 of the ER has been updated with further details and specific mitigations on pruning activities. References to tree removals have been removed from the ER.
7	4.2.2 Aquatic Environment p. 42 4.2.5.1 Ecological Land Classification p. 44 Appendix K Table K-1 p. K-1	ISSUE: The ER regularly refers to the "preliminary field investigation completed on June 18, 2024". At this site visit, the following was completed: - Verification of watercourse, wetland, and woodland features; - Ecological Land Classification. - Vegetation Inventory; and - Record of incidental wildlife. Considering the results of this site visit (e.g., observations of SAR and culturally important wildlife) and the background	Preliminary field investigations generally consist of base field surveys such as Ecological Land Classification (ELC) and aquatic surveys to identify the potential habitat features that may be present and to determine if more detailed studies may be required. As the Project is located in an annual row crop under active agricultural practices (soybean in 2024), further detailed studies were not required as the habitat criteria to warrant such studies within the 30 m setback from the Project was not observed.

		review, it appears that more detailed information of the site conditions is warranted. For example, during the preliminary field investigation many plants were only identified to genus. Without more detailed information about the environmental features, wildlife, and wildlife habitat present on site (e.g., across seasons), CKSPFN cannot be assured that the effects assessment and proposed mitigation measures are sufficient to protect CKSPFN Treaty and Aboriginal rights. COMMENT: The Proponent should provide information as to why the following were not completed as part of the assessment of the study area: - Breeding Bird Surveys; - Amphibian calling surveys; - Cavity assessment/bat maternity roost surveys; - Multi-season vegetation inventory; and - Headwater drainage features assessment (to identify ephemeral wetlands/watercourses).	
8	4.2.5.1 Ecological land Classification p. 43	ISSUE: A treed hedgerow was identified during the preliminary field investigation along the existing gravel access road. Also, a cultural thicket/meadow is located to	Tree removal will not be required for the Project. Project activities will require select pruning within the hedgerow that parallels existing laneways to allow for the safe movement of vehicles during construction. Pruning will be completed outside of the SAR Bat sensitive timing window and migratory bird nesting period but if pruning is required during these windows, nest surveys

		the north of the proposed natural gas storage well, which appears to be connected to the riparian areas of Bear Creek. It is unclear from the ER whether the vegetation in these ELC communities will be removed or retained during Project works. This is important to note in the ER to accurately determine potential impacts to vegetation and wildlife. Hedgerows and cultural thicket/meadow can provide important habitat for SAR (e.g., eastern foxsnake, bats, Prothonotary warbler) and culturally important wildlife (e.g., white-tailed deer). Furthermore, landscape features that convey ecological connectivity to relatively undisturbed areas (e.g., Bear Creek) are very important to protect in an area that is highly fragmented. COMMENT: The Proponent should: - Provide an opportunity for CKPSFN monitors to complete an ecological assessment/site visit; - Describe in the ER the extent of removal/disturbance required to complete the proposed Project;	would be required, and the following additional survey and mitigation considerations will be made. If active and protected nests are observed, pruning activities would be delayed until active nests were no longer present. The specific measures for nest surveys are outlined in the ER: • Abide by regulatory timing windows for migratory birds (generally April 1 to August 31) and setback distances when vegetation removal is required or when working in or directly adjacent to natural features. • Conduct pre-construction nest sweeps if construction will occur within the migratory bird restricted activity period (April 1 to August 31). Nest sweeps are valid for up to 7 days; however, it is recommended to clear vegetation within 48 hours of a migratory bird nest sweep. • Protect active nests by flagging or fencing off an appropriate setback distance as determined by a qualified professional. • If a nest is found during construction activities, stop work, and notify the site inspector and Project Environmental Advisor. If tree pruning is proposed during the bat active window (April 1 to September 30), a qualified biologist will assess the branches proposed for pruning to determine if impacts to bat habitat may occur. Additional mitigation and/or considerations will be employed if the branches proposed for pruning may support suitable bat roosting habitat. Vegetation clearing (e.g., mowing, grubbing) will be minor as the Project is primarily located within an active agricultural row crop field and existing gravel laneways. Vegetation clearing will be limited to the shoulder of the existing laneway and the agricultural field. No change to vegetation composition is anticipated due to Project activities. Enbridge Gas plans to offer site visits for Indigenous communities who participated in the consultation portion of the Project's environmental study, including CKSPFN.
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		- Retain a certified arborist to complete a tree inventory; and - Develop a Tree Protection and Preservation Plan.	
9	4.2.6.1 Fauna pp. 46-47	ISSUE: For each wildlife grouping (e.g., birds, mammals, herptiles, etc.) the proponent indicates the number of SAR and Species of Conservation Concern (SCC) that have potential to occur in the vicinity of the study area. However, the Proponent incorrectly excludes species listed as Special Concern under the Endangered Species Act as “provincially listed SAR”. Special Concern species are considered SAR under provincial legislation, although they do not receive automatic protection under the Endangered Species Act. COMMENT: The Proponent should update the ER to reflect that species listed as Special Concern under the Endangered Species Act are provincially listed SAR.	Additional language has been added to the ER under 4.2.7 to distinguish that when SAR is referenced, it is referring to those species with the designations of Threatened or Endangered that are afforded species and habitat protection under the Endangered Species Act (ESA). In order to provide clear distinction on applicability of respective provincial legislation, species with a provincial status of Special Concern are addressed and considered further under discussions of Significant Wildlife Habitat as Species of Conservation Concern (SCC). It is acknowledged that species designated as Special Concern under the ESA, 2007 are listed on the Species at Risk in Ontario (SARO) List in Section 4.2.6.3. <i>“The SWH Technical Guide (MNR 2000) defines SCC as globally, nationally, provincially, regionally, or locally rare (SRank of S1, S2 or S3) but does not include SAR with provincial protection (species listed as Threatened or Endangered [...]).”</i>
10	4.2.6.2 Incidental Wildlife Observations p. 47	ISSUE: During the June 2024 preliminary field investigation, data on incidental wildlife was collected. As part of this investigation, barn swallow (Special Concern) and bald eagle (listed as Special Concern at the time of site visit) were observed. However, there is no information provided in the ER about	Typical of avian incidental observations in this area of Ontario, Bald Eagle and Barn Swallow were observed as fly-overs; therefore, it would be difficult to accurately represent the location of these observations on a figure. No Bald Eagle nests, Barn Swallow nests, or designated habitat were observed in the Study Area. The statement is accurate in that it outlines that Barn Swallow and Bald Eagle are provincially listed as Special Concern under the SARO list (O. Reg. 230/08).

		the location of these observations, the number of individuals observed, or the animals' behaviour. The ER states that "with the exception of Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>)... no SAR [Species at Risk] or SCC [Species of Conservation Concern] were observed in the study area". This statement is misleading and undermines the importance of SAR observations within the study area (e.g., barn swallow). COMMENT: The Proponent should provide a figure in the ER displaying the location of incidental wildlife observations of SAR and culturally important wildlife. This should also include indication of the number of individuals observed and their behaviour. The Proponent should also remove the statement "with the exception of Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>)... no SAR or SCC were observed in the study area" from the ER. It should be replaced with a more accurate statement. For example, "Barn Swallow (<i>Hirundo rustica</i>) and Bald Eagle (<i>Haliaeetus leucocephalus</i>), which are listed as	Section 4.2.6.2 was updated to clarify that Barn Swallow and Bald Eagle were observed as fly-overs and that suitable habitat was not observed for these species within the Study Area.
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		savannah sparrow are present in background review. - Special Concern and Rare Wildlife Species: 12 identified during background review. This information is important to provide assurance to CKPSFN that wildlife habitat, including culturally important wildlife habitat, is appropriately identified and protected as Significant Wildlife Habitat, where applicable. COMMENT: The Proponent should provide additional information in the ER regarding the identification of SWH within the study area. This could be achieved by providing an SWH screening table. The final ER should be provided to CKSPFN for review and comment.	
12	4.2.7.2 Potential for Species at Risk in the Study Area p. 50	ISSUE: The ER identified 18 provincially-listed SAR with known occurrences in the vicinity of the study area. However, “it was determined that the Study Area does not have the potential to support SAR or their habitat”. It is unclear how the Proponent has made this determination. The Proponent has not provided sufficient rationale (e.g., a SAR screening table) to provide CKSPFN with assurance that SAR and SAR habitat has	During Dillon’s desktop assessment (background data review and review of aerial imagery), a number of background data sources were reviewed which document species incidentals, range, habitat, behavior and movement patterns, timing windows, land uses, and sensitive features. Refer to the reference list in Section 12 of the ER for the full list of online resources that were used during the desktop assessment. The results of the desktop assessment were then compared with the existing conditions of the Study Area, which were documented during the preliminary field investigation. Understanding the SAR with known occurrences in the general area of the Project, and in consideration of their required habitat(s) essential for these species to successfully carry out their life cycle, an assessment of potential SAR and SAR habitat to overlap with the Project was completed.

	been appropriately identified. For example: - Barn swallow (Special Concern) was observed during the site visit and requires open habitats (including agricultural crops) for foraging habitat. Breeding Bird Surveys do not appear to have been completed to confirm breeding status. - Eastern foxsnake (Endangered) can use hedgerow habitat. The survey protocol for SAR snakes in Ontario does not appear to have been completed. - Eastern Meadowlark (Threatened) can nest in row crop fields such as corn and soybean (COSEWIC, 2011). The Survey Protocol for Eastern Meadowlark in Ontario does not appear to have been completed. The Proponent also does not appear to have completed targeted SAR surveys at the appropriate times of year (e.g., Survey protocol for Ontario's species at risk snakes; Breeding Bird Surveys for bobolink and eastern meadowlark; Survey Protocol for Eastern Meadowlark in Ontario). COMMENT:	Further site investigations and/or surveys are typically warranted when potential SAR/SAR habitats are observed and/or when Project work is anticipated to overlap with sensitive timing windows. To speak to the examples provided: - <u>Birds</u>: As clarified in the updated section 4.2.6.2 of the ER, the Study Area does not provide suitable habitat for Barn Swallow and no evidence of nesting for this species was observed during the preliminary field investigation. As per the Barn swallow: Species at Risk Recovery (MECP 2020), Barn swallows typically nest in human-made structures (e.g. barns) and no evidence of these structures were observed within the 125-m Study Area boundary. As a precautionary mitigation, general mitigation measures have been outlined in the ER to minimize the potential impact to migratory birds. Contractors are to abide to regulatory timing windows (April 1 to August 31) and setback distances when vegetation removal is required. Contractors will conduct pre-construction nest sweeps if construction is to occur within the migratory bird restricted activity period (April 1 to August 31). With these and other proposed mitigation measures employed, impacts to SAR birds or migratory breeding birds are not anticipated. - Additional investigations for Eastern Meadowlark are not warranted as the site is not located within suitable habitat. Typical habitat requirements of Eastern Meadowlark include: open, grassy meadows, farmland, pastures, hayfields, or grasslands with elevated singing perches; cultivated land and weedy areas with trees; old orchards with adjacent, open grassy areas >10 ha in size (MECP 2021). The site is located in an active row crop that will be replanted with another row crop in 2025 following Project completion. Row crop is not considered suitable habitat. - <u>Snakes</u>: Eastern Foxsnake in the Carolinian population are usually found in old fields, marshes, along hedgerows, drainage canals and shorelines (MECP 2021). Butler's Garter snake prefer open, moist habitats, such as dense grasslands and old fields with small wetlands (MECP, 2021). As provided in Section 4.2.7.2 of the ER, the Project is
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		The Proponent should: - Provide additional information in the final ER regarding the identification of SAR and SAR habitat within the study area. This could be achieved by providing an SAR screening table. - Complete targeted SAR surveys for species with a moderate to high probability of being present within the study area; and - Provide the final ER to CKSPFN for review and comment	located in the documented range for two SAR (Butler's Garter snake and Eastern Foxsnake). Although direct habitat features for these SAR were not observed in the Study Area, these two SAR have the potential to be encountered during Project activities if moving across the landscape (agricultural lands) between natural features (watercourse, thickets, meadows, forests) that have the potential to provide direct habitat. Section 6.2.7 of the ER outlines mitigation measures for SAR snakes and with the employment of these mitigations, no impacts to these species are anticipated. Encroachment or alteration of potential snake habitat is not anticipated as a result of Project activities. For more details on SAR, please refer to Section 4.2.6.2 of the ER and its associated appendices.
13	4.2.7.2 Potential for Species at Risk in the Study Area p. 51	ISSUE: It is unclear why grassland bird habitat is only identified to the east of the road within the study area, and not the entire OAGM1 ecosite. From aerial imagery, this area appears contiguous. It is important that all areas that could provide habitat for SAR grassland birds are accounted for. For example, Eastern Meadowlark (provincially Threatened) is known to nest in row crop fields such as corn and soybean (COSEWIC, 2011). COMMENT: The Proponent should provide clarity on why only the portion of the OAGM1 ecosite east of the road is potential habitat for SAR grassland birds. Otherwise, the western portion should	The field to the east of the existing road was planted with winter wheat at the time of preliminary field investigation. Winter wheat is generally considered to be a more preferred grassland habitat than other row crops and as such, was included as potential habitat for SAR grassland birds, despite potential for this species being low. In the COSEWIC report for Eastern Meadowlark, it is noted that "Eastern Meadowlark occasionally nest in row crop fields such as corn and soybean, but these crops are considered low-quality habitat (Cadman et al. 2007)". As clarified in the responses above, at the time of the preliminary field investigation, the site was documented to be within active row crop and as confirmed by the existing landowner, the site will be returned to active row crop (corn) in 2025 following Project completion. This field (i.e., the field to the west of the road) was not considered to have potential habitat for SAR grassland birds. At the time of Project construction, the active agricultural field will be cleared, and, coupled with the employment of recommended mitigation measures, no impacts to SAR birds are anticipated.

		also be included in mapping of potential SAR habitat.	
14	5.0 Site Selection Process p. 62	ISSUE: No site selection constraints analysis or alternatives assessment was conducted for the proposed Project. The Proponent states this is because there was a necessity to locate the well within ideal geology in the Designated Storage Area. However, no mapping is provided in the ER to show the areas within the Designated Storage Area with ideal geologic conditions for subsurface storage of natural gas. Further, there should be an assessment of alternatives that includes a “do nothing” option. COMMENT: The Proponent should: - Provide mapping of areas with ideal geology within the Designated Storage Area; and - Complete an assessment of alternatives to the proposed location, including a “do nothing” alternative.	As stated in Section 5 of the ER, Enbridge Gas identified the site for the Project based on the boundary of the Waubuno DSA and its ideal geologic conditions for the subsurface storage of natural gas. Given the necessity to locate the well within the DSA with ideal geology, no site selection constraints analysis was conducted for the Project and no alternatives were assessed. Should CKSPFN wish to have additional information, Enbridge Gas proposes a meeting to go over the geological conditions in the DSA and why the location was chosen.
15	6.1.1 Surficial Geology and Soil	ISSUE: The Proponent proposed a series of mitigation measures to address impacts of surficial geology, soil, and the atmosphere. However, there are important details that are not included in the ER. These are:	Erosion and Sediment Controls (ESC): ● ESC will be monitored regularly by the On-Site Supervisor or designate to confirm they are functioning properly. Additional inspections will be conducted after every 10 mm or greater rainfall and after significant wind events. Dust Suppressant:

		- The frequency that Erosion and Sediment Control (ESC) measures will be monitored; - The type of dust suppressant that will be used (e.g., water or another chemical); - Requirements for machinery to arrive on site in clean condition following clean equipment protocols (e.g., Halloran et al., 2016). - Plans for the revegetation and remediation of the construction work area and after Project decommissioning. COMMENT: CKSPFN is interested in learning more about the following: - Indicate the frequency that ESC measures will be monitored; - Indicate the type of dust suppressant that will be used; - Ensure equipment arrives on site in clean condition and according to standard protocols; and - Provide more details in the ER regarding revegetation and remediation plans for the site.	• Water will be the preferred dust suppressant used for the Project. Any suppressant used will be environmentally friendly and approved for use on agricultural soils. Equipment: • Table 6-1 of the ER identifies mitigation stating “Machinery should arrive on site in a clean condition” • The Project-specific EPP will include standard mitigation measures outlining that equipment and vehicles must arrive to the site clean and free of dirt and debris to reduce the potential for the introduction of invasive species and Soybean cyst nematode infection. Vehicles and equipment will also be clean and free of dirt and debris prior to leaving the site. Clean equipment protocols will be followed. Remediation: • The construction areas will be restored to as close to pre-construction conditions as possible. • Lands supporting vegetation disturbed by construction are to be seeded with an appropriate seed mixture and in accordance with the landowner’s preference. If the landowner gives no preference for revegetation (outside agricultural fields), appropriate Ontario native seed mixes that are free of weed species are recommended. • Enbridge Gas will consult with the landowner regarding their preference for revegetation within the agricultural field. • While no tree or hedgerow removal is anticipated, in the event that such removal is required, replant ornamental trees or hedgerows with the same or similar species, where appropriate or, as per landowner requests.
16	6.1.4 Groundwater p. 69	ISSUE: According to the ER, dewatering may be required to facilitate construction. The Proponent describes mitigation	During construction, significant discharge of excess water is not anticipated, should it be required it will be discharged at a location and in a manner to prevent erosion and following all applicable guidelines and regulations. The

		measures to protect groundwater; however, there are additional details that should be described to help provide assurance to CKPSFN that groundwater quality and quantity will be protected. These include: - Where excess water will be discharged during dewatering; - The rate and amount of water that will be removed; - How groundwater quality will be monitored throughout the construction and operations phases; and - How the Water Well Monitoring Program survey radius of 1 km was determined. Further, the Proponent should require that vehicles and machinery are refueled >30 m away from surface water bodies and natural areas. COMMENT: Proponent should update the ER to: - Require refueling away from surface water bodies and natural areas; - Describe where excess water will be discharged to during dewatering; - Describe the rate and amount of water that will be removed;	rates and volumes of potential dewatering discharge is not known or accurately estimated. Daily water taking volumes will be recorded. Should dewatering exceed 50,000L/day, an EASR (or PTTW if exceeding 400,000L/day) will be obtained and conditions of the permit met. Excess water will be discharged in the agricultural field within a well vegetated location, if a well-vegetated location is not available (or feasible to access), the discharge bag will be placed on top of a rock pad overlain with geotextile fabric and a sediment control barrier. Excess water will be discharged at a minimum of 30 m away from wetlands, watercourses, and/or waterbodies. The excess water will be discharged on a flow path that does not lead directly to a wetland, waterbody or watercourse. There are no surface waterbodies within the Study Area. All refueling will be completed a minimum of 50 m away from waterbodies (i.e., wetlands). A 1 km notification radius for the Well Monitoring Program was selected based on a review of O. Reg. 245/97: Exploration, Drilling and Production. O.Reg. 245/97 does not specify the distance for development wells (which is the category of well the Project falls under); however, specifics are provided for similar storage projects. Section 2.7(1)7 of O. Reg. 245/97 states that, <i>"after an application for a license of permit with respect to a well that is part of a Compressed Air Energy Storage (CAES) project in a porous rock reservoirs is completed [...], the applicant shall give written notice of the application to the following persons and entities: 7. any person who owns land on which a water well, geothermal well, or a well as defined under the Act is situated if that well is located within the proposed surface area of the CAES Project or within one kilometre of the proposed surface area."</i> The 1-kilometre notification radius has been regarded as a best practice for this Project as the Project is of a similar scope to that of a CAES Project and similar geological conditions are present to that described in Section 2.7.(1)7. Section 10.1 of the ER has been updated with text providing this rationale regarding the 1-kilometre radius.
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		- Describe how the Water Well Monitoring Program survey radius of 1 km was determined; and - Describe how groundwater quality will be monitored throughout the operations phase.	During Project construction, groundwater quantity and quality will be monitored through the Water Well Monitoring Program. No groundwater monitoring programs are required for the operations phase. The well will be continuously monitored for any integrity issues that may lead to accidents or incidents resulting in impacts to groundwater.
17	4.2.2 Aquatic Environment p. 42 6.2.2 Aquatic Environment p. 73	ISSUE: While it is understood that there were no mapped or unmapped aquatic features identified within the study area, Bear Creek is approximately 275 m from the north and east of the proposed well. Bear Creek has potential to support multiple aquatic SAR and is mapped as critical habitat for two SAR mussels. Mussels can be very sensitive to changes in water quality; thus, it is very important that surface and groundwater flows and water quality are maintained to Bear Creek throughout the Project. Although it is outside of the study area, it may be advisable to conduct water quality monitoring of Bear Creek in proximity to the proposed Project. COMMENT: The Proponent should: - Describe how surface and groundwater flows to Bear Creek will be maintained	As provided in Section 4.1.1 of the ER, topography in the Study Area is generally flat, and ranges from 186 metres above sea level (masl) to 190 masl, decreasing in elevation to the west, nearing Bear Creek. Based on the topographic conditions described in Section 4.1.1 and review of aerial imagery, the Study Area drains southwest across active agricultural row crop lands (this detail has been added to Section 4.2.2). Bear Creek is located approximately 245 m west of the Study Area and no impacts to this feature are anticipated with the employment of recommended erosion and sediment control (ESC) measures. Water quality monitoring of Bear Creek is not warranted. According to aerial imagery from 2014 and 2024, an agricultural drainage swale is located within the footprint of the proposed access road and another swale is located approximately 20 m west of the temporary pad. These would both be considered headwater drainage features, if such an assessment was done. Drainage swales are commonly found in agricultural fields. Any swales within or adjacent to the temporary pad will be protected during construction by ESC measures installed around the temporary pad site, i.e., silt fencing. To limit impacts to these headwater features (and other surface water features adjacent to the Study Area), the following mitigations have been added to Table 6-2, Section 6.1.2: ● Control surface drainage on the construction site, if warranted, to prevent surface water from entering areas of disturbed and erodible soils. It is recommended that dual-purpose sediment and erosion

		throughout the construction phase of the Project; - Complete a Headwater Drainage Features Assessment to identify whether the study area contains temporary small streams, swales, and/or wetland features that capture water and transport it to Bear Creek; and - Consider conducting water quality monitoring of Bear Creek in proximity to the proposed Project.	control and wildlife exclusionary fencing be applied around the perimeter of the temporary pad: - o ESC measures will be implemented prior to and maintained during the construction phases and as required post construction to mitigate entry of sediment into adjacent sensitive natural features (i.e., watercourses, wetlands, etc.,). - o ESC measures should be installed as per manufacturer's specifications.
18	6.2.5 Vegetation Table 6-6 p. 74	ISSUE: It is unclear from the ER if tree removals or removal of the hedgerow will be required to complete construction. If trees must be removed, there are additional mitigation measures that should be included in the ER to protect vegetation, wildlife, and wildlife habitat. COMMENT: If trees must be removed, the Proponent should commit to: - Developing a Tree Inventory and Preservation Plan by a certified arborist; - Installing tree protection zone fencing prior to vegetation removal to protect trees from injury to limbs and soil compaction;	Project activities will not require the removal of trees from the hedgerow, though select pruning may be required to support passage of vehicles along the existing laneways that parallel the hedgerow. The Project EPP will contain mitigation measures to protect trees within the Project Footprint, examples of a standard mitigation measure that will be included in the EPP are below: • Where feasible, construction traffic should be limited to the existing gravel laneways and the permanent access road to avoid potential compression to tree root zones. Section 6.2.5 of the ER has been updated with further details and specific mitigations on pruning activities. References to tree removals have been removed from the ER.

		- Not storing material or machinery within the tree protection zone; and - Avoiding tree removals during the breeding bird timing window (generally April 1 to August 31) and the bat active season (April 1 to September 30).	
19	6.2.5 Vegetation Table 6-6 p. 74 6.2.6 Wildlife and Wildlife Habitat p. 78	ISSUE: According to the ER, upon completion of construction all vegetation removed or damaged should be replaced with native species appropriate for the habitat type and existing land use. It also states that the Proponent will implement measures to restore lost habitat/habitat connections. COMMENT: CKSPFN is interested in reviewing and providing comment on the proposed planting/ habitat restoration plans after construction, and the reclamation plans post-operation. This will help ensure that the native vegetation planted will support culturally important wildlife and its habitat.	No Restoration Plan will be prepared for the Project as the temporary pad will be returned to active agricultural lands. Enbridge Gas will consult with the landowner regarding their preference for revegetation within the agricultural field. Where vegetation clearing (e.g., mowing and grubbing) occurs in the shoulder of the existing laneway, an Ontario native seed mix appropriate to the area will be used.
20	6.2.6 Wildlife and Wildlife Habitat p. 79	ISSUE: The study area has potential to support many species of reptiles, including the at-risk eastern foxsnake and Butler's garter snake. Therefore, it is very important that the Proponent takes	To mitigate potential interactions with herptiles, dual purpose sediment and wildlife exclusion fencing has been proposed around all perimeters of the temporary pad (for details on the recommended silt fence, refer to the response to question #17). Additional mitigation measures for dual-purpose sediment and wildlife exclusion fencing have been added to section 6.1.2 of the ER. When installing silt fence, as outlined in Table 6-7, Section 6.2.6 of the

		every reasonable step to protect reptiles and their habitat from potential impacts. COMMENT: The Proponent should: - Complete targeted surveys for snake Species at Risk (e.g., OMNRF, 2016). - Include the following mitigations in the ER: - o A circle check or visual inspection of machinery and equipment should be completed each morning, and after any extended period of non-use. - o Follow posted speed limits. - Where possible, fence off the construction area to exclude reptiles and amphibians who may use the area for basking, breeding, and/or nesting.	ER, the timing windows for the nesting and breeding season of herptiles will be considered and identified habitat features will be flagged or fenced. The recommended depth of the fence and height of the fence will be determined based on the Project recommendations for exclusion fencing according to the MNR (2013) document Species at Risk Best Practices Technical Note, Reptile and Amphibian Exclusion Fencing (Version 1.1). As provided in Section 6.2.6, the Contractor will visually inspect machinery and/or engine compartments each day during construction for basking reptiles such as snakes. Enbridge Contractors will follow posted speed limits, and as per Section 7.4.4.3. risk of wildlife mortality will be mitigated by limiting vehicle speeds in Project construction zones. For additional mitigations specific to herptiles, refer to Table 6-7, Section 6.2.6 of the ER. At this time, no further surveys are warranted.
21	4.1.2.2 Agricultural Tile Drains p. 32 6.2.6 Wildlife and Wildlife Habitat p. 79	ISSUE: There is no effects assessment nor mitigation measures proposed in the ER in relation to amphibians. Three amphibian species were observed during the incidental site visit, though it is unclear where in the study area they were observed. The ER states that approximately 100% of the study area	The active agricultural field where the Project occurs experiences consistent and ongoing agricultural practices. No suitable habitat areas were identified within the Project Footprint that could potentially support breeding amphibians. The amphibians observed were moving through the agricultural field. It was noted that some wet areas were identified in adjacent meadow habitat to the northwest; this area is within the 125 m Study Area boundary but outside the Project Footprint.

		contains random agricultural tile drainage, and that unlike systematic drainage, a random drainage system is “used to drain isolated wet spots caused by springs or ponding”. Isolated wet spots may be used by amphibians as breeding habitat. It is unclear from the ER whether wet spots or ponding are present in the study area. COMMENT: The Proponent should: - Describe the location, number of individuals, and behaviour of amphibians observed on site during the preliminary investigation; - Complete amphibian calling surveys to better understand potential impacts to amphibians; and - Develop mitigation measures to protect amphibians.	As potential amphibian habitat was not observed in the Project Footprint, more detailed surveys are not warranted. Amphibians such as the frogs and toads observed are known to move beyond their main habitat for life processes and can be observed in meadow and row crop fields but would not rely on these habitats to carry out life-processes such as breeding, over-wintering and/or egg-laying. Mitigation measures to protect amphibians are provided in Table 6-7, Section 6.2.6 of the ER under the header ‘Herptile’.
22	7.1.1 Spatial and Temporal Boundaries	ISSUE: The ER states that “Based on Dillon’s professional experience, it was determined that the spatial boundaries for the cumulative effects assessment be established as a 1- kilometre buffer around the Project”. It further notes that “no reasonably foreseeable activities or development were identified within the spatial boundaries (i.e., 1-kilometre buffer) of the	Dillon considered guidance from federal agencies (i.e., Canadian Impact Assessment Agency, Canada Energy Regulator) when conducting the cumulative effects assessment including, but not limited to, the following resources: • Technical Guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 (CEA Agency 2018) • The Cumulative Effects Assessment Practitioners Guide (Hegmann et al. 1999) • Strategic Assessment of Climate Change (ECCC 2020)

	cumulative effects assessment". "Professional experience" is not sufficient to justify why a 1 km buffer was selected for the cumulative effects assessment. There should be literature, Indigenous Knowledge, and/or case studies to support this determination. There is existing guidance available to determine the spatial boundaries for a cumulative effects assessment (e.g., IAAC, 2023). Valued component centered spatial boundaries are generally recommended, as it allows for the most meaningful spatial boundaries to be drawn for the cumulative effects assessment. COMMENT: The Proponent should provide strong rationale to support the applied 1 km buffer around the proposed Project for the cumulative effects assessment. Otherwise, the final ER should include an updated cumulative effects assessment that incorporates a valued component centered spatial boundary. For example, greenhouse gas emissions (e.g., methane) and human health should be assessed at a regional scale or larger, while wildlife valued components should be assessed at a scale that is inclusive of species home range (e.g., 1500 m for eastern foxsnake, ECCC, 2020) and dispersal distance.	These documents were considered relevant to the Project because they represent the current guidance from regulatory agencies and methods commonly used by EA practitioners. The nature of the Project, together with the current environmental setting, establish the extent of interactions between the Project and the environment. Those interactions form the basis on which effects are predicted, and for understanding the appropriate level of detail needed about the setting, interactions, and predicted effects. In accordance with federal impact assessment guidance, the level of effort and scale of the cumulative effects assessment should be appropriate to: • the nature and context of the Project under assessment; • its potential residual effects; and • the environmental and socio-economic setting. Given the scope of the Project and the environmental setting (disturbed land and rights-of-way), along with Dillon's professional experience on Projects of similar scope and size, the cumulative effects assessment boundaries were deemed sufficient to assess the Project's contribution to cumulative effects, as described in Section 7.1.2 of the ER. GHG emissions are generally not subject to cumulative effects assessment, rather, the latest federal EA guidance requires a strategic assessment of climate change. The scope and scale of the Project does not justify a strategic assessment of climate change, nor is it required by the OEB Guidelines.
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23	7.4.3 Loss of Altercation of Vegetation p. 101	ISSUE: The ER states that “No locally or regionally adopted threshold or standard exists against which an incremental change in vegetation composition can be judged. However, given that the proposed works will occur in rural residential and active agricultural land, the amount of loss and alteration of vegetation within the Study Area is considered low in magnitude and will have a negligible contribution to the cumulative change to vegetation composition in this setting”. It is unclear in the ER how much vegetation (e.g., surface area in hectares, % of each ELC community) will need to be removed to accommodate the proposed works. Even removal of a small number of trees can have a large impact in an area that is already highly fragmented. Without prior knowledge of the amount of vegetation removal required to achieve the proposed Project and plans for reclamation, it cannot be concluded that vegetation removal will be not significant. COMMENT: The Proponent should quantify and describe the amount of vegetation that will be removed to accommodate the	Project activities will not require tree removals. Select pruning will occur within the hedgerow that parallels existing laneways to allow for the safe movement of vehicles during construction. To mitigate potential impacts to SAR bats and nesting migratory birds, pruning activities will occur before April 1 (outside of the sensitive timing window; April 1 - September 30). Vegetation disturbance will be limited to the road shoulder of the existing laneway. No permanent change to vegetation composition is anticipated due to Project activities. The loss or alteration of existing vegetation will be temporary and reversible. Section 6.2.5 of the ER has been updated with further details and specific mitigations on pruning activities. References to tree removals have been removed from the ER.
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		proposed Project. Once this information is known, the Proponent should redetermine the significance of loss and alternation of vegetation from the proposed Project.	
24	7.4.4.1 Wildlife Habitat P. 102	ISSUE: Since activities will be conducted within the previously disturbed agricultural lands, the ER states that “no new habitat fragmentation or removal is anticipated”. However, it is unclear from the ER the extent of tree/vegetation removal that will be required to complete the Project activities. For example, removal of the hedgerow could remove habitat for SAR bats, birds, and reptiles. The ER also concludes that “the extent and frequency of disturbance in agricultural and residential landscapes, such as the Study Area, have exceeded levels at which the ecosystems are capable of supporting some wildlife populations with natural biodiversity and abundance”. Without clear plans in the ER to survey for SAR and SAR habitat within the study area, and no mitigation measures specifically for culturally important wildlife, CKSPFN cannot be assured that the Project’s contribution to cumulative effects will not be significant. COMMENT:	Project activities will not require tree removals. Select pruning will occur within the hedgerow that parallels existing laneways to allow for the safe movement of vehicles during construction. To mitigate potential impacts to SAR bats and nesting migratory birds, pruning activities will occur before April 1 (outside of the sensitive timing window; April 1 - September 30). Vegetation disturbance will be limited to the road shoulder of the existing laneway. No permanent change to vegetation composition is anticipated due to Project activities. Clearing will be completed outside sensitive timing windows and additional mitigation measures will be implemented to limit impacts to wildlife, as outlined in Section 6.2.6 of the ER. The assessment of potential effects and assessment of cumulative effects in the ER effectively capture and identify potential impacts to existing conditions. As provided in our response to question #12, no further assessments are warranted for SAR and SAR habitat. Mitigation included in the ER is sufficient to mitigate anticipated impacts to vegetation, SAR and SAR Habitat.

		The Proponent should reconsider the conclusions of its cumulative effects assessment once sufficient surveys have been completed to identify wildlife and wildlife habitat within the study area.	
25	7.4.2 Increase in Air Emissions p. 100 7.4.3 Loss or Alteration of Vegetation p. 101 8.1 Accidents and Malfunctions Considered p. 106 Effects Assessment and Significance p. 110	ISSUE: The ER states that “Failure to isolate sources of hydrocarbon early in the well-construction process or operations may result in abnormally pressurized casing strings and leaks of gas into zones that would otherwise not be gas bearing. Migration of substantial amounts of natural gas can seep into private water wells and/or shallow aquifers...”. The ER does not adequately describe the risks associated with potential leaks. For example, fugitive emissions can have far-reaching human and environmental impacts. Fugitive gas (typically methane or volatile organic compounds) released by leaky infrastructure can be a significant source of greenhouse gas emissions. Some fugitive gas can contribute to the formation of ground-level ozone, which can negatively impact wildlife, plants, and human health (Zhang et al., 2019; Zhang et al., 2022). Further, fugitive methane emissions are chronically underestimated and difficult to measure (Beugin, 2024). The ER states that the Proponent will monitor and inspect the well and pipeline using vehicles and foot	Enbridge Gas currently manages its fugitive emissions, in accordance with industry accepted best management practices, to reduce emissions from its operations. In July 2020, Enbridge Gas has implemented a harmonized leak operating program, which includes: 1. increased traceability and tracking of leak repairs, 2. increased monitoring frequencies, 3. harmonized repair timelines for above ground leaks, and 4. initiation of a station leak survey program. With respect to compressor stations, a leak survey of the entire facility is performed three times a year with repairs being made within federal and provincial regulatory reporting timeframes. Pipelines are inspected annually by way of a foot patrol, during which a leak survey is conducted. Wells are inspected quarterly by Enbridge operators, during which a leak survey is conducted. The results of these surveys are tracked and applied to the appropriate fugitive emission calculations within Enbridge Gas’s federal and provincial emissions regulatory reporting. During Project construction, groundwater quantity and quality will be monitored through the Water Well Monitoring Program. No groundwater monitoring programs are required for the operations phase. The well will be continuously monitored for any integrity issues that may lead to accidents or incidents resulting in impacts to groundwater.

		patrols. It also states it will monitor the pipeline remotely and through depth cover surveys, in-line inspections, integrity digs, and leak surveys. However, there is little detail provided as to the nature of these inspections. This is important as leaks “may result in negative environmental impacts (for example, greenhouse gas emissions and contamination of surface and groundwater)”. More detail is warranted to help ensure that the health and safety of the environment and CKSPFN members are protected. COMMENT: The Proponent should: - Commit to monitoring for fugitive greenhouse gas emissions, which could include monitoring via satellite (e.g., GHGS at); - Describe the frequency and methodology for inspections/leak surveys; - Ensure the monitoring frequency and methodologies include consideration of human health and the environment; - Consider the cumulative effects of fugitive emissions; and - Describe how groundwater quality will be monitored	
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		throughout construction and operation.	
26	10.0 Inspection and Monitoring Recommendations p. 117	ISSUE: The ER states that Environmental Monitors (typically qualified professionals) will be used as needed during construction (e.g., when handling wildlife). COMMENT: CKSPFN is interested in participating in construction and post-construction monitoring.	Enbridge Gas plans to offer three site visits for Indigenous communities who participated in the consultation portion of the Project's environmental study, including CKSPFN. These visits will be performed prior, during and post construction, which will allow for vegetation survival inspections and a walking inspection to determine whether areas require further restoration.

Line-item attachment 3.0

 Map.pdf 204 KB	 Waubuno Notification - COTTfN.pdf 185 KB
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From: Kevin Berube <kevin.berube@enbridge.com>
Sent: Wednesday, May 22, 2024 7:48 AM
To: Jennifer Mills <jmills@cottfn.com>
Subject: Initial Notification - Waubano

Good morning Jen,

This email is to notify you of a planned upcoming project. The project does not trigger an LTC, however I am engaging based on Enbridge's Lifecycle Engagement protocols and keeping you informed of our work in the area.

Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

Enbridge Gas has reached out to the Ministry of Energy for delegation of the Duty to Consult and we expect to hear from them in the next couple of weeks.

There will also be upcoming Stage 2 Archaeology fieldwork and TMHC will be reaching out for monitoring opportunities.

Please see the attached letter to learn more.

Any questions please don't hesitate to reach out.

Thanks Jen.

Kevin Berube

Sr. Advisor, Community and Indigenous Engagement, Eastern Region

Public Affairs, Communications and Sustainability
500 Consumers Road



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

May 22, 2024

Chippewa of the Thames First Nation
320 Chippewa Road
Muncey, ON N0L 1Y0

Dear Jennifer,

Enbridge Gas – Notice of Upcoming Project for the 2025 Waubuno Well Drilling Project

This letter is to notify you of a proposed upcoming project in your area.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

The drilling of well is needed to replace the deliverability lost in the Waubuno Storage Pool due to well relines and abandonments.

The 2025 Waubano Well Drilling Project is proposed to be undertaken pending a positive recommendation from the Ontario Energy Board (OEB) to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the OEB Act.

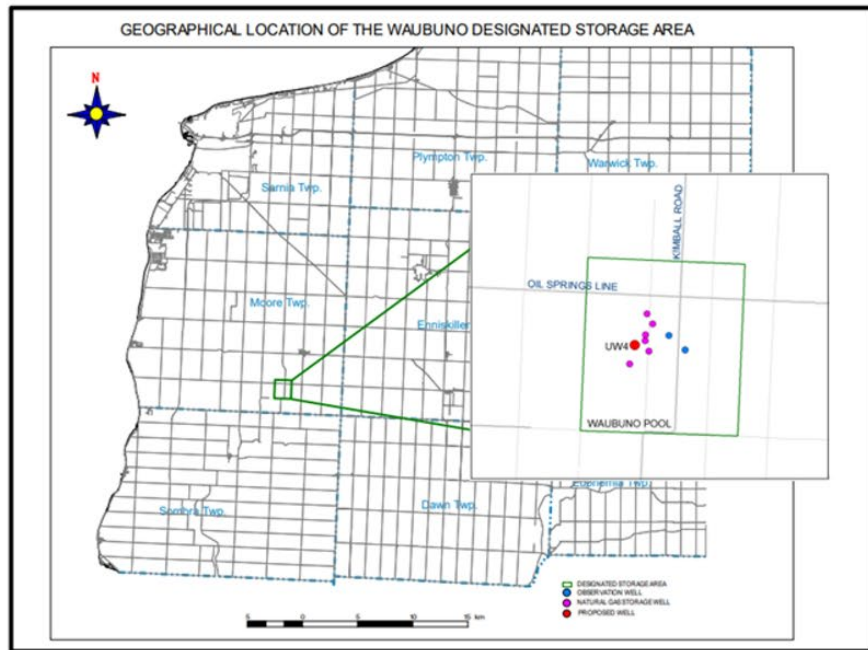
In support of this upcoming OEB application, Enbridge Gas will be undertaking environmental studies in 2024 to review the proposed construction and operation of the project. The environmental studies will include a consultation program, impact assessment, and a cumulative effects assessment.

Enbridge Gas is committed to undertaking consultation with Indigenous Communities and local stakeholders as an integral component of the planning process. Additional details regarding the project and how to become involved during public consultation will be provided in future correspondence. If you have any questions or comments during the development stages of this project, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Berube', on a light blue background.

Kevin Berube
Senior Advisor, Community and Indigenous Engagement
Enbridge Gas
kevin.berube@enbridge.com
416 666 6759



Line-item attachment 3.1

From: Liam Browne <lbrowne@tmhc.ca>
Sent: Friday, May 24, 2024 9:15 AM
To: Jennifer Mills <jmills@cottfn.com>
Cc: Matthew Beaudoin <mbeaudoin@tmhc.ca>; Jennifer Donnelly <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Bill Olds <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com
Subject: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Jennifer,

TMHC has been contacted through Dillon Consulting Limited to complete a Stage 1-2 archaeological assessment for Enbridge Gas Inc.'s Waubuno Well Drilling Project in the Township of St. Clair, Lambton County. The project area is

roughly 7 acres in size (see attached Fieldmap - <https://maps.app.goo.gl/GfbPD6yAyHuSxycW7>).

At this point, there are no archaeological sites registered within 1 km of the project area. The project area is located on level ground above the valley associated with Bear Creek. As the project area is located within an active agricultural field, it will be assessed via pedestrian survey. We are anticipating completing this work on June 7. Would Chippewas of the Thames like to be involved in this fieldwork?

If you have any questions about the specifics of Enbridge's project please let us know. If there are any questions regarding the archaeological assessment I would be happy to discuss further. Contracts for this project will be signed by Enbridge (Chasity.Pilecki@enbridge.com).

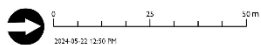
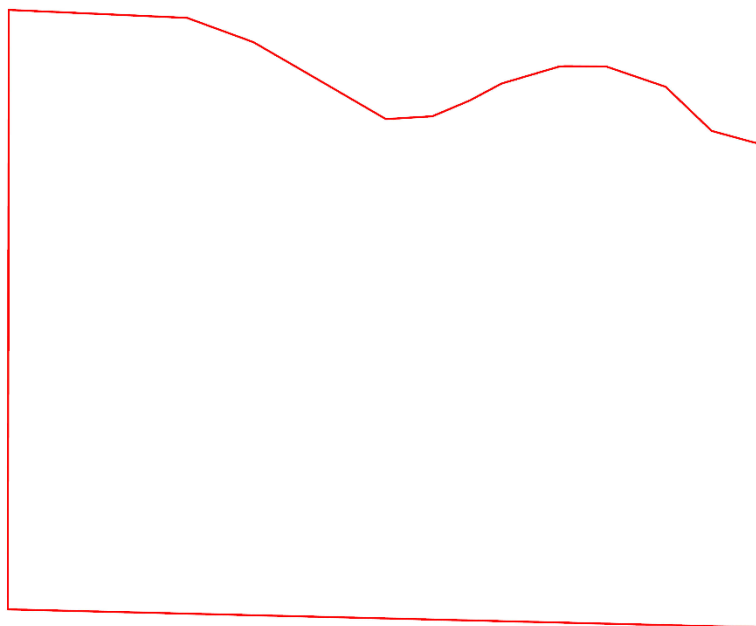
Best,
Liam



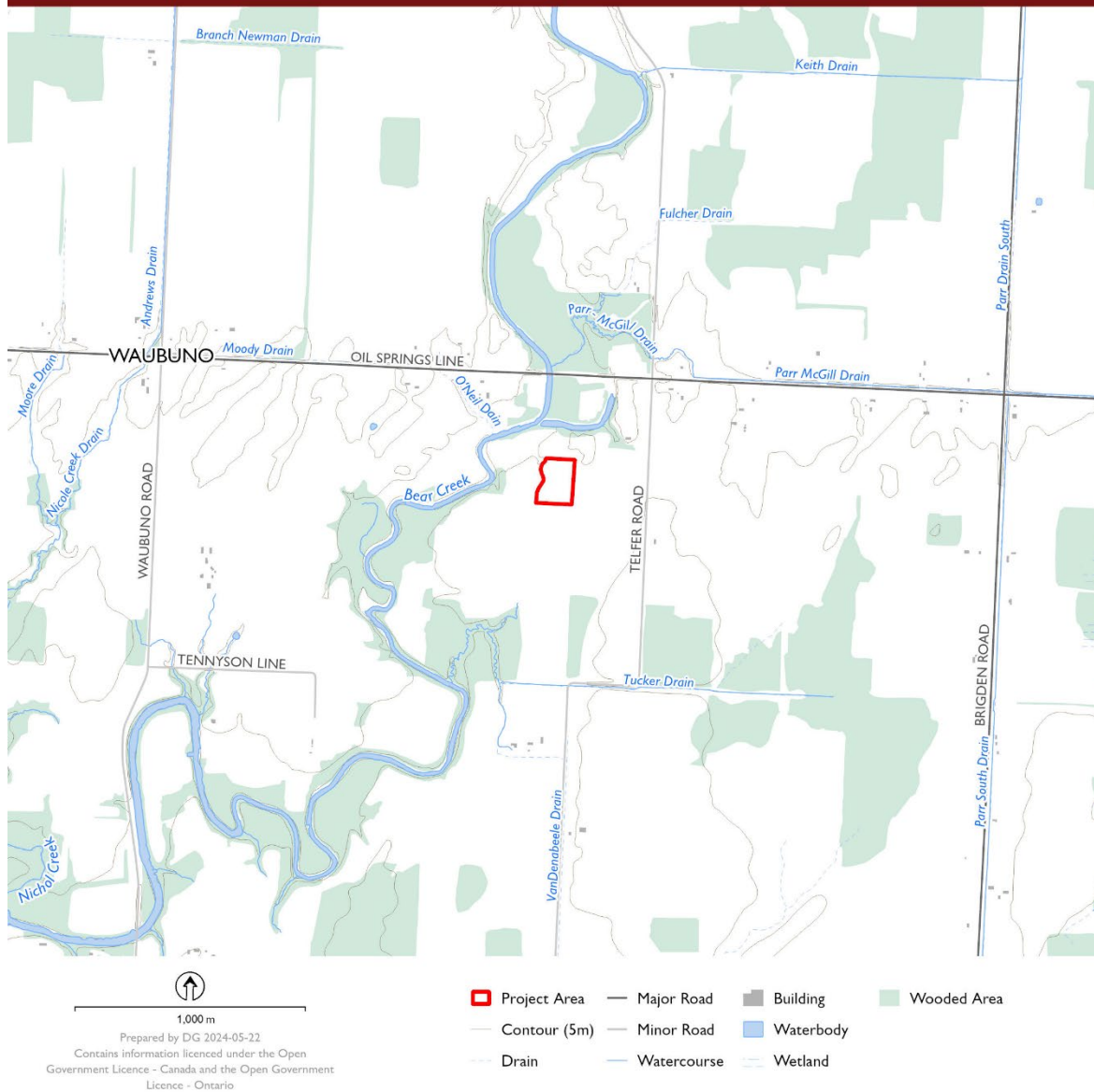
Liam Browne, MA, P1048
Pipeline Archaeological Projects Unit Manager
lbrowne@tmhc.ca
519-282-0095

TMHC Inc.
1108 Dundas Street, Unit 105
London, ON | N5W 3A7
www.tmhc.ca
519-641-7222

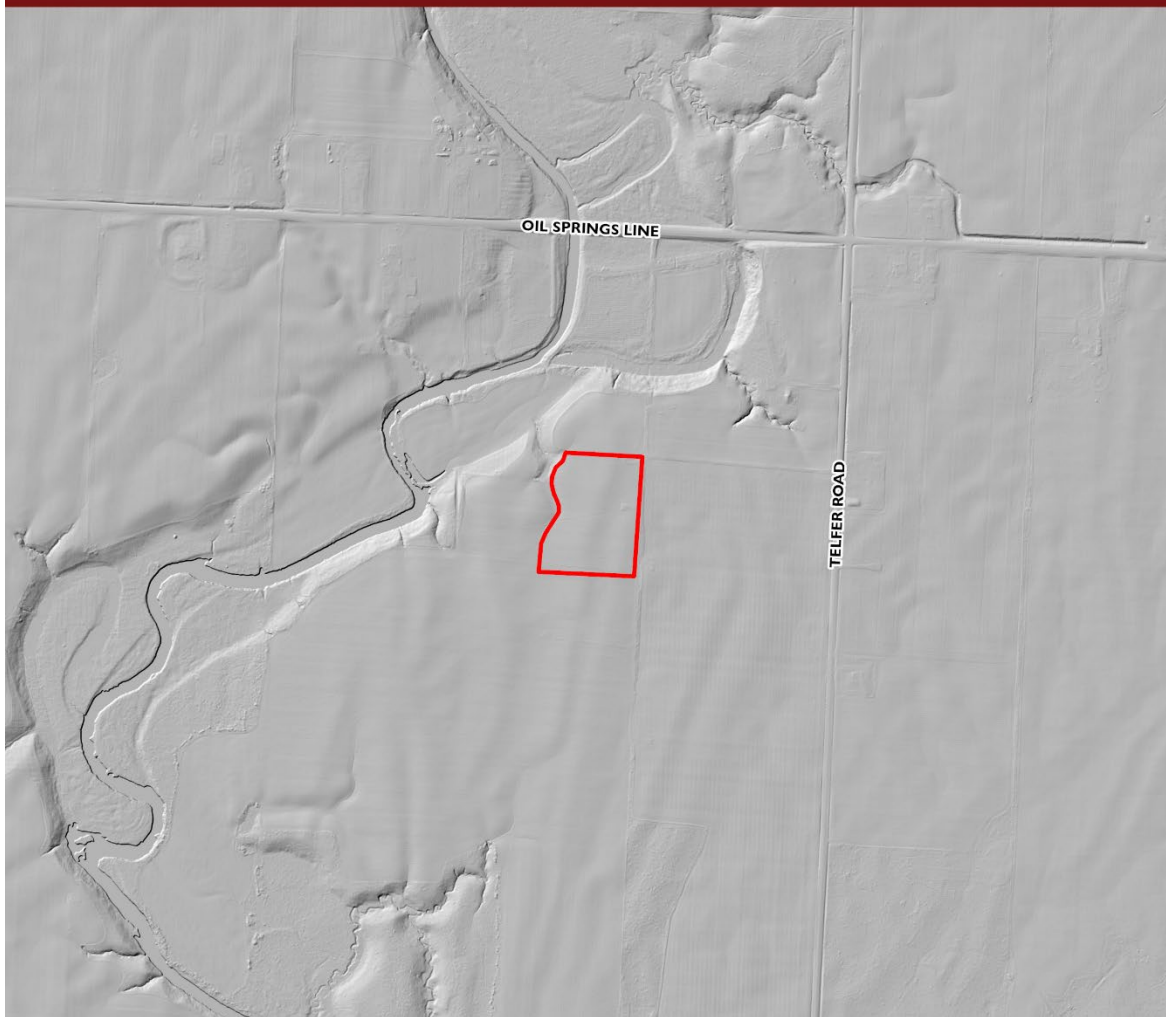
2024-141 D-E Waubuno Well Drill, St. 1-2



PROJECT LOCATION



ONTARIO DIGITAL TERRAIN MODEL (LIDAR-DERIVED)
GOVERNMENT OF CANADA (2023)



500 m

Prepared by DG 2024-05-22
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Licence - Ontario

 Project Area

Line-item attachment 3.11

From: [Kevin Berube](#)
To: [Jennifer Mills](#)
Subject: Waubano Well Drilling NOC
Date: Monday, August 19, 2024 1:48:47 PM
Attachments: [248218_2025WellDrilling_Ad_final.pdf](#)
[Map.pdf](#)
[2025_Waubano_Well_Drilling_Project_NOC_COTTEN.pdf](#)
[image001.png](#)

Good Afternoon Jen,

Please find attached the notification of commencement for the Waubano Well Drilling Project along with the invitation to the Virtual Information Session and map of the area. If you have any questions please do not hesitate to contact me.

Thanks Jen,

Kevin Berube

Sr. Advisor, Community and Indigenous Engagement, Eastern Region

Public Affairs, Communications and Sustainability
500 Consumers Road
North York, ON
M2J 1P8

Cell: 416 666 6759





Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

August 19, 2024

To: Jennifer Mills
Chippewa of the Thames First Nation

Re: Enbridge Gas Inc.
Proposed 2025 Waubuno Well Drilling Project
Township of St. Clair (Lambton County), Ontario
Notice of Study Commencement and Virtual Public Information Session

Dear Jennifer,

I am reaching out to provide your community with the attached Notice of Study Commencement and Virtual Public Information Session for the proposed 2025 Waubuno Well Drilling Project in Lambton County.

Enbridge Gas Inc. (Enbridge Gas) has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023)*. The study will review the need and justification for the project, describe the existing natural, cultural, and socio-economic environment, evaluate the project from a natural, cultural and socio-economic environmental perspective, outline safety measures and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of a well drilling licence under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.

As part of the initial phase of the study, we are collecting information on cultural, socio-economic, natural environment, at the proposed well sites. Examples of data being collected include information on archaeological and heritage resources, terrestrial and aquatic vegetation and wildlife, groundwater,

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.

surface water, soils, geology, existing infrastructure, and human occupancy and resource use in the area. Enbridge Gas' preliminary work on the Project has identified the following potential authorizations:

Federal:

- N/A

Provincial:

- Ministry of Citizenship and Multiculturalism – Archaeological Assessment and Cultural Heritage Assessment.
- Ministry of the Environment, Conservation and Parks – 1. Permit to Take Water or Environmental Activity and Sector Registry 2. Endangered Species Act permits.
- St. Clair Region Conservation Authority

Municipal:

- Township of St. Clair
- County of Lambton

Other:

- N/A

Other authorizations, notifications, permits, and/or approvals may be required in addition to those identified above.

We would like to consult with your community on the proposed Project. We are interested in your community's feedback, whether in writing or through a face-to-face meeting, relating to, among other things:

- Any information the community has available that Enbridge Gas should consider when preparing documentation related to the Project;
- Any information the community may have regarding the potential adverse impacts the Project may have on your Aboriginal or treaty rights.
- Any suggestions or proposals on avoiding, minimizing or mitigating any potential adverse impacts.
- Guidance on how you would like information provided to us to be collected, stored, used and shared.

While Enbridge Gas is interested in meeting at any time during the Project development process, we would appreciate the opportunity to meet early to discuss the preliminary preferred and alternative routing identified above, any concerns the community may have with those routes and any potential adverse impacts the Project may have on your Aboriginal or treaty rights. We will forward the Environmental Report for the Project for review and comment once it is available and would be pleased to participate in further meetings to discuss and address any questions or concerns. As part of Enbridge Gas' engagement on the Project, Indigenous communities will have the opportunity to participate in fieldwork and Enbridge Gas will reach out in the future with further details.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the Project, and to allow for meaningful consultation. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your team's engagement in relation to the Project.

Enbridge Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor, Indigenous Energy Policy
chloe.lazakis@ontario.ca

Indigenous engagement will play a key role in the project. As noted in the attached Notice of Study Commencement and Virtual Public Information Session, the project team is hosting a Virtual Public Information Session at <https://www.waubunowelldrilling.ca/> from **Thursday, August 29 to Friday, September 6, 2024**. Enbridge Gas looks forward to engaging with your community to ensure your community's interests are being properly understood and considered. The project team would like to invite your community to participate in the upcoming Virtual Public Information Session and provide comments regarding the proposed project. Specifically, Enbridge Gas would appreciate your input on any potential impacts that the project may have on Chippewa of the Thames First Nation, including any Aboriginal and Treaty Rights, and any measures to mitigate those potential adverse impacts.

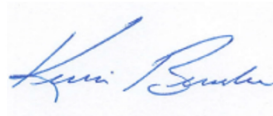
Kindly indicate whether your community is interested in participating in the engagement activities on or before **Monday, September 23, 2024**. If you are unable to respond by the above date and are intending to do so, please provide an alternative date for when the project team may expect a response.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the project, and to allow for meaningful engagement. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your community's engagement in relation to this project.

Enbridge Gas would be interested in meeting with Chippewa of the Thames First Nation to share project-related information and discuss any comments or concerns you may have. If you wish to meet, please provide potential dates and times that would work best for a meeting with your community representatives. Alternatively, please advise if you do not wish to meet but would prefer to be kept informed of the project.

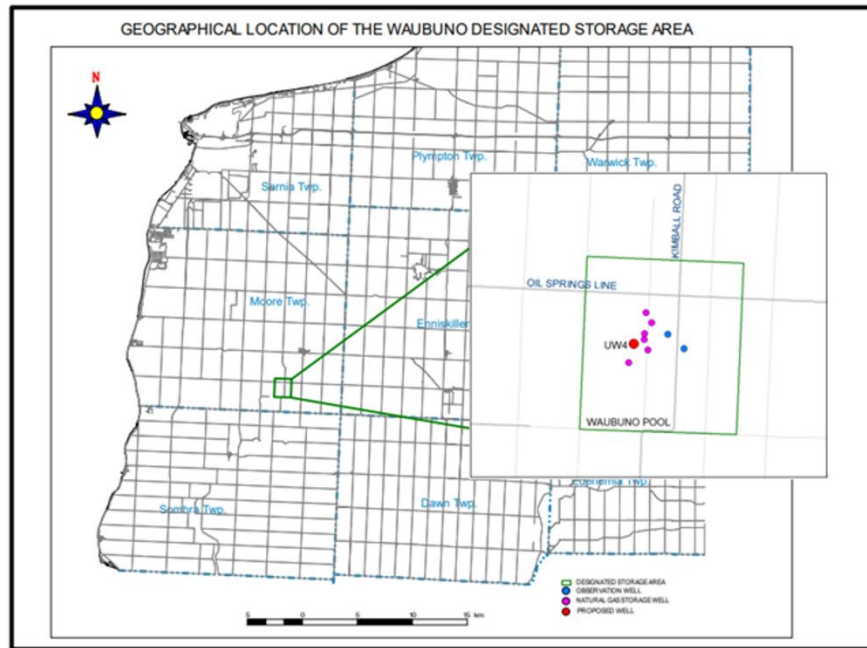
On behalf of the project team, thank you in advance for your consideration regarding the initial phases of the project. Please do not hesitate to contact me with any questions you may have.

Sincerely,



Kevin Berube
Senior Advisor, Community & Indigenous Engagement,
Public Affairs, Communications & Sustainability
Enbridge Gas Inc.
Cell: 416 666 6759
kevin.berube@enbridge.com

Attachment: Notice of Study Commencement and Virtual Public Information Session



Proposed 2025 Waubuno Well Drilling Project
Notice of Study Commencement and Virtual Public Information Session
 TOWNSHIP OF ST. CLAIR (LAMBTON COUNTY), ONTARIO
 ENBRIDGE GAS INC.

The Study

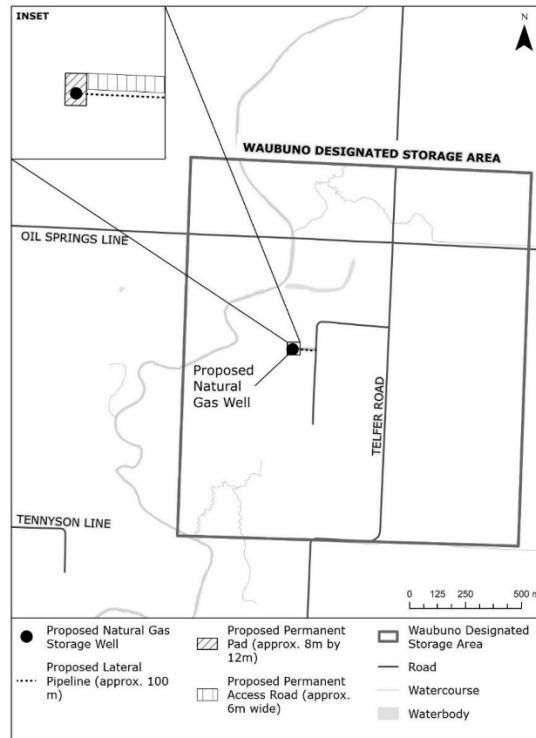
Enbridge Gas has retained Dillon Consulting to undertake an environmental study for the proposed 2025 Waubuno Well Drilling Project in Lambton County, Ontario.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 metres of 8-inch natural gas pipeline in the Waubuno Designated Storage Area (DSA) – an area of land designated by the Ontario Energy Board (OEB) under section 36.1(1)(a) of the *OEB Act*, which contains geological formations suitable for the storage of natural gas underground.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair. Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The Process

The study is being conducted in accordance with the *OEB's Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural and socio-economic environment, evaluate the project from a natural, cultural, and socio-economic perspective, outline safety measures, and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.



Invitation to the Community

Stakeholder and Indigenous consultation is a key component of this study. Members of the general public, landowners, government agencies, Indigenous communities, and other interested parties are invited to participate in the study. We are hosting a Virtual Public Information Session to provide you with an opportunity to review the project and provide input.

To access the Virtual Public Information Session, visit: www.WaubunoWellDrilling.ca from **Thursday, August 29, 2024 to Friday, September 6, 2024**.

If you are interested in participating or would like to provide comments, please visit the Virtual Public Information Session or contact one of the individuals listed below through the project email. The last day to submit comments for consideration in the draft environmental study is **September 23, 2024**. You can also visit the **Enbridge Gas Project Website** at www.enbridgegas.com/2025WellProject.

Project Contacts
Bill Olds
 Project Manager
 Dillon Consulting Limited

Project Email:
2025waibunowellproject@dillon.ca
Telephone: 905-905-5521



Line-item attachment 3.16

From: [Lauren Whitwham](#)
To: jmills@cottfn.com
Cc: [Kevin Berube](#)
Subject: 2025 Waubuno Project Final ER
Date: Monday, October 7, 2024 4:52:34 PM

Hi there,

I am reaching out, on behalf of Kevin who is on travelling for work today. Enbridge Gas wanted to let you know that the Environmental Report (ER) for the 2025 Waubuno Well Drilling Project is now available for review.

Enbridge Gas is proposing to drill one new natural gas storage well and construct 100 m of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA), in the township of St. Clair, Ontario.

With a favourable report from the Ontario Energy Board (OEB) to the Minister of Natural Resources, pursuant to Section 40(1) of the OEB Act, drilling of the well and construction of the pipeline are anticipated to begin in spring of 2025.

In accordance with the OEB's Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition (2023), Enbridge Gas is submitting the ER for the Project for OPCC review. Enbridge Gas has retained Dillon Consulting Limited, an independent environmental consultant, to complete the ER for the proposed project.

The ER can be found at the following link using the provided credentials:

URL: <https://dl.dillon.ca/index.php/login>

Username: Enbridge_Public

Password: HhEXiE2789ns

We are requesting feedback by **November 18, 2024**.

Capacity funding is available to enable you to engage in timely technical reviews of documents, participation in field work associated with proposed projects, and to engage in meaningful consultation. If you could provide Kevin with a quote or proposal, that would be greatly appreciated.

If you require any further information at this time, please do not hesitate to contact Kevin.

Thanks,
Lauren

Line-item attachment 3.18

From: Jennifer Mills <jmills@cottfn.com>
Sent: Tuesday, November 19, 2024 10:33 AM
To: Kevin Berube <kevin.berube@enbridge.com>
Subject: [External] RE: VPIS Slides Waubano

CAUTION! EXTERNAL SENDER

Were you expecting this email? TAKE A CLOSER LOOK. Is the sender legitimate?

DO NOT click links or open attachments unless you are 100% sure that the email is safe.

Hi Kevin

I put this in NationsConnect too but please see attached response to Waubano ER. There are a few questions and comments.

Thanks

Jen



Deshkan Zibiing
Chippewas of the Thames
First Nation Treaties, Lands
and Environment

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com

November 19, 2024

Kevin Berube
Sr. Advisor, Community and Indigenous Engagement
Enbridge Gas Inc.
kevin.berube@enbridge.com

Re: Waubano Well Drilling Draft Environmental Report

The Consultation and Accommodation Unit of Deshkan Zibiing (Chippewas of the Thames First Nation) received the Environmental Report for the 2025 Waubano Well Drilling project, which is in COTTFN's Traditional Territory. It is also located in the land selection area of the Big Bear Creek Settlement Agreement (2013). Without prejudice to the protected rights and interests of COTTFN, we would like to offer the following comments and questions:

- The Environmental Report does not mention the Treaty context (Huron Tract) or Indigenous occupation of the area. When we raised this for the Watford ER, Enbridge responded that the cumulative effects section focuses on Euro-settler history because that is when significant disturbances to the landscape began. Even so, it is inappropriate to not acknowledge Indigenous history and the Treaty context in the main body of the report (outside of TMHC's archaeological assessment). Enbridge must address this issue with Dillon for future reports.
- The ER states that this new well is required to replace deliverability in the Waubano DSA due to well relines and abandonments. With this proposed well, how many wells will there be in the Waubano DSA? Please provide more detail as to why wells have been abandoned. Would this project change the working capacity of the DSA or only maintain existing capacity?
- We note that Enbridge's gas storage facilities in the area, including the Waubano DSA, pre-dated meaningful consultation and accommodation with Rights Holders. Further to the discussions at the Indigenous Working Group, we request ongoing dialogue with Enbridge on accommodation for impacts in COTTFN's territory.

Regards,

Consultation and Accommodation Unit
Treaties, Lands and Environment Dept.
Chippewas of the Thames First Nation

Line-item attachment 3.19

From: [Kevin Berube](#)
To: [Jennifer Mills](#)
Subject: Responses to Waubano ER Questions
Date: Thursday, December 5, 2024 8:01:26 AM
Attachments: [Enbridge Gas responses to COTTfN comments Waubano FINAL.pdf](#)
[image001.png](#)

Good morning Jen,

Please find attached the responses to the questions and comments you submitted on November 19 with respect to the Waubano ER. Let me know if you would like to meet to discuss and we can confirm a date. If you have any other questions please do not hesitate to reach out.

Thanks,

Kevin Berube

Sr. Advisor, Community and Indigenous Engagement, Eastern Region

Enbridge Gas Inc. ("Enbridge Gas") Responses to Chippewas of the Thames First Nation ("COTTFN") comments on the Waubuno Well Drilling Project ("Project") Environmental Report

Enbridge Gas' Responses to COTTFN Comments received on November 19, 2024 on the Waubuno Well Drilling Project Environmental Report

Item	COTTFN comment	Enbridge Gas response
1	The Environmental Report does not mention the Treaty context (Huron Tract) or Indigenous occupation of the area. When we raised this for the Watford ER, Enbridge responded that the cumulative effects section focuses on Euro-settler history because that is when significant disturbances to the landscape began. Even so, it is inappropriate to not acknowledge Indigenous history and the Treaty context in the main body of the report (outside of TMHC's archeological assessment). Enbridge must address this issue with Dillion for future report.	Dillon has revised the Cumulative Effects Section of the ER to include Treaty History and Indigenous histories more generally. A subsection under the Cumulative Effects Section has been added titled "Treaty History" and includes the following: Indigenous peoples have used the lands that are now known as Lambton County for thousands of years. Prior to the displacement caused by early European settlement, this area was actively used for hunting by a number of Anishinaabe peoples. The area which became the Township of St. Clair was part of the Huron Tract, approximately 2.76 million acres of land subject to Provisional Treaty No. 27 ½ between the local Chippewas nations and the British Crown signed on April 26, 1825 (Surtees, 1984). An earlier 1819 agreement was never realized and for six years the territory remained in limbo. The provisional treaty was finally reached as a result of John Galt's intention to form the Canada Company which required on million acres of land to sell to prospective settlers (Surtees, 1894). The Chippewas nations transferred most of the Huron Tract to the Crown but maintained their territories in four reserve lands along the St. Clair River and on the shores of Lake Huron near Kettle Point and the Ausable River (River aux Sable). These reserves would become the Aamjiwnaang First Nation and the Chippewas of Kettle and Stony Point First Nation. The agreement was formalized in 1827 through Treaty No. 29 (Canadian Legal Information Institute 2000; Duern 2017).
2	The ER states that this new well is required to replace deliverability in the Waubano DSA due to well relines and abandonments. With this proposed well, how many wells will there be in the Waubano DSA? Please provide more detail as to why wells have been abandoned. Would this project change the working capacity of the DSA or only maintain existing capacity?	Currently we have 8 active wells (6 Injection withdrawal wells and 2 observation wells), as part of this project one of the existing wells will be abandoned. Hence, the drilling of this new well will maintain the number of wells at 8.
		Well abandonments are due to any integrity concerns that can result in increased operating risk. One well was abandoned in 2016 in the Waubuno DSA, and another will be abandoned as part of this project. The abandonment of this one well as part of this project is due to periodic lack of access to the well during flood events (most often in the spring), which will hinder the ability to respond to any well incident situation on the well. This project will not change the working capacity of the DSA, it will only replace the lost deliverability.
3	We note that Enbridge's gas storage facilities in the area, including the Waubano DSA, pre-dated meaningful consultation and accommodation with Rights Holders. Further to the discussions at the Indigenous Working Group, we request ongoing dialogue with Enbridge on accommodation for impacts in COTTFN's territory.	Enbridge Gas will continue to engage in ongoing dialogue with COTTFN regarding potential impacts of its projects on COTTFN, including how any impacts may be mitigated.

Line-item attachment 4.0

From: Kevin Berube
Sent: Wednesday, May 22, 2024 7:49 AM
To: environment@oneida.on.ca
Subject: Initial Notification - Waubano

Good morning Jenelle,

This email is to notify you of a planned upcoming project. The project does not trigger an LTC, however I am engaging based on Enbridge's Lifecycle Engagement protocols and keeping you informed of our work in the area.

Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

Enbridge Gas has reached out to the Ministry of Energy for delegation of the Duty to Consult and we expect to hear from them in the next couple of weeks.

There will also be upcoming Stage 2 Archaeology fieldwork and TMHC will be reaching out for monitoring opportunities.

Please see the attached letter to learn more.

Any questions please don't hesitate to reach out.

Thanks Jenelle.



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

May 22, 2024

Oneida Nation of the Thames
2212 Elm Ave.
Southwold, ON N0L 2G0

Dear Jenelle,

Enbridge Gas – Notice of Upcoming Project for the 2025 Waubuno Well Drilling Project

This letter is to notify you of a proposed upcoming project in your area.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

The drilling of well is needed to replace the deliverability lost in the Waubuno Storage Pool due to well relines and abandonments.

The 2025 Waubano Well Drilling Project is proposed to be undertaken pending a positive recommendation from the Ontario Energy Board (OEB) to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the OEB Act.

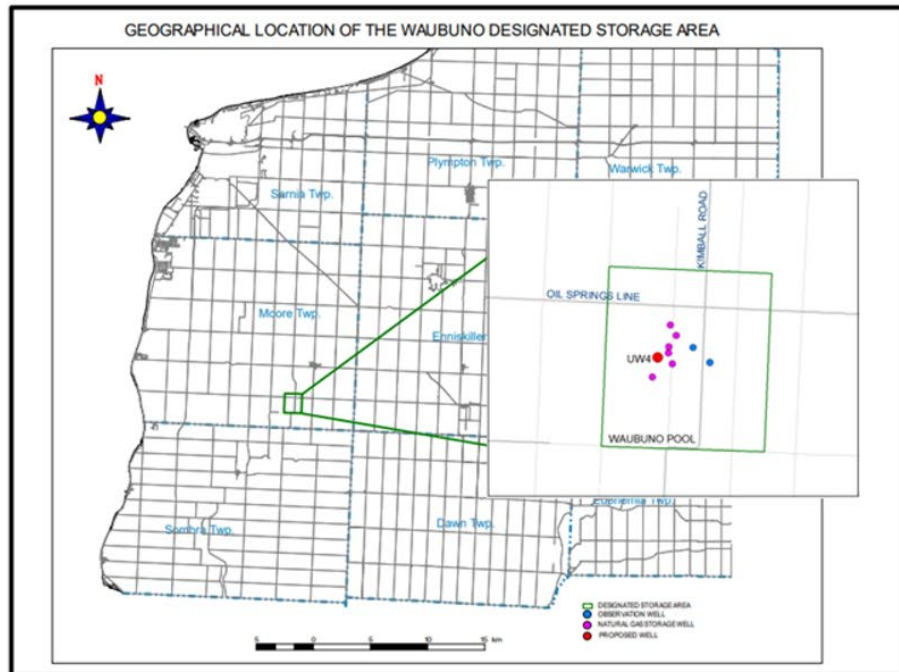
In support of this upcoming OEB application, Enbridge Gas will be undertaking environmental studies in 2024 to review the proposed construction and operation of the project. The environmental studies will include a consultation program, impact assessment, and a cumulative effects assessment.

Enbridge Gas is committed to undertaking consultation with Indigenous Communities and local stakeholders as an integral component of the planning process. Additional details regarding the project and how to become involved during public consultation will be provided in future correspondence. If you have any questions or comments during the development stages of this project, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Berube', on a light blue background.

Kevin Berube
Senior Advisor, Community and Indigenous Engagement
Enbridge Gas
Kevin.berube@enbridge.com
416 666 6759



Line-item attachment 4.1

From: Liam Browne <lbrowne@tmhc.ca>
Sent: May 24, 2024 9:15 AM
To: 'Jenelle Cornelius' <environment@oneida.on.ca>; lutahawit@execulink.com
Cc: Matthew Beaudoin <mbeaudoin@tmhc.ca>; Jennifer Donnelly <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Bill Olds <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com
Subject: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Al and Jenelle,

TMHC has been contacted through Dillon Consulting Limited to complete a Stage 1-2 archaeological assessment for Enbridge Gas Inc.'s Waubuno Well Drilling Project in the Township of St. Clair, Lambton County. The project area is

roughly 7 acres in size (see attached Fieldmap - <https://maps.app.goo.gl/GfbPD6yAyHuSxycW7>).

At this point, there are no archaeological sites registered within 1 km of the project area. The project area is located on level ground above the valley associated with Bear Creek. As the project area is located within an active agricultural field, it will be assessed via pedestrian survey. We are anticipating completing this work on June 7. Would Oneida like to be involved in this fieldwork?

If you have any questions about the specifics of Enbridge's project please let us know. If there are any questions regarding the archaeological assessment I would be happy to discuss further. Contracts for this project will be signed by Enbridge (Chasity.Pilecki@enbridge.com).

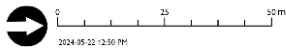
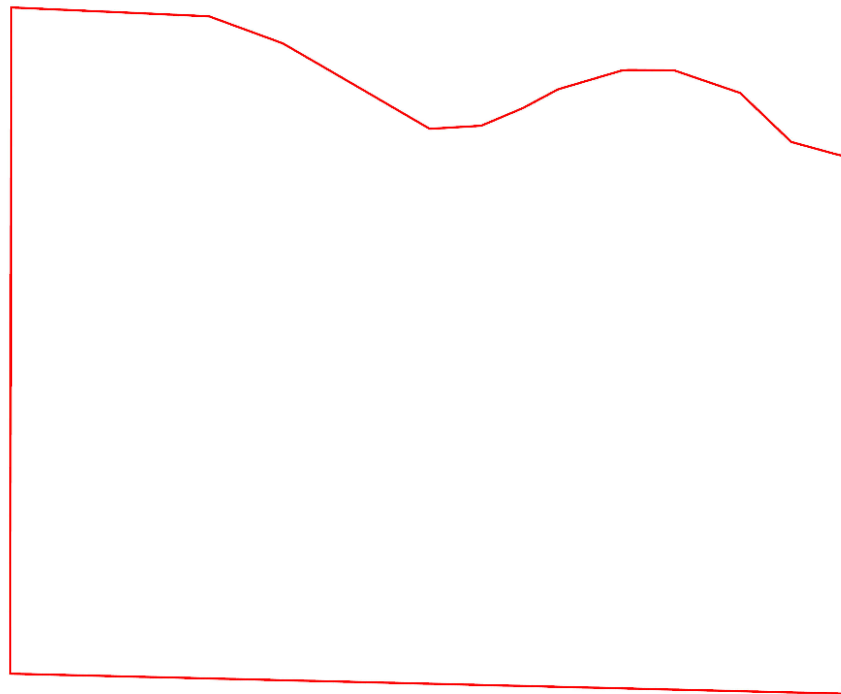
Best,
Liam



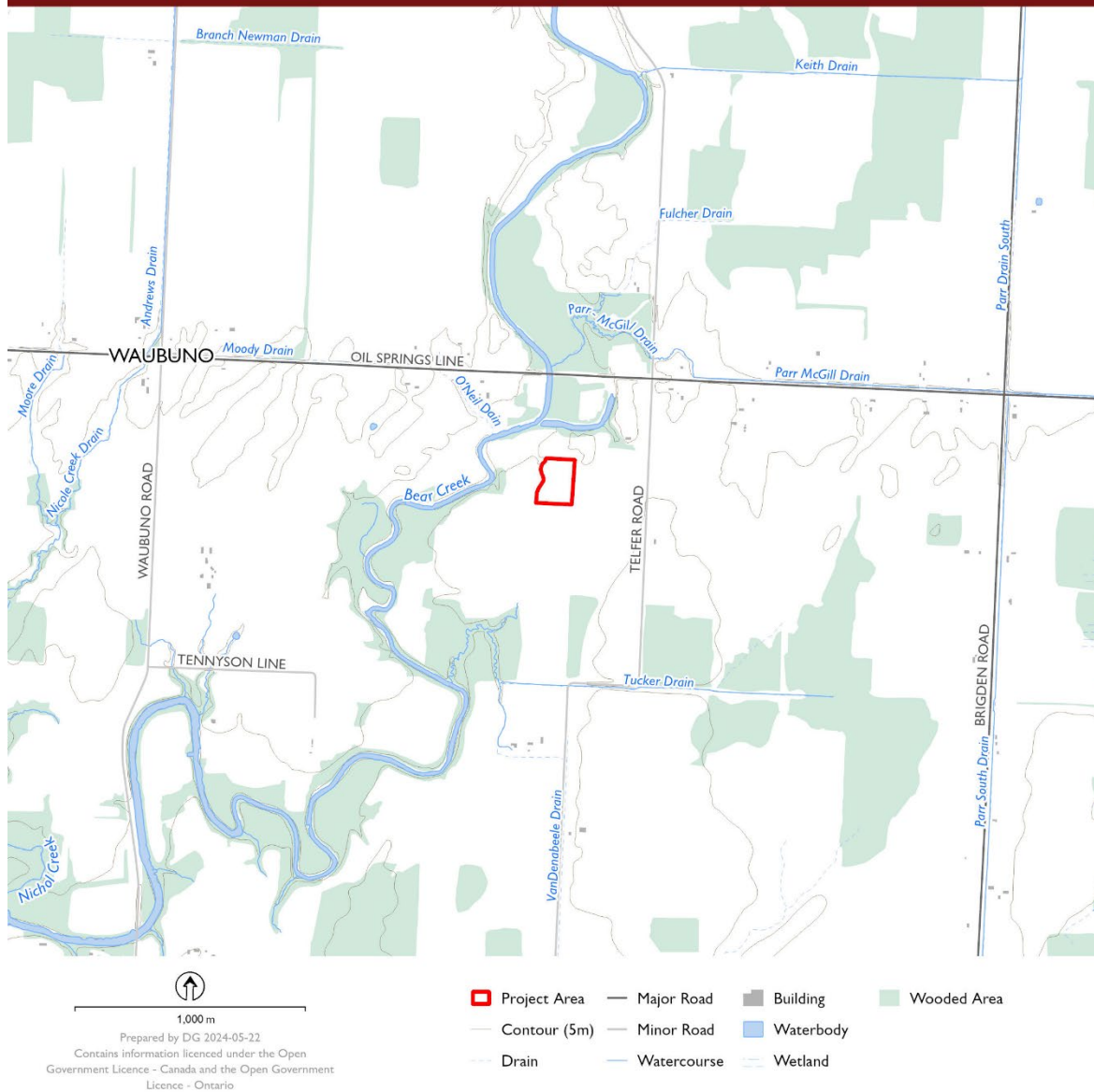
Liam Browne, MA, P1048
Pipeline Archaeological Projects Unit Manager
lbrowne@tmhc.ca
519-282-0095

TMHC Inc.
1108 Dundas Street, Unit 105
London, ON | N5W 3A7
www.tmhc.ca
519-641-7222

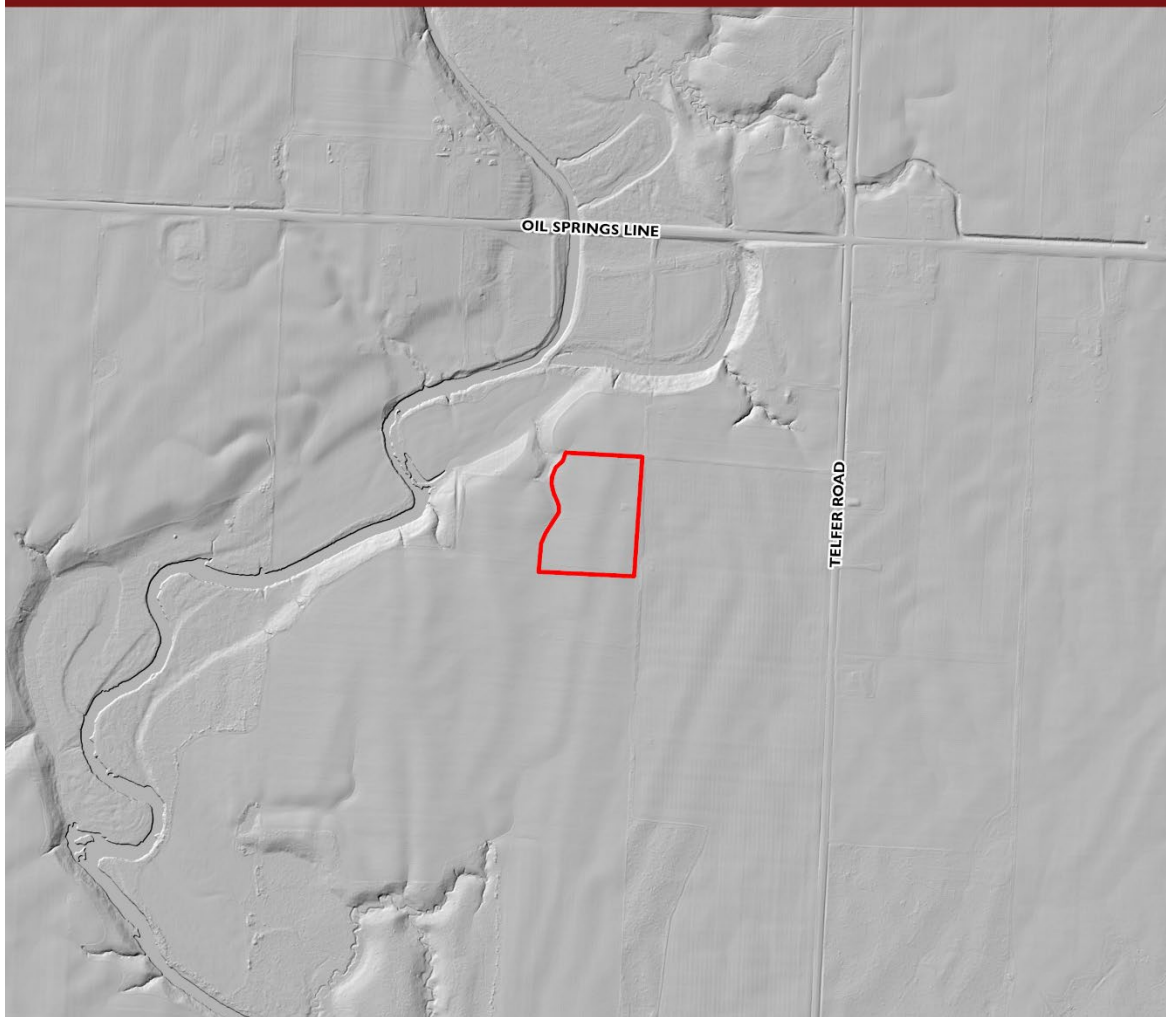
2024-141 D-E Waubuno Well Drill, St. 1-2



PROJECT LOCATION



ONTARIO DIGITAL TERRAIN MODEL (LIDAR-DERIVED)
GOVERNMENT OF CANADA (2023)



500 m

Prepared by DG 2024-05-22
Contains information licenced under the Open
Government Licence - Canada and the Open Government
Licence - Ontario

 Project Area

Line-item attachment 4.6

From: [Kevin Berube](#)
To: environment@oneida.on.ca
Subject: Notifications Waubano
Date: Monday, August 19, 2024 1:45:09 PM
Attachments: [image001.png](#)
[2025 Waubano Well Drilling Project NOC Oneida.pdf](#)
[248218_2025WellDrilling_Ad_final.pdf](#)
[Map.pdf](#)

Good afternoon Jenelle,

Please find attached the notification of commencement for the Waubano Well Drilling Project along with the invitation to the Virtual Information Session and map of the area. If you have any questions please do not hesitate to contact me.

Meegwetch,

Kevin Berube

Sr. Advisor, Community and Indigenous Engagement, Eastern Region

Public Affairs, Communications and Sustainability
500 Consumers Road
North York, ON
M2J 1P8

Cell: 416 666 6759





Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

August 19, 2024

**To: Jenelle Cornelius
Oneida Nation of the Thames**

**Re: Enbridge Gas Inc.
Proposed 2025 Waubuno Well Drilling Project
Township of St. Clair (Lambton County), Ontario
Notice of Study Commencement and Virtual Public Information Session**

Dear Jenelle,

I am reaching out to provide your community with the attached Notice of Study Commencement and Virtual Public Information Session for the proposed 2025 Waubuno Well Drilling Project in Lambton County.

Enbridge Gas Inc. (Enbridge Gas) has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural, and socio-economic environment, evaluate the project from a natural, cultural and socio-economic environmental perspective, outline safety measures and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of a well drilling licence under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.

As part of the initial phase of the study, we are collecting information on cultural, socio-economic, natural environment, at the proposed well sites. Examples of data being collected include information on archaeological and heritage resources, terrestrial and aquatic vegetation and wildlife, groundwater,

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.

surface water, soils, geology, existing infrastructure, and human occupancy and resource use in the area. Enbridge Gas' preliminary work on the Project has identified the following potential authorizations:

Federal:

- N/A

Provincial:

- Ministry of Citizenship and Multiculturalism – Archaeological Assessment and Cultural Heritage Assessment.
- Ministry of the Environment, Conservation and Parks – 1. Permit to Take Water or Environmental Activity and Sector Registry 2. Endangered Species Act permits.
- St. Clair Region Conservation Authority

Municipal:

- Township of St. Clair
- County of Lambton

Other:

- N/A

Other authorizations, notifications, permits, and/or approvals may be required in addition to those identified above.

We would like to consult with your community on the proposed Project. We are interested in your community's feedback, whether in writing or through a face-to-face meeting, relating to, among other things:

- Any information the community has available that Enbridge Gas should consider when preparing documentation related to the Project;
- Any information the community may have regarding the potential adverse impacts the Project may have on your Aboriginal or treaty rights.
- Any suggestions or proposals on avoiding, minimizing or mitigating any potential adverse impacts.
- Guidance on how you would like information provided to us to be collected, stored, used and shared.

While Enbridge Gas is interested in meeting at any time during the Project development process, we would appreciate the opportunity to meet early to discuss the preliminary preferred and alternative routing identified above, any concerns the community may have with those routes and any potential adverse impacts the Project may have on your Aboriginal or treaty rights. We will forward the Environmental Report for the Project for review and comment once it is available and would be pleased to participate in further meetings to discuss and address any questions or concerns. As part of Enbridge Gas' engagement on the Project, Indigenous communities will have the opportunity to participate in fieldwork and Enbridge Gas will reach out in the future with further details.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the Project, and to allow for meaningful consultation. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your team's engagement in relation to the Project.

Enbridge Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor, Indigenous Energy Policy
chloe.lazakis@ontario.ca

Indigenous engagement will play a key role in the project. As noted in the attached Notice of Study Commencement and Virtual Public Information Session, the project team is hosting a Virtual Public Information Session at <https://www.waubunowelldrilling.ca/> from **Thursday, August 29 to Friday, September 6, 2024**. Enbridge Gas looks forward to engaging with your community to ensure your community's interests are being properly understood and considered. The project team would like to invite your community to participate in the upcoming Virtual Public Information Session and provide comments regarding the proposed project. Specifically, Enbridge Gas would appreciate your input on any potential impacts that the project may have on Oneida Nation of the Thames, including any Aboriginal and Treaty Rights, and any measures to mitigate those potential adverse impacts.

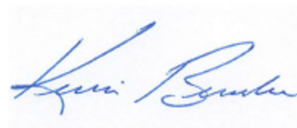
Kindly indicate whether your community is interested in participating in the engagement activities on or before **Monday, September 23, 2024**. If you are unable to respond by the above date and are intending to do so, please provide an alternative date for when the project team may expect a response.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the project, and to allow for meaningful engagement. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your community's engagement in relation to this project.

Enbridge Gas would be interested in meeting with Oneida Nation of the Thames to share project-related information and discuss any comments or concerns you may have. If you wish to meet, please provide potential dates and times that would work best for a meeting with your community representatives. Alternatively, please advise if you do not wish to meet but would prefer to be kept informed of the project.

On behalf of the project team, thank you in advance for your consideration regarding the initial phases of the project. Please do not hesitate to contact me with any questions you may have.

Sincerely,



Kevin Berube
Senior Advisor, Community & Indigenous Engagement,
Public Affairs, Communications & Sustainability
Enbridge Gas Inc.
Cell: 416 666 6759
kevin.berube@enbridge.com

Attachment: Notice of Study Commencement and Virtual Public Information Session

Proposed 2025 Waubuno Well Drilling Project
Notice of Study Commencement and Virtual Public Information Session
TOWNSHIP OF ST. CLAIR (LAMBTON COUNTY), ONTARIO
ENBRIDGE GAS INC.

The Study

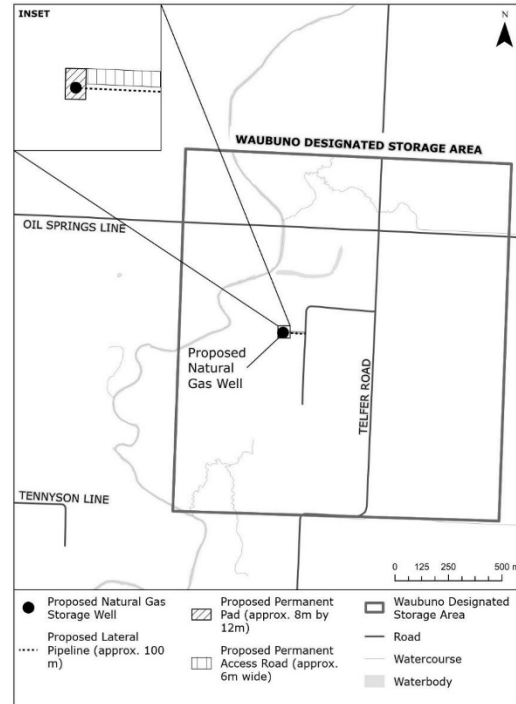
Enbridge Gas has retained Dillon Consulting to undertake an environmental study for the proposed 2025 Waubuno Well Drilling Project in Lambton County, Ontario.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 metres of 8-inch natural gas pipeline in the Waubuno Designated Storage Area (DSA) – an area of land designated by the Ontario Energy Board (OEB) under section 36.1(1)(a) of the *OEB Act*, which contains geological formations suitable for the storage of natural gas underground.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair. Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The Process

The study is being conducted in accordance with the *OEB's Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023)*. The study will review the need and justification for the project, describe the existing natural, cultural and socio-economic environment, evaluate the project from a natural, cultural, and socio-economic perspective, outline safety measures, and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.



Invitation to the Community

Stakeholder and Indigenous consultation is a key component of this study. Members of the general public, landowners, government agencies, Indigenous communities, and other interested parties are invited to participate in the study. We are hosting a Virtual Public Information Session to provide you with an opportunity to review the project and provide input.

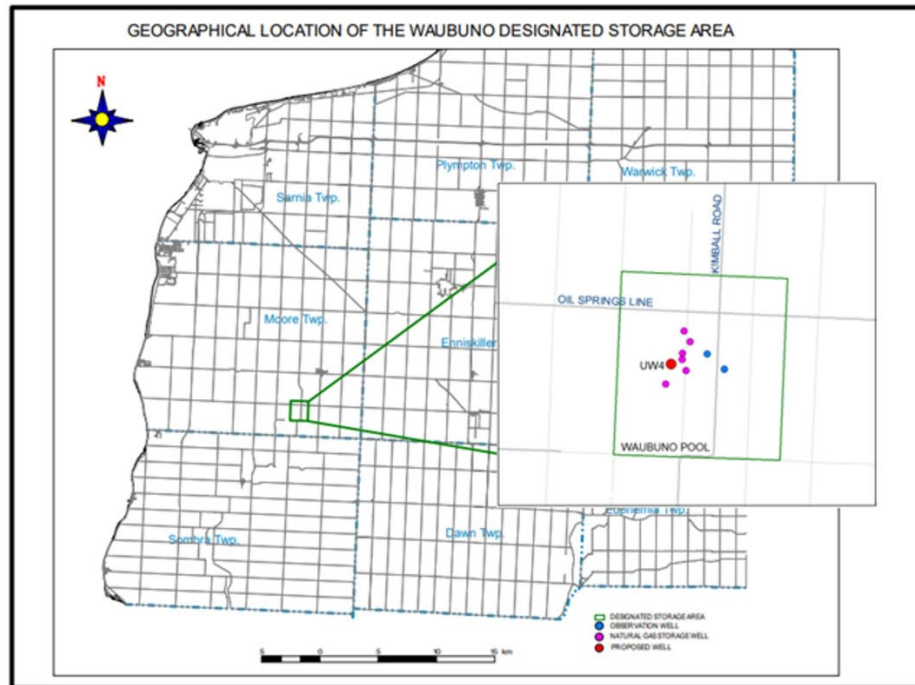
To access the Virtual Public Information Session, visit: www.WaubunoWellDrilling.ca from **Thursday, August 29, 2024 to Friday, September 6, 2024**.

If you are interested in participating or would like to provide comments, please visit the Virtual Public Information Session or contact one of the individuals listed below through the project email. The last day to submit comments for consideration in the draft environmental study is **September 23, 2024**. You can also visit the **Enbridge Gas Project Website** at www.enbridgegas.com/2025WellProject.

Project Contacts
Bill Olds
 Project Manager
 Dillon Consulting Limited

Project Email:
 2025Waubunowellproject@dillon.ca
Telephone: 905-905-5521





Line-item attachment 4.8

From: Bear <bearjohn55@hotmail.com>

Sent: September 27, 2024 8:31 AM

To: Liam Browne <lbrowne@tmhc.ca>

Cc: lutahawit@execulink.com; environment@oneida.on.ca; Matthew Beaudoin <mbeaudoin@tmhc.ca>; Donnelly, Jennifer <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Olds, Bill <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com

Subject: Re: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Liam,

I'll be available for this project, thanks for the update.

Have a good day,

Bear

Line-item attachment 4.11

From: [Lauren Whitwham](#)
To: [Brandon Doxtator](#)
Cc: [Kevin Berube](#)
Subject: 2025 Waubuno Project Final ER
Date: Monday, October 7, 2024 4:53:44 PM

Hi there,

I am reaching out, on behalf of Kevin who is on travelling for work today. Enbridge Gas wanted to let you know that the Environmental Report (ER) for the 2025 Waubuno Well Drilling Project is now available for review.

Enbridge Gas is proposing to drill one new natural gas storage well and construct 100 m of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA), in the township of St. Clair, Ontario.

With a favourable report from the Ontario Energy Board (OEB) to the Minister of Natural Resources, pursuant to Section 40(1) of the OEB Act, drilling of the well and construction of the pipeline are anticipated to begin in spring of 2025.

In accordance with the OEB's Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition (2023), Enbridge Gas is submitting the ER for the Project for OPCC review. Enbridge Gas has retained Dillon Consulting Limited, an independent environmental consultant, to complete the ER for the proposed project.

The ER can be found at the following link using the provided credentials:

URL: <https://dl.dillon.ca/index.php/login>

Username: Enbridge_Public

Password: HhEXiE2789ns

We are requesting feedback by **November 18, 2024**.

Capacity funding is available to enable you to engage in timely technical reviews of documents, participation in field work associated with proposed projects, and to engage in meaningful consultation. If you could provide Kevin with a quote or proposal, that would be greatly appreciated.

If you require any further information at this time, please do not hesitate to contact Kevin.

Thanks,
Lauren

Line-item attachment 5.0



Waubuno Notification - May 2024 - WIFN.pdf
168 KB



Map.pdf
204 KB

From: Chasity Pilecki <Chasity.Pilecki@enbridge.com>
Sent: Tuesday, May 21, 2024 4:06 PM
To: alicia.blackeagle@wifn.org
Subject: Early Notification: 2025 Waubuno Well Drilling Project

Good afternoon,

This email is to notify you of a planned upcoming project. The project does not trigger an LTC, however I am engaging based on Enbridge's Lifecycle Engagement protocols and keeping you informed of our work in the area.

Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

Enbridge Gas has reached out to the Ministry of Energy for delegation of the Duty to Consult and we expect to hear from them in the next couple of weeks.

There will also be upcoming Stage 2 Archaeology fieldwork and TMHC will be reaching out for monitoring opportunities.

Please see the attached letter to learn more.

Kindest regards,

Chasity Pilecki (she/her)
Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Drive North, Chatham ON, N7M 5M1
enbridge.com
Safety. Integrity. Respect. Inclusion. High Performance



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

May 21, 2024

Walpole Island First Nation
117 Tahgahoning Road
Walpole Island, ON N8A 4K9

Dear Recipient,

Enbridge Gas – Notice of Upcoming Project for the 2025 Waubuno Well Drilling Project

This letter is to notify you of a proposed upcoming project in your area.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100m of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA). The DSA is located in the County of Lambton within St. Clair Township, near the intersection of Oil Spring Line and Telfer Road. A map of the proposed well location and DSA is attached.

The drilling of well is needed to replace the deliverability lost in the Waubuno Storage Pool due to well relines and abandonments.

The 2025 Waubano Well Drilling Project is proposed to be undertaken pending a positive recommendation from the Ontario Energy Board (OEB) to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the OEB Act.

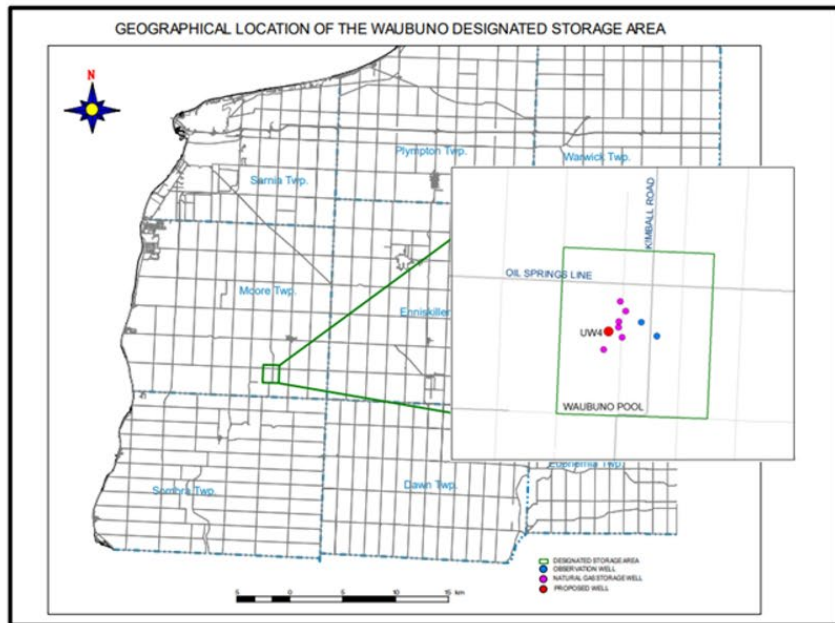
In support of this upcoming OEB application, Enbridge Gas will be undertaking environmental studies in 2024 to review the proposed construction and operation of the project. The environmental studies will include a consultation program, impact assessment, and a cumulative effects assessment.

Enbridge Gas is committed to undertaking consultation with Indigenous Communities and local stakeholders as an integral component of the planning process. Additional details regarding the project and how to become involved during public consultation will be provided in future correspondence. If you have any questions or comments during the development stages of this project, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community and Indigenous Engagement
Enbridge Gas
Chasity.Pilecki@enbridge.com
226-229-1012



Line-item attachment 5.1

From: Liam Browne
Sent: May 24, 2024 9:17 AM
To: alicia.black eagle@wfn.org
Cc: Matthew Beaudoin <mbeaudoin@tmhc.ca>; Jennifer Donnelly <jdonnelly@dillon.ca>; Ginter, Kayla <kginter@dillon.ca>; Bill Olds <bolds@dillon.ca>; Chasity.Pilecki@enbridge.com
Subject: Stage 1-2 Archaeological Assessment for Enbridge's Waubuno Well Drilling Project

Hi Alica,

TMHC has been contacted through Dillon Consulting Limited to complete a Stage 1-2 archaeological assessment for Enbridge Gas Inc.'s Waubuno Well Drilling Project in the Township of St. Clair, Lambton County. The project area is roughly 7 acres in size (see attached Fieldmap - <https://maps.app.goo.gl/GfbPD6yAyHuSxycW7>).

At this point, there are no archaeological sites registered within 1 km of the project area. The project area is located on level ground above the valley associated with Bear Creek. As the project area is located within an active agricultural field, it will be assessed via pedestrian survey. We are anticipating completing this work on June 7. Would Walpole Island First Nation like to be involved in this fieldwork?

If you have any questions about the specifics of Enbridge's project please let us know. If there are any questions regarding the archaeological assessment I would be happy to discuss further. Contracts for this project will be signed by Enbridge (Chasity.Pilecki@enbridge.com).

Best,
Liam

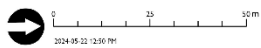
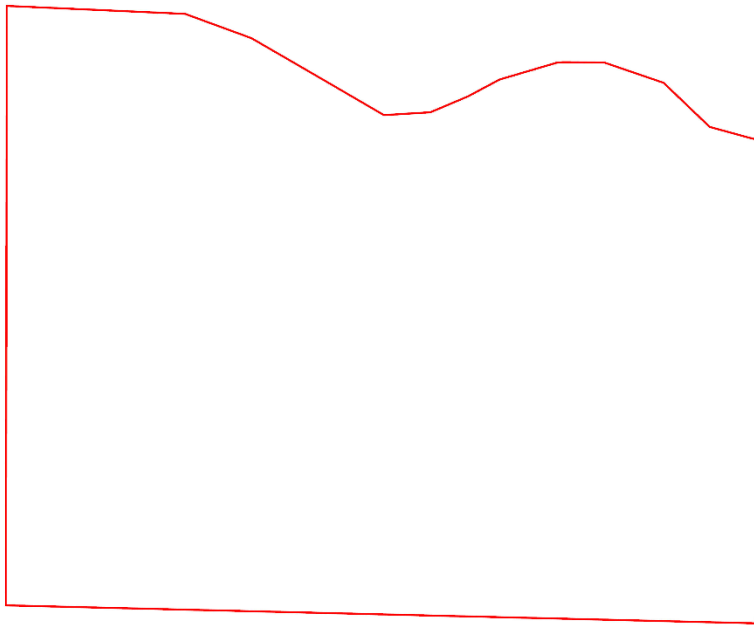


Liam Browne, MA, P1048
Pipeline Archaeological Projects Unit Manager
lbrowne@tmhc.ca
519-282-0095

TMHC Inc.
1108 Dundas Street, Unit 105
London, ON | N5W 3A7
www.tmhc.ca
519-641-7222

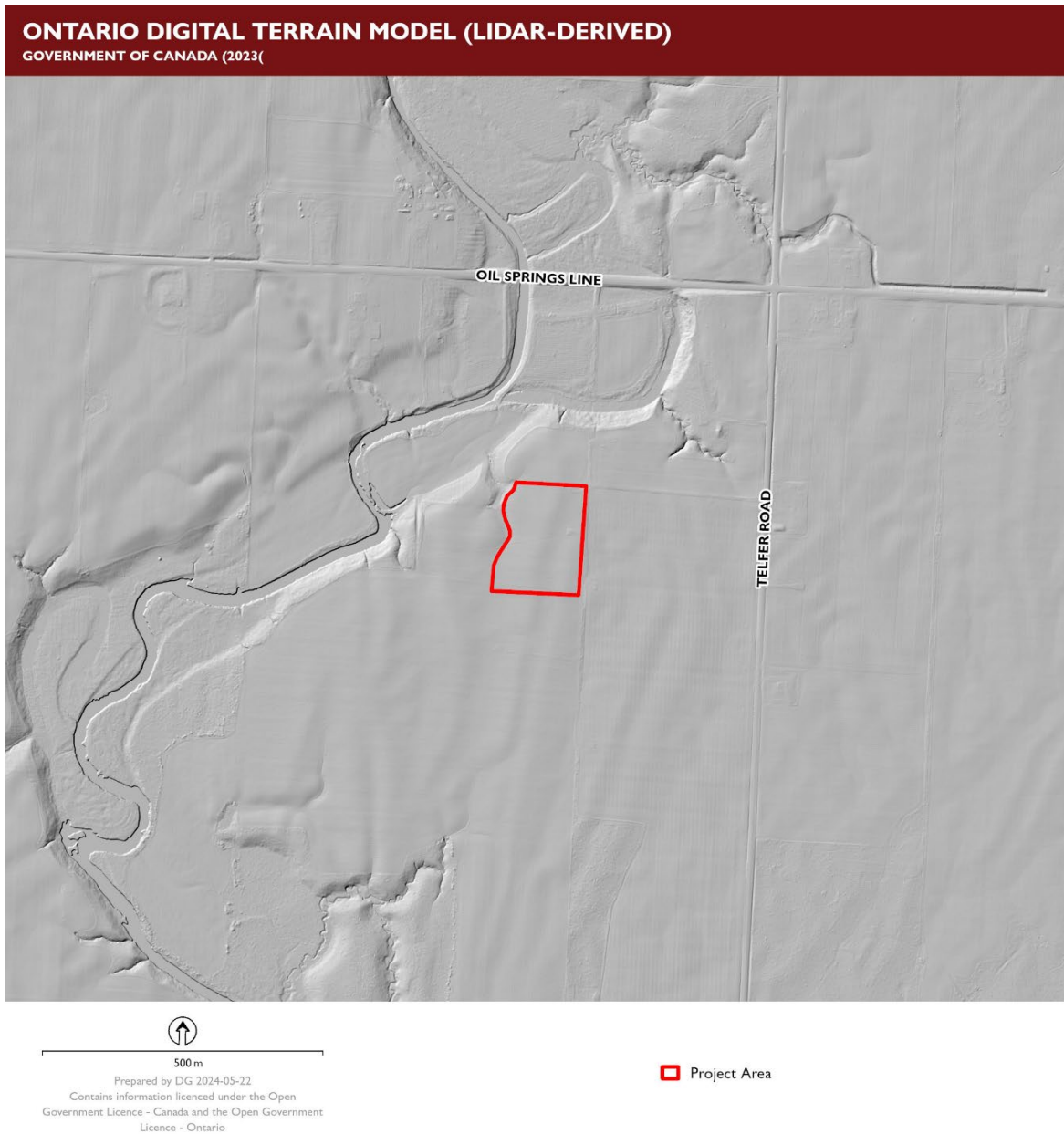
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2024-141 D-E Waubuno Well Drill, St. 1-2



PROJECT LOCATION





Line-item attachment 5.6

From: [Chasity Pilecki](#)
To: alicia.blackeagle@wifn.org
Subject: Enbridge Gas: Proposed 2025 Waubuno Well Drilling Project, Notification
Date: Monday, August 19, 2024 3:09:13 PM
Attachments: [WIFN 2025 Waubuno Well Drilling Notification Letter.pdf](#)
[2025 Waubuno Well Drilling Project NoSCletter WIFN.pdf](#)
[Map.pdf](#)
[248218_2025WellDrilling_Ad_final.pdf](#)
[image001.png](#)

Good afternoon Alicia,

Please find attached the Proposed 2025 Waubuno Well Drilling Project notification, along with the invitation to the Virtual Information Session and map.

If you have any questions, please do not hesitate to contact me.

Kindest regards,

Chasity Pilecki (she/her)
Advisor, Community & Indigenous Engagement
Public Affairs, Communications & Sustainability



CELL: 226-229-1012 | chasity.pilecki@enbridge.com
50 Keil Dive North, Chatham ON, N7M 5M1
enbridge.com
Safety. Integrity. Respect. Inclusion. High Performance



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

Via email

August 19, 2024

Alicia Blackeagle
Walpole Island First Nation
117 Tahgahoning Road
Walpole Island, ON
N8A 4K9

Project Notification re: Enbridge Gas Inc.'s Proposed 2025 Waubuno Well Drilling Project

Dear Alicia,

Enbridge Gas Inc. (Enbridge Gas) is proposing the 2025 Waubuno Well Drilling Project and has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of Nominal Pipe Size ("NPS") 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers. For further details, please refer to the attached Figure 1 and the shape file provided. The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

The Project does not cross any Crown land and includes the following property types: private property. Enbridge Gas anticipates that a permanent easement will be required for the Project.

It is expected that the majority of adverse environmental and socio-economic effects will be construction related. These effects are expected to be temporary and transitory. The Project will be underground once construction is complete, further limiting the potential for any long-term effects. Temporary working space and laydown areas may also be required to facilitate the movement and storage of equipment necessary for construction. Enbridge Gas will work with regulators and landowners to identify and secure appropriate working space as required.

As part of the planning process for the Project, Enbridge Gas has retained an external consulting firm to undertake an environmental study of the construction and operation of the Project. The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the*

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.



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

Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition (2023).

Enbridge Gas' preliminary work on the Project has identified the following potential authorizations:

Federal:

- N/A

Provincial:

- Ministry of Citizenship and Multiculturalism – Archaeological Assessment and Cultural Heritage Assessment.
- Ministry of the Environment, Conservation and Parks – 1. Permit to Take Water or Environmental Activity and Sector Registry 2. Endangered Species Act permits.
- St. Clair Region Conservation Authority

Municipal:

- Township of St. Clair
- County of Lambton

Other:

- N/A

Other authorizations, notifications, permits, and/or approvals may be required in addition to those identified above.

We would like to consult with your community on the proposed Project. We are interested in your community's feedback, whether in writing or through a face-to-face meeting, relating to, among other things:

- Any information the community has available that Enbridge Gas should consider when preparing documentation related to the Project;
- Any information the community may have regarding the potential adverse impacts the Project may have on your Aboriginal or treaty rights.
- Any suggestions or proposals on avoiding, minimizing or mitigating any potential adverse impacts.
- Guidance on how you would like information provided to us to be collected, stored, used and shared.

While Enbridge Gas is interested in meeting at any time during the Project development process, we would appreciate the opportunity to meet early to discuss the preliminary preferred and alternative routing identified above, any concerns the community may have with those routes and any potential adverse impacts the Project may have on your Aboriginal or treaty rights. We will forward the Environmental



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

Report for the Project for review and comment once it is available and would be pleased to participate in further meetings to discuss and address any questions or concerns. As part of Enbridge Gas' engagement on the Project, Indigenous communities will have the opportunity to participate in fieldwork and Enbridge Gas will reach out in the future with further details.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the Project, and to allow for meaningful consultation. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your team's engagement in relation to the Project.

Enbridge Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor, Indigenous Energy Policy
chloe.lazakis@ontario.ca

Please feel free to contact me at chacity.pilecki@enbridge.com or 226-229-1012 so we can set up a time to meet. You may also provide me with any feedback you may have regarding the Project in writing by September 23, 2024, if possible.

Kindest regards,

A handwritten signature in black ink, appearing to read 'Chasity Pilecki'.

Chasity Pilecki
Advisor, Community & Indigenous Engagement, Eastern Region
Enbridge Gas Inc.
226-229-1012
chacity.pilecki@enbridge.com



Enbridge Gas
50 Keil Drive North
Chatham, Ontario N7M 5M1
Canada

August 19, 2024

**To: Alicia Blackeagle
Bkejwanong (Walpole Island First Nation)**

**Re: Enbridge Gas Inc.
Proposed 2025 Waubuno Well Drilling Project
Township of St. Clair (Lambton County), Ontario
Notice of Study Commencement and Virtual Public Information Session**

Dear Alicia,

I am reaching out to provide your community with the attached Notice of Study Commencement and Virtual Public Information Session for the proposed 2025 Waubuno Well Drilling Project in Lambton County.

Enbridge Gas Inc. (Enbridge Gas) has retained Dillon Consulting Limited (Dillon) to undertake an environmental study for the project. The proposed project will involve the drilling of one new natural gas storage well and installation of approximately 100 metres of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA)¹. The proposed well and pipeline constructed for this project is required to ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair.

Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The study is being conducted in accordance with the Ontario Energy Board's (OEB's) *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural, and socio-economic environment, evaluate the project from a natural, cultural and socio-economic environmental perspective, outline safety measures and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of a well drilling licence under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.

As part of the initial phase of the study, we are collecting information on cultural, socio-economic, natural environment, at the proposed well sites. Examples of data being collected include information on

¹ Area of land designated by the Ontario Energy Board under section 36.1(1)(a) of the *Ontario Energy Board Act*, which contains geological formations suitable for the storage of natural gas underground.

archaeological and heritage resources, terrestrial and aquatic vegetation and wildlife, groundwater, surface water, soils, geology, existing infrastructure, and human occupancy and resource use in the area.

Indigenous engagement will play a key role in the project. As noted in the attached Notice of Study Commencement and Virtual Public Information Session, the project team is hosting a Virtual Public Information Session at <https://www.waubunowelldrilling.ca/> from **Thursday, August 29 to Friday, September 6, 2024**. Enbridge Gas looks forward to engaging with your community to ensure your community's interests are being properly understood and considered. The project team would like to invite your community to participate in the upcoming Virtual Public Information Session and provide comments regarding the proposed project. Specifically, Enbridge Gas would appreciate your input on any potential impacts that the project may have on Walpole Island First Nation, including any Aboriginal and Treaty Rights, and any measures to mitigate those potential adverse impacts.

Kindly indicate whether your community is interested in participating in the engagement activities on or before **Monday, September 23, 2024**. If you are unable to respond by the above date and are intending to do so, please provide an alternative date for when the project team may expect a response.

Enbridge Gas acknowledges that capacity support may be required to enable you to engage in timely technical reviews of documents, participation in field work associated with the project, and to allow for meaningful engagement. Consistent with our approach on all projects, we are prepared to provide capacity funding to support your community's engagement in relation to this project.

Enbridge Gas would be interested in meeting with Walpole Island First Nation to share project-related information and discuss any comments or concerns you may have. If you wish to meet, please provide potential dates and times that would work best for a meeting with your community representatives. Alternatively, please advise if you do not wish to meet but would prefer to be kept informed of the project.

On behalf of the project team, thank you in advance for your consideration regarding the initial phases of the project. Please do not hesitate to contact me with any questions you may have.

Sincerely,

Chasity Pilecki
Advisor, Community & Indigenous Engagement,
Public Affairs, Communications & Sustainability
Enbridge Gas Inc.
Cell: 226-229-1012
Chasity.Pilecki@enbridge.com

Attachment: Notice of Study Commencement and Virtual Public Information Session

Proposed 2025 Waubuno Well Drilling Project
Notice of Study Commencement and Virtual Public Information Session
 TOWNSHIP OF ST. CLAIR (LAMBTON COUNTY), ONTARIO
 ENBRIDGE GAS INC.

The Study

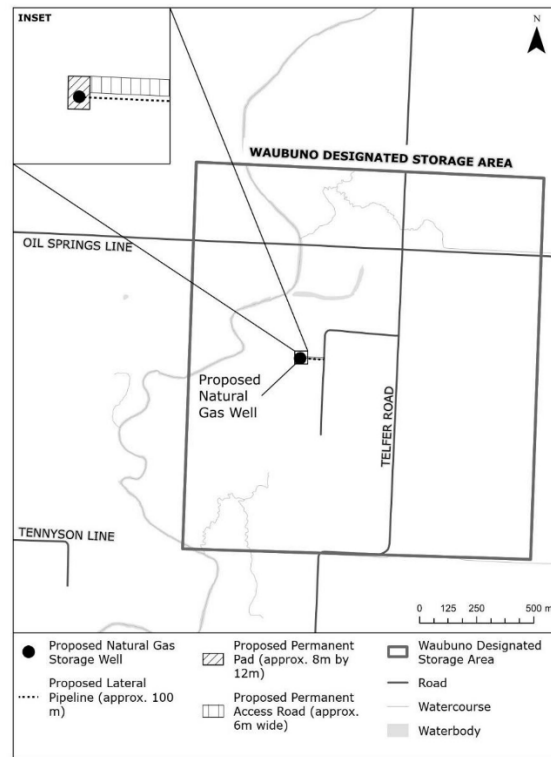
Enbridge Gas has retained Dillon Consulting to undertake an environmental study for the proposed 2025 Waubuno Well Drilling Project in Lambton County, Ontario.

To ensure the continued safe and reliable delivery of natural gas to existing and future Enbridge Gas customers, Enbridge Gas is proposing to drill one new natural gas storage well and install approximately 100 metres of 8-inch natural gas pipeline in the Waubuno Designated Storage Area (DSA) – an area of land designated by the Ontario Energy Board (OEB) under section 36.1(1)(a) of the *OEB Act*, which contains geological formations suitable for the storage of natural gas underground.

The proposed well and pipeline location is approximately 650 metres southwest of the intersection of Telfer Road and Oil Springs Line in the Township of St. Clair. Project activities will commence with the construction of a temporary gravel drilling pad measuring up to 60 metres by 100 metres. Upon completion of drilling activities, a permanent gravel pad measuring 8 metres by 12 metres will be installed around the well and the new natural gas pipeline will be installed.

The Process

The study is being conducted in accordance with the *OEB's Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th edition* (2023). The study will review the need and justification for the project, describe the existing natural, cultural and socio-economic environment, evaluate the project from a natural, cultural, and socio-economic perspective, outline safety measures, and provide appropriate measures for impact mitigation and monitoring. Pending a positive recommendation from the OEB to the Minister of Natural Resources for the issuance of well drilling licences under section 40 of the *OEB Act*, construction is planned to begin as early as spring 2025.



Invitation to the Community

Stakeholder and Indigenous consultation is a key component of this study. Members of the general public, landowners, government agencies, Indigenous communities, and other interested parties are invited to participate in the study. We are hosting a Virtual Public Information Session to provide you with an opportunity to review the project and provide input.

To access the Virtual Public Information Session, visit: www.WaubunoWellDrilling.ca from **Thursday, August 29, 2024 to Friday, September 6, 2024**.

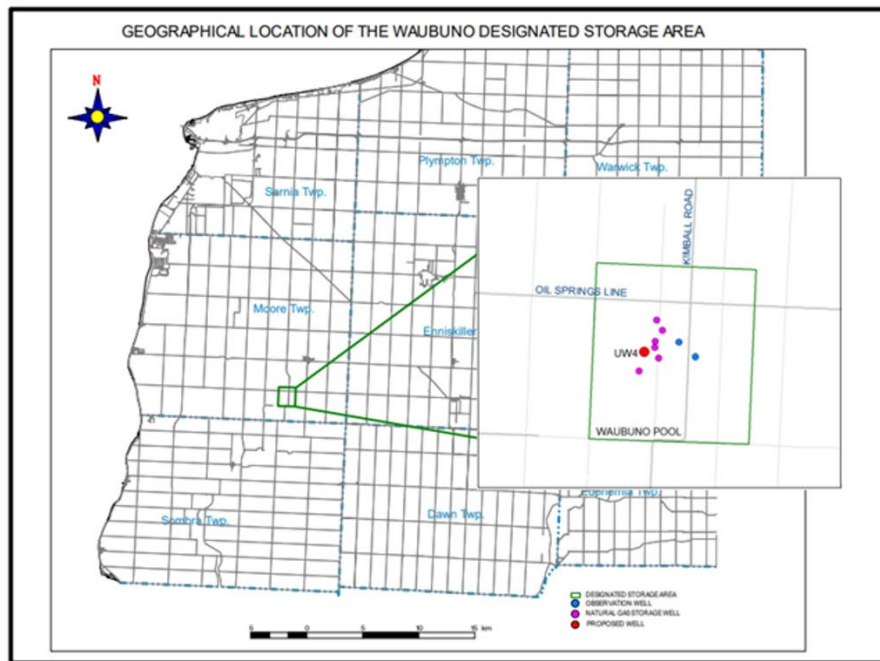
If you are interested in participating or would like to provide comments, please visit the Virtual Public Information Session or contact one of the individuals listed below through the project email. The last day to submit comments for consideration in the draft environmental study is **September 23, 2024**. You can also visit the **Enbridge Gas Project Website** at www.enbridgegas.com/2025WellProject.

**Project
Contacts**

Bill Olds
 Project Manager
 Dillon Consulting Limited

Project Email:
 2025waibunowellproject@dillon.ca
Telephone: 905-905-5521





Line-item attachment 5.10

From: [Lauren Whitwham](#)
To: [Alicia Blackeagle](#)
Cc: [Chasity Pilecki](#)
Subject: 2025 Waubuno Project Final ER
Date: Monday, October 7, 2024 4:48:24 PM

Hi there,

I am reaching out, on behalf of Chasity who is on vacation. Enbridge Gas wanted to let you know that the Environmental Report (ER) for the 2025 Waubuno Well Drilling Project is now available for review.

Enbridge Gas is proposing to drill one new natural gas storage well and construct 100 m of 8-inch lateral natural gas pipeline in the Waubuno Designated Storage Area (DSA), in the township of St. Clair, Ontario.

With a favourable report from the Ontario Energy Board (OEB) to the Minister of Natural Resources, pursuant to Section 40(1) of the OEB Act, drilling of the well and construction of the pipeline are anticipated to begin in spring of 2025.

In accordance with the OEB's Guidelines for the Location, Construction, and Operation of Hydrocarbon Projects and Facilities in Ontario, 8th Edition (2023), Enbridge Gas is submitting the ER for the Project for OPCC review. Enbridge Gas has retained Dillon Consulting Limited, an independent environmental consultant, to complete the ER for the proposed project.

The ER can be found at the following link using the provided credentials:

URL: <https://dl.dillon.ca/index.php/login>

Username: Enbridge_Public

Password: HhEXiE2789ns

We are requesting feedback by **November 18, 2024**.

Capacity funding is available to enable you to engage in timely technical reviews of documents, participation in field work associated with proposed projects, and to engage in meaningful consultation. If you could provide Chasity with a quote or proposal, that would be greatly appreciated.

If you require any further information at this time, please do not hesitate to contact Chasity.

Thanks,
Lauren

ENBRIDGE GAS INC.

Answer to Interrogatory from
OEB Staff ("STAFF")

Interrogatory

Reference:

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(s):

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

Response:

- a) Enbridge Gas has no objections to the draft conditions of licence proposed by OEB staff.

Enbridge Gas also notes that the OEB references the Ministry of Natural Resources and Forestry. Enbridge Gas confirms that the Ministry of Natural Resources is the correct reference.