



BY EMAIL

May 8, 2025

James Fitzpatrick
Manager, Petroleum Operations
Ministry of Natural Resources
659 Exeter Road
London ON N6E 1L3
James.Fitzpatrick@ontario.ca

Dear James Fitzpatrick:

**Re: Report to the Minister of Natural Resources
Well Drilling License Application
Waubuno Well Drilling Project
OEB File Number: EB-2024-0304**

Pursuant to Section 40 of the *Ontario Energy Board Act, 1998*, the Minister of Natural Resources referred to the Ontario Energy Board (OEB) an application by Enbridge Gas Inc. (Enbridge Gas) for a well drilling licence to drill a natural gas storage well in the Waubuno Storage Pool. Please find attached the OEB's report to the Minister of Natural Resources that recommends the issuance of a well drilling licence to Enbridge Gas for the well, subject to certain Conditions of Licence.

Please direct any questions relating to this application to Zora Crnojacki, Senior Advisor at Zora.Crnojacki@oeb.ca or at 416-440-8104.

Yours truly,

Nancy Marconi
Registrar

c: Evan Tomek, Evan.Tomek@enbridge.com
Henry Ren, Henry.Ren@enbridge.com
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REPORT OF THE ONTARIO ENERGY BOARD TO THE MINISTER OF NATURAL RESOURCES

**Application by Enbridge Gas Inc. for a licence to drill a
natural gas storage well in the Waubuno Storage Pool in the
Township of St. Clair**

By Delegation, before: **Theodore Antonopoulos**
Vice President
Major Applications

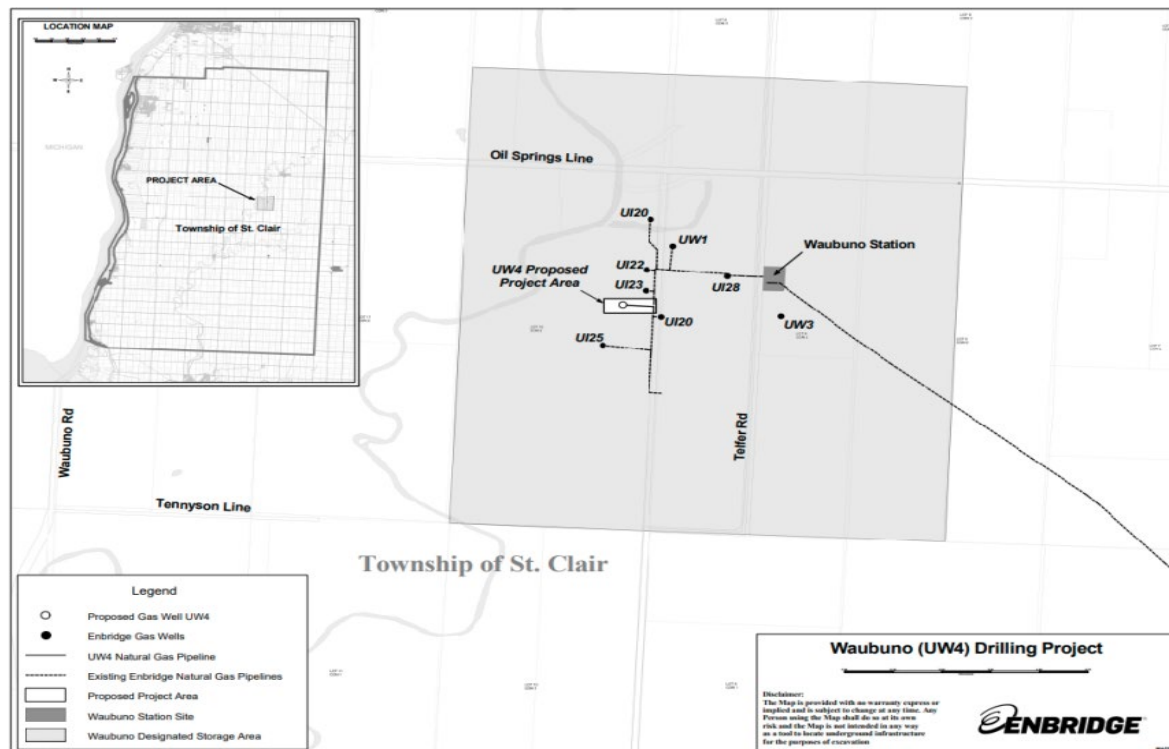
May 8, 2025

1 INTRODUCTION AND SUMMARY

Enbridge Gas Inc. (Enbridge Gas) applied to the Minister of Natural Resources¹ (Minister) for a licence to drill a new injection/withdrawal well (Union Waubuno #4, Moore 4-10-II) (Well UW4). The well will be drilled within the Designated Storage Area² in the Waubuno Storage Pool (the well is referred to as the Project). Enbridge Gas is authorized to store gas in the Waubuno Storage Pool.³

On October 21, 2024, the Minister referred the application to the Ontario Energy Board (OEB) pursuant to section 40(1) of the *Ontario Energy Board Act, 1998* (OEB Act).

On December 10, 2024, Enbridge Gas requested from the OEB a favourable report (Report) to the Minister in respect of the Well UW4 well drilling licence application. The locations of the Waubuno Storage Pool and the Project are presented in the diagram below:⁴



¹ Minister of Northern Development, Mines, Natural Resources and Forestry

² Application and Evidence, Exhibit A, Tab 2, Schedule 1 page 2, paragraph 5. The Waubuno Storage Pool was designated as a gas storage area pursuant to Ontario Regulation 199/54 and as amended by Ontario Regulations 49/55 and 287/69.

³ Granted by the Ontario Fuel Board Order 35

⁴ Exhibit A, Tab 1, Schedule 1, page 1

The OEB recommends approval of the application for the well drilling licence. The OEB's recommendation includes the Conditions of Licence in Attachment A to this Report.

2 PROCESS

Section 40(2) of the OEB Act states that the "Board may hold a hearing before reporting to the Minister if the applicant does not have authority to store gas in the area or, in the Board's opinion, the special circumstances of the case require a hearing."

On February 10, 2025, the OEB issued a Case Information Letter (Letter). The Letter set out a process for OEB staff questions and comments from the Ministry of Natural Resources (MNR). As Enbridge Gas has the authority to store gas in the Waubuno Storage Pool and there are no special circumstances that require a hearing, the Letter stated that the OEB will review the application and issue the Report without holding a hearing.

OEB staff filed questions on February 18, 2025. Enbridge Gas responded on February 28, 2025. OEB staff filed follow-up questions on March 6, 2025 and Enbridge Gas responded on March 10, 2025. The MNR received Enbridge Gas's responses to the questions.

Enbridge Gas provided the Ministry of Energy and Mines (MEM) with its Indigenous Consultation Report (ICR) for the Project on February 25, 2025 and an updated ICR on March 6, 2025.⁵

On March 24, 2025, the MNR filed its Written Submission with respect to the application. On April 24, 2025, Enbridge Gas updated its evidence by filing the Letter of Opinion from the MEM confirming that the procedural aspects of Indigenous consultation undertaken by Enbridge Gas to date for the Project are satisfactory. This closed the record for the proceeding.

3 FACTORS CONSIDERED BY THE OEB

When reviewing and reporting to the Minister on well drilling licence applications, the OEB considers the following factors:

- Project need, regulatory compliance and timing
- Proposed facilities

⁵ Enbridge Gas Responses to OEB's follow up questions 1 and 2

- Project costs and impact on ratepayers
- Environmental impacts of the project
- Landowner matters associated with the project
- Indigenous consultation associated with the project
- Conditions of Licence

The sections below summarize the evidence filed by Enbridge Gas and provide the OEB's findings related to each of these factors.

3.1 PROJECT NEED, REGULATORY COMPLIANCE AND TIMING

Need for the Project

Enbridge Gas stated that Well UW4 is needed to replace the withdrawal capability that would be lost through the planned abandonment of Well UI20, the previous relining of four wells (UI25, UI20, UI22, UM20), and the 2016 abandonment of one well (UI30) in the Waubuno Storage Pool. The timing and status of works on the wells that resulted in a loss of withdrawal capability and cycling time of the Waubuno Storage Pool is shown in the table below.

Table 1: Abandoned and Relined Wells in the Waubuno Storage Pool⁶

Well	Year Drilled	Year Relined	Initial Casing Size (mm)	New Casing Size (mm)	Year Abandoned
UI25	1954	2003	177.8	114.3	N/A
UI20	1951	2003	139.7	88.9	Planned 2025
UI22	1953	2009	177.8	139.7	N/A
UM20	1959	2016	177.8	139.7	N/A
UI30	1954	N/A			2016

According to Enbridge Gas, the well relinings and abandonments address integrity concerns which resulted in increased operating risk. Enbridge Gas stated that relining a well with a smaller diameter casing extends the life of the well and resolves the integrity concerns; however, it reduces the well's withdrawal capability.

The previous relining of Wells UI25, UI20, UI22, and UM20 and abandonment of Well UI30 resulted in a total design day withdrawal capability loss of approximately 31

⁶ Exhibit B, Tab 1, Schedule 1, paragraph 8, page 3

10³m³/day. The planned 2025 abandonment of Well UI20 will further reduce total design day withdrawal capability by an additional 31 10³m³/day to a total reduction of approximately 62 10³m³/day in the Waubuno Storage Pool. Enbridge Gas estimates that Well UW4 will re-compensate withdrawal capability by approximately 51 10³m³/day.

Enbridge Gas also noted that the well relines and abandonments increase the number of days required to cycle the Waubuno Storage Pool by two weeks.

Enbridge Gas stated that the loss of withdrawal and loss of cycling capabilities restrict Enbridge Gas's ability to fulfill the storage requirements for both regulated and unregulated storage operations.⁷

According to Enbridge Gas, the drilling of Well UW4 will not result in an increase in storage space capacity and the maximum operating pressure of the Waubuno Storage Pool. The Project will have no impact on Enbridge Gas's Utility System Plan and Gas Supply Plan and will not result in any new storage services.

Findings

The OEB finds that Enbridge Gas's evidence supports the need for the Project. The Project would enable Enbridge Gas to compensate for the lost withdrawal capability and cycling ability of the Waubuno Storage Pool due to previous relines of four wells, one previous well abandonment, and one planned well abandonment.

Regulatory Compliance

Enbridge Gas stated that all design, drilling, installation and testing of the proposed well will be in accordance with the *Oil, Gas & Salt Resources Act* (OGSRA), Ontario Regulation 245/97, OGSRA Standards v.3.0 and the Canadian Standards Association standard *Z341 Storage of Hydrocarbons in Underground Formations* (CSA Z341.1-22).

⁸

Enbridge Gas filed the summaries of the following studies with the MNR for review and assessment of compliance with CSA Z341.1-22:

- A Neighbouring Assessment for the Waubuno Storage Pool

⁷ Enbridge Gas stated that the 2025-2034 Asset Management Plan (EB-2020-0091) describes the requirement and plan to drill two wells to replace the lost withdrawal capability in the Waubuno Storage Pool. However, Enbridge Gas noted that after iterative review it established that well UW4 will provide sufficient withdrawal capability to restore flexibility in filling and emptying the Waubuno Storage Pool.

⁸ Application and Evidence, Exhibit D, Tab 1, Schedule 1, Paragraph 2, Page 1

- A Risk Assessment (“What if” analysis of hazards and operability issues)

Enbridge Gas’s evidence included copies of its communication with the MNR regarding the studies. The MNR acknowledged the receipt of the summaries for the studies. In its written submission,⁹ the MNR stated that the MNR Petroleum Operations Section has reviewed Enbridge Gas’s application, OEB staff’s questions (including the proposed conditions of approval) and Enbridge Gas’s responses to all the questions and stated that it is satisfied with Enbridge Gas’s response to all questions.

Enbridge Gas confirmed that it will fulfill, to the satisfaction of the MNR, all relevant requirements of CSA Z341.1-22, the OGSRA and related regulations.

Findings

The OEB accepts the statement by Enbridge Gas that all drilling, design, installation and testing of the proposed Well UW4 will be in accordance with applicable regulations and that compliance will be to the satisfaction of the MNR.

Regarding the regulatory requirements for the well drilling licence, the OEB notes that Enbridge Gas¹⁰ and the MNR¹¹ both agreed to the following condition of licence to drill Well UW4:¹²

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 (MNR)
- b) The requirements for wells as specified in the *Oil, Gas and Salt Resources Act*, its Regulation 245/97, and the Provincial Operating Standards v.2 to the satisfaction of the MNR.

Timing of the Project

In its application, Enbridge Gas stated that it planned to start drilling in April, 2025. Enbridge Gas plans to place Well UW4 into service in September 2025, when the pressure of the Waubuno Storage Pool is below 5,500 kPa. Enbridge Gas stated that timing the drilling to when the Waubuno Storage Pool is at a low pressure will ensure

⁹ MNR Written Submission, March 24, 2025, page 4

¹⁰ Enbridge Gas Response to OEB I.Staff-4

¹¹ MNR Written Submission, March 24, 2025, page 5

¹² See Attachment A to this report for full list of conditions

safety and that there will be no disruption to service from the Waubuno Storage Pool.¹³

In its application, Enbridge Gas stated that all activities related to drilling will occur on a drilling pad and laneway and the construction of the temporary all-weather drilling pad and permanent access road commenced in fall 2024 upon receipt of all required permits, approvals, and landowner agreements.

Findings

The OEB finds the proposed drilling schedule to be acceptable as it ensures the safe drilling of Well UW4 with no disruption to service in the Waubuno Storage Pool. As discussed below, the OEB only recently received a Letter of Opinion from the MEM regarding whether the procedural aspects of the Indigenous consultation undertaken by Enbridge Gas are satisfactory, after which this Report could be finalized. Given the date of this Report, if the proposed schedule or other aspects of the Project require material changes, Enbridge Gas is expected to notify the MNR and the OEB as soon as practicable. The OEB expects Enbridge Gas to explain any minor delays or deviations related to the drilling schedule or other components of the Project as part of its filing under recommended condition 9 of this Report.

3.2 PROPOSED FACILITIES AND REGULATORY COMPLIANCE

Proposed Facilities

The well drilling requires the construction of a gravel pad and a permanent access lane.

For Well UW4, Enbridge Gas must construct the following features:

- A gravel pad temporary work area of approximately 8,000 m² with a fence around the perimeter.
- A 5 m wide x 100 m long permanent access lane off an existing gravel road to allow access to the well site.

Enbridge Gas stated that once drilling is complete, an NPS 8-inch steel natural gas pipeline of approximately 100 m will be installed from Well UW4 to the existing Waubuno Storage Pool pipelines gathering system. According to Enbridge Gas, this natural gas pipeline does not meet any of the criteria for requesting leave to construct under the OEB Act.¹⁴ Upon completion of the pipeline installation, a permanent access laneway to the well site and a permanent well site measuring approximately 96 m² will

¹³ Exhibit D, Tab 1, Schedule 1, paragraph 15, page 5

¹⁴ *Ontario Energy Board Act, 1998*, s.90(1)

remain, the rest of the land will be restored, and any drainage tile issues caused by Enbridge Gas's operations will be resolved.

Findings

The OEB finds the construction of the proposed facilities to be appropriately planned.

3.3 PROJECT COSTS AND IMPACT ON RATEPAYERS

The total estimated cost for the Project is approximately \$3.8 million¹⁵, as outlined in Table 2, below¹⁶.

Table 2: Project Costs

<u>Type of Expenditure (\$)</u>	<u>Well UW4 – Drilling</u>
Material Costs	814,000
Labour Costs	124,300
External Permitting	11,000
Land	55,000
Contractors	2,706,000
Internal Labour	148,400
Total Costs	3,858,700

Enbridge Gas is not seeking cost recovery of the Project as part of this application. The costs for the Project have been included in Enbridge Gas's capital forecast supporting its 2024 Rebasing Phase 1 proceeding.¹⁷

The Waubuno Storage Pool is used by Enbridge Gas to fulfill part of its storage requirements for regulated and unregulated storage operations. Enbridge Gas stated that the capital costs for drilling Well UW4 will be allocated to regulated and unregulated storage operations in accordance with Enbridge Gas's harmonized storage allocation methodology as approved in the 2024 Enbridge Gas Rebasing Phase 2 proceeding¹⁸.

Findings

The OEB acknowledges that costs for the Project were included in Enbridge Gas's capital forecast supporting its 2024 Rebasing Phase 1 application. The ratemaking implications of the Project, including the appropriate allocation of costs, were addressed

¹⁵ The total cost of the Project includes a 10% contingency applied to all direct capital costs.

¹⁶ Exhibit E, Tab 1, Schedule 1, paragraph 1, page 1

¹⁷ EB-2022-0200 Rate Base Evidence and Summary Overview

¹⁸ EB-2024-0111 Decision on Settlement Proposal and Interim Rate Order, November 29, 2024

in its 2024 Rebasing Phase 2 proceeding

3.4 ENVIRONMENTAL IMPACTS

Enbridge Gas retained Dillon Consulting Ltd. to undertake an environmental screening to identify potential environmental and socio-economic impacts associated with the Project, in accordance with the *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Projects and Facilities in Ontario* (8th edition), 2023 (Environmental Guidelines). The results of the study are documented in the Environmental Report included in the application.¹⁹ The Environmental Report concluded that with the implementation of its recommendations, ongoing landowner communication, and adherence to permit and regulatory requirements, potential adverse residual environmental and socio-economic impacts of the Project are not anticipated to be significant.

The draft Environmental Report was shared with members of the Ontario Pipeline Coordinating Committee (OPCC), Indigenous communities, municipalities, and relevant agencies on October 7, 2024 and October 8, 2024. The OEB notes that the MNR did not address the Environmental Report in its written submission. However, the MNR was included as a member of the OPCC in the project contact list.²⁰ According to Enbridge Gas's stakeholder engagement logs, the MNR did not raise any questions but stated that if no MNR interests are identified based on the information contained in the MNR southern region information package, there was no need to further circulate material to the MNR as a commenting agency when undertaking consultation and review under the applicable environmental assessment process. The MNR did not provide comments through the OPCC process, on the Environmental Report.

Enbridge Gas noted that the Stage 1 Archaeological Assessment (AA) for the Waubuno Storage Pool site was completed in July 2024 and accepted by the Ministry of Citizenship and Multiculturalism (MCM) into the Ontario Public Register of Archeological Reports on August 17, 2024. The Stage 1 AA recommended a further Stage 2 AA. Enbridge Gas noted that the subsequent Stage 2 AA Report was completed in October 2024 and accepted by the MCM into the Ontario Public Register of Archaeological Reports on October 29, 2024 recommending no further assessment.

Enbridge Gas also stated that a Cultural Heritage Resource Screening Report was completed for the Project. Enbridge Gas stated that the Cultural Heritage Resource Screening Report did not identify any known or potential heritage concerns within the

¹⁹ Exhibit G, Tab 1, Schedule 1, Attachment 1: Dillon Consulting Ltd., Environmental Report: 2025 Waubuno Well Drilling Project, December, 2024

²⁰ Exhibit G, Tab 1, Schedule 1, Attachment 1: Dillon Consulting Ltd., Environmental Report: 2025 Waubuno Well Drilling Project, December, 2024, Appendix D

Project area.

Findings

Matters relating to Indigenous consultation and the Crown's duty to consult are addressed in a later section of this Report. The OEB has reviewed all of the remaining OPCC recommendations and finds that Enbridge Gas has satisfactorily identified and addressed potential environmental impacts and acknowledged OPCC's recommendations for pre- and post-construction. The OEB notes that one of the recommended Licence conditions in Attachment A is that prior to commencement of construction of the proposed well, Enbridge Gas shall receive all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the proposed well.

3.5 LANDOWNER MATTERS

As noted in section 3.2 of the Report, the Project requires the construction of a gravel pad, a permanent access lane, and temporary workspace.

Enbridge Gas stated that it has a Gas Storage Lease that includes the land where Well UW4 will be drilled, which gives it the land rights required to drill the well and construct a permanent access lane.²¹

Enbridge Gas also stated that its land agents have notified the parties directly impacted by the Project²² and that the landowners have been provided with a notice of work and compensation package²³.

Findings

The OEB finds that Enbridge Gas's Gas Storage Lease provides Enbridge Gas the land rights it needs to drill Well UW4 and construct the permanent access lane. The OEB also notes that Enbridge Gas is in ongoing communication with affected landowners and that it presented a compensation package to the affected landowners and tenants.

3.6 INDIGENOUS CONSULTATION

The MEM coordinates the procedural aspects of the Crown's duty to consult obligations that may be triggered by natural gas storage-related applications. With respect to the Crown's duty to consult related to the Project, Enbridge Gas contacted the MEM on

²¹ Application and Evidence, Exhibit H, Tab 1, Schedule 1, paragraph 7, page 2

²² Application and Evidence, Exhibit H, Tab 1, Schedule 1, paragraph 6, page 2

²³ Application and Evidence, Exhibit H, Tab 1, Schedule 1, paragraph 7, page 2

June 6, 2024. By letter dated August 12, 2024 (Delegation Letter), the MEM delegated the procedural aspects of the Crown's duty to consult for the Project to Enbridge Gas. In the Delegation Letter, the MEM identified five Indigenous communities with which Enbridge Gas should consult in relation to the Project:

- Aamjiwnaang First Nation
- Bkejwanong (Walpole Island First Nation)
- Chippewas of Kettle and Stony Point First Nation
- Chippewas of the Thames First Nation
- Oneida Nation of the Thames

Aamjiwnaang First Nation

Enbridge Gas representatives met with Aamjiwnaang First Nation representatives in a virtual Environment Committee Meeting. Aamjiwnaang First Nation raised questions on the species at risk survey and permits, archaeology summary, continued monitoring opportunities with Tri-Tribal Monitoring Services, project application and approval process, drilling depth process, and seismic testing.

Enbridge Gas addressed the community's concerns by answering questions in the virtual meeting, providing the Environmental Report for review and a monthly update on the Project. Enbridge Gas invited Aamjiwnaang First Nation representatives to participate in the Stage 2 Archaeology Assessment fieldwork and committed to continue working with the Aamjiwnaang First Nation environmental committee on the Project.

Chippewas of Kettle and Stony Point First Nation

Chippewas of Kettle and Stony Point First Nation inquired and commented on the Environmental Report. Among other areas that were addressed, the community expressed 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 the Environmental Report. Chippewas of Kettle and Stony Point First Nation also expressed concerns on the cumulative effects and the community's desire to expand such an assessment and review an environmental protection plan and well drilling program.

Enbridge Gas addressed the community's concerns by responding to Chippewas of Kettle and Stony Point First Nation's comments on the Environmental Report. Enbridge Gas provided monthly updates on the Project and submitted the Environmental Protection Plan to the community. Enbridge Gas committed to continuing to engage with the community in relation to the Project.

Chippewas of the Thames First Nation

Chippewas of the Thames First Nation commented on the Environmental Report and noted that the report should include a description of the Treaty context or Indigenous occupation of the area. Chippewas of the Thames First Nation also asked for the number of wells in the Designated Storage Area, and reasons for previous abandonments and whether the Project would change the existing capacity of the Waubuno Storage Pool. Enbridge Gas addressed the questions and made a commitment to continue to engage with the community in relation to the Project.

Oneida Nation of the Thames and Walpole Island First Nation

Enbridge Gas reached out to Oneida Nation of the Thames and Walpole Island First Nation and provided the Project information and the opportunities to engage and consult. Enbridge Gas stated that Oneida of the Thames and Walpole Island First Nation did not express any concerns related to the Project. Enbridge Gas confirmed its commitment to continue to engage with Oneida Nation and Walpole Island First Nation in relation to the Project.

The Letter of Opinion, filed on April 24, 2025, stated that the MEM has completed its review of Enbridge Gas's consultation report for the Project and had reached out to the Indigenous communities identified about concerns raised and/or proposed mitigation and was satisfied with the procedural aspects of the consultation undertaken by Enbridge Gas for the project to date. The MEM also expressed its expectation that Enbridge Gas will continue its consultation activities with Indigenous communities throughout the life of the Project, and that Enbridge Gas will notify MEM should any rights-based concerns or issues arise.

Findings

The OEB has reviewed the Indigenous consultation-related evidence and has no concerns with respect to the Indigenous consultation undertaken by Enbridge Gas related to the Project.

Enbridge Gas carried out consultations with the five Indigenous groups identified by the MEM. Comments, questions and concerns raised by Aamjiwnaang First Nation, Chippewas of Kettle and Stony Point First Nation and Chippewas of the Thames First Nation have been addressed in this proceeding.

On April 24, 2025 Enbridge Gas received a Letter of Opinion from the MEM confirming that the procedural aspects of the consultation undertaken by Enbridge Gas are satisfactory.

The OEB finds that Enbridge Gas has consulted with the Indigenous communities identified by the MEM and has committed to continue to engage with those communities, and has satisfied the delegated procedural aspects of the Crown's duty to consult.

Considering the current evidentiary record on Indigenous consultation for the Project, the OEB finds that to the extent that the duty to consult has been triggered by the Project, the duty to consult has been discharged sufficiently to allow the OEB to issue a favorable Report recommending that a licence to drill Well UW4 in the Waubuno Pool be issued by the Minister.

3.7 RECOMMENDED CONDITIONS OF LICENCE

As part of a question for Enbridge Gas, OEB staff proposed certain Conditions of Licence that are similar to those recommended by the OEB in past well drilling licence applications.²⁴

In response to the OEB staff question, Enbridge Gas stated that it had no objections to the recommended conditions.²⁵

Findings

The OEB recommends the conditions proposed by OEB staff and notes that Enbridge Gas agreed that these conditions be added to the licence to drill Well UW4.

4 RECOMMENDATION

For the reasons stated in the Report, the OEB recommends approval of the application for the well drilling licence, subject to the recommended Conditions of Licence in Attachment A. This recommendation shall expire twelve months from the date of this report.

²⁴ OEB Report, February 8, 2024, Enbridge Gas Inc. Licences to drill A-1 carbonate observation wells in each of the Bluewater Storage Pool in the City of Sarnia and the Mandaumin Storage Pool EB-2023-0271

²⁵ Enbridge Gas Response to OEB I.Staff-4

DATED at Toronto, May 8, 2025

ONTARIO ENERGY BOARD

Theodore Antonopoulos
Vice President
Major Applications

ATTACHMENT A

To EB-2024-0304

REPORT OF THE OEB TO THE MINISTER OF NATURAL RESOURCES

**APPLICATION BY ENBRIDGE GAS INC. FOR THE
WAUBUNO WELL DRILLING PROJECT**

RECOMMENDED CONDITIONS OF LICENCE

May 8, 2025

Attachment A

Application Under Section 40 of OEB Act

Enbridge Gas Inc.

EB-2024-0304

Recommended 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 well.
2. The authority granted under this licence to Enbridge Gas is not transferable to another party without leave of the OEB. For the purpose of this condition, another party is any party except Enbridge Gas.
3. Enbridge Gas shall construct the facilities and restore the land in accordance with its application and evidence given to the OEB, except as modified by this licence and these Conditions.
4. Enbridge Gas shall implement all the recommendations of the Environmental Report filed in the proceeding.
5. Enbridge Gas shall develop a Project-specific Spill Response Plan prior to the start of well drilling operations and following the installation of the Project facilities, the location of the facilities will be added to Enbridge Gas's Emergency Response Plan.
6. Prior to commencement of construction of the Proposed Well, Enbridge Gas shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the proposed well.
7. Enbridge Gas shall ensure that the movement of equipment is carried out in compliance with all procedures filed with the OEB, and as follows:
 - i. Enbridge Gas shall make reasonable efforts to keep the affected landowner(s) as well as adjacent landowners and their respective tenant farmers, or their designated representatives, informed of its plans and construction activities; and
 - ii. The installation of facilities and construction shall be coordinated to minimize disruption of agricultural land and agricultural activities.

8. Enbridge Gas shall, subject to the recommendation of an independent tile contractor and subject to the landowner's approval, construct upstream and downstream drainage headers adjacent to the drilling area and access roads that cross existing systematic drainage tiles, prior to the delivery of heavy equipment, so that continual drainage will be maintained.
9. Concurrent with the final monitoring report referred to in Condition 10(b), Enbridge Gas shall file a Post Construction Financial Report, which shall provide a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized. Enbridge Gas shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Enbridge Gas proposes to start collecting revenues associated with the Project, whichever is earlier.
10. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:
 - a) A Post Construction Report, within three months of the in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 1
 - ii. Describe any impacts and outstanding concerns identified during construction
 - iii. Describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
 - iv. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) A Final Monitoring Report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:

- i. Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 4
- ii. Describe the condition of any rehabilitated land
- iii. Describe the effectiveness of any actions taken to prevent or mitigate any identified impacts during construction
- iv. Include the results of analyses and monitoring programs and any recommendations arising therefrom;
- 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 (MNR)
- b) And the requirements for well 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 MNR.

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 MNR, 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.