



# **DECISION AND ORDER**

**EB-2024-0322**

## **ENBRIDGE GAS INC.**

**Application for approval to increase the maximum operating pressures of the  
Kimball-Colinville and Bickford natural gas storage pools  
located in St. Clair Township, Lambton County, Ontario**

**BEFORE:** **Anthony Zlahtic**  
Presiding Member

**Shahrzad Rahbar**  
Member

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**May 13, 2025**



## TABLE OF CONTENTS

|            |   |           |
|------------|---|-----------|
| <b>1</b>   | <b>OVERVIEW OF APPLICATION.....</b>     | <b>1</b>  |
| <b>2</b>   | <b>PROCESS.....</b>                     | <b>5</b>  |
| <b>3</b>   | <b>DECISION.....</b>                    | <b>7</b>  |
| <b>3.1</b> | <b>CSA Z341.1-22 REQUIREMENTS .....</b> | <b>7</b>  |
| <b>3.2</b> | <b>NEED AND ALTERNATIVES .....</b>      | <b>9</b>  |
| <b>3.3</b> | <b>COSTS AND ECONOMICS .....</b>        | <b>10</b> |
| <b>3.4</b> | <b>LAND MATTERS.....</b>                | <b>11</b> |
| <b>3.5</b> | <b>ENVIRONMENTAL MATTERS.....</b>       | <b>12</b> |
| <b>3.6</b> | <b>INDIGENOUS CONSULTATION .....</b>    | <b>13</b> |
| <b>3.7</b> | <b>CONDITIONS OF APPROVAL.....</b>      | <b>14</b> |
| <b>4</b>   | <b>ORDER .....</b>                      | <b>15</b> |

# 1 OVERVIEW OF APPLICATION

On December 11, 2024, Enbridge Gas Inc. (Enbridge Gas) filed an application for the Ontario Energy Board's (OEB) approval to increase the maximum operating pressure (MOP) of the Kimball-Colinville Storage Pool and the Bickford Storage Pool (Pools), both located in St. Clair Township in the County of Lambton (Project). The application is made pursuant to section 38(1) of the *Ontario Energy Board Act, 1998* (OEB Act). Table 1 below<sup>1</sup> indicates the current and proposed increased MOP gradients in the Pools:

Table 1: Current and Proposed Maximum Pressure Gradients in the Kimball-Colinville and Bickford Storage Pools

| Storage Pool       | Current Gradient          | Proposed Gradient            |
|--------------------|---------------------------|------------------------------|
| Bickford           | 17.2 kPa/m<br>0.76 psi/ft | 17.64 kPa/m<br>0.78 psi/ft   |
| Kimball-Colinville | 15.7 kPa/m<br>0.69 psi/ft | 16.625 kPa/m<br>0.735 psi/ft |

Enbridge Gas plans to start operating the Bickford Pool up to the increased MOP in November 2025 and in Kimball-Collinville Pool in November 2026.<sup>2</sup> Increasing the MOP of the Pools will allow Enbridge Gas to store additional natural gas.

In 1963 and in 1972 respectively, the OEB granted to Enbridge Gas's predecessors the authority to operate the Kimball-Colinville Storage Pool and the Bickford Storage Pool, without imposing MOP related conditions on those orders.<sup>3</sup> Enbridge Gas operates the Kimball-Colinville Storage Pool at the current MOP in adherence to a condition in EBRM 91<sup>4</sup> which limited MOPs in all pools to a pressure gradient of 0.7 psi/ft (15.9 kPa/m) without requiring leave from the OEB. The current MOP in the Bickford Pool is 0.76 psi/ft (17.2 kPa/m), which was established prior to EBRM 91.<sup>5</sup>

<sup>1</sup> Exhibit A, Tab 2, Schedule 1, paragraph 9, page 4

<sup>2</sup> Exhibit B, Tab 1, Schedule 1, paragraph 3, page 1- Timing

<sup>3</sup> The Order E.B.O. 5 issued on December 2, 1963 to Tecumseh Gas Storage Limited allowing it to inject/store/remove gas from the Kimball-Colinville Storage Pool does not contain a condition setting the maximum operating pressure. The Order E.B.O. 32 issued on January 21, 1972 to Union Gas allowing it to inject/store/remove gas from the Bickford and Sombra pools does not contain a condition of approval limiting maximum operating pressure of the Bickford Pool.

<sup>4</sup> EBRM 91 - Report to the Minister of Natural Resources, September 22, 1988

<sup>5</sup> Exhibit A, Tab 2, Schedule 1, paragraphs 6 and 7, pages 2-3

Enbridge Gas submitted that the proposed MOP increases are permitted under CSA Standard Z341.1-22 – Storage of Hydrocarbons in Underground Storage Formations (CSA Z341.1-22). Enbridge Gas has committed to comply with CSA Z341.1-22 MOP requirements to the satisfaction of the Ministry of Natural Resources (MNR).

Enbridge Gas requested that the OEB approve the application and suggested the following wording for conditions of approval:

- i. *Enbridge Gas Inc. shall not operate the Kimball-Colinville Storage Pool above an operating pressure representing a pressure gradient of 16.625 kPa/m (0.735 psi/ft) of depth without leave of the OEB.*
- ii. *Enbridge Gas Inc. shall not operate the Bickford Storage Pool above an operating pressure representing a pressure gradient of 17.64 kPa/m (0.78 psi/ft) of depth without leave of the OEB.*

Enbridge Gas stated that incremental storage capacity created by increasing the MOP in the Pools will be sold to third parties as part of Enbridge Gas's unregulated storage business.

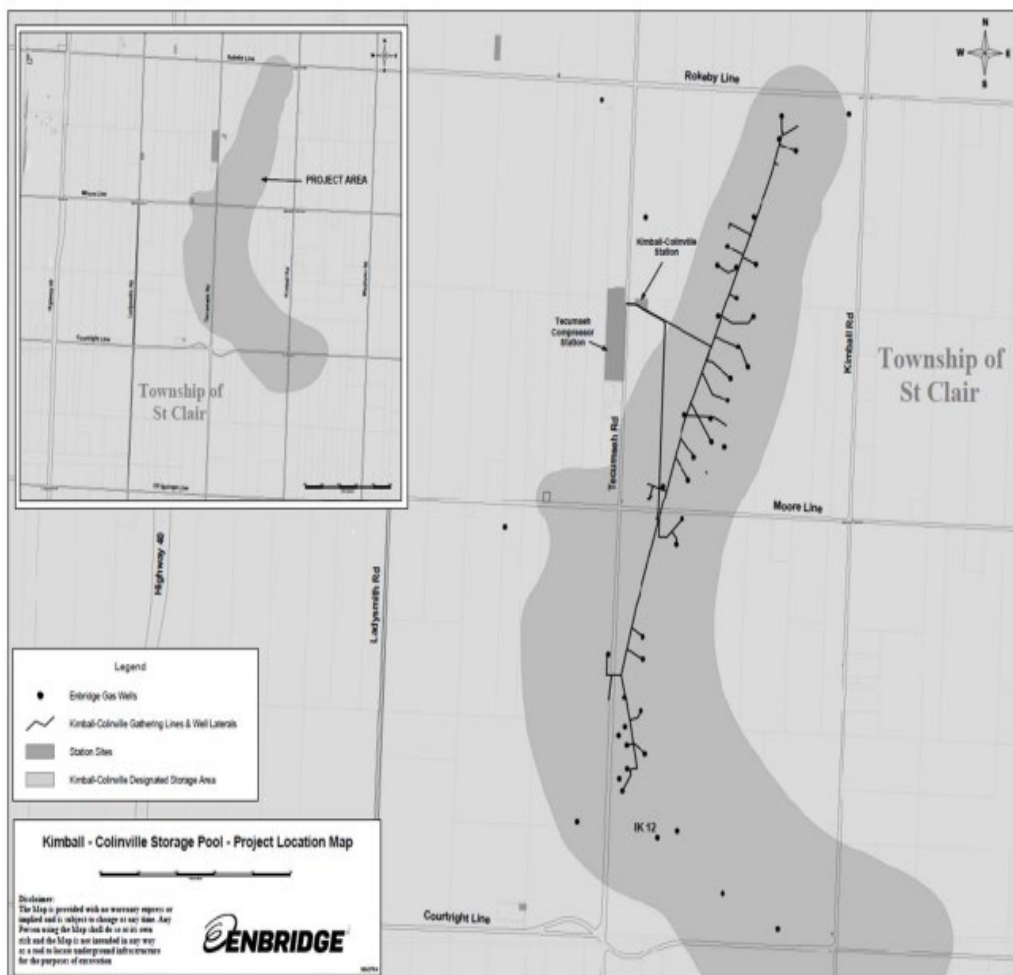
Enbridge Gas indicated that, to implement the MOP increases, it needed to upgrade the existing facilities in the Pools. Enbridge Gas stated that facilities upgrades do not require approval of the OEB.<sup>6</sup> The facilities upgrades include: replacements of components of Bickford Station in the Bickford Storage Pool and upgrades to wellheads and well crossovers, installation of emergency shutdown valves on injection/withdrawal natural gas storage wells, re-abandonment of one natural gas storage well, replacement of well lateral tees, various natural gas gathering pipeline replacements, and replacements of various components in the Kimball-Colinville Station within the Kimball-Colinville Storage Pool.<sup>7</sup>

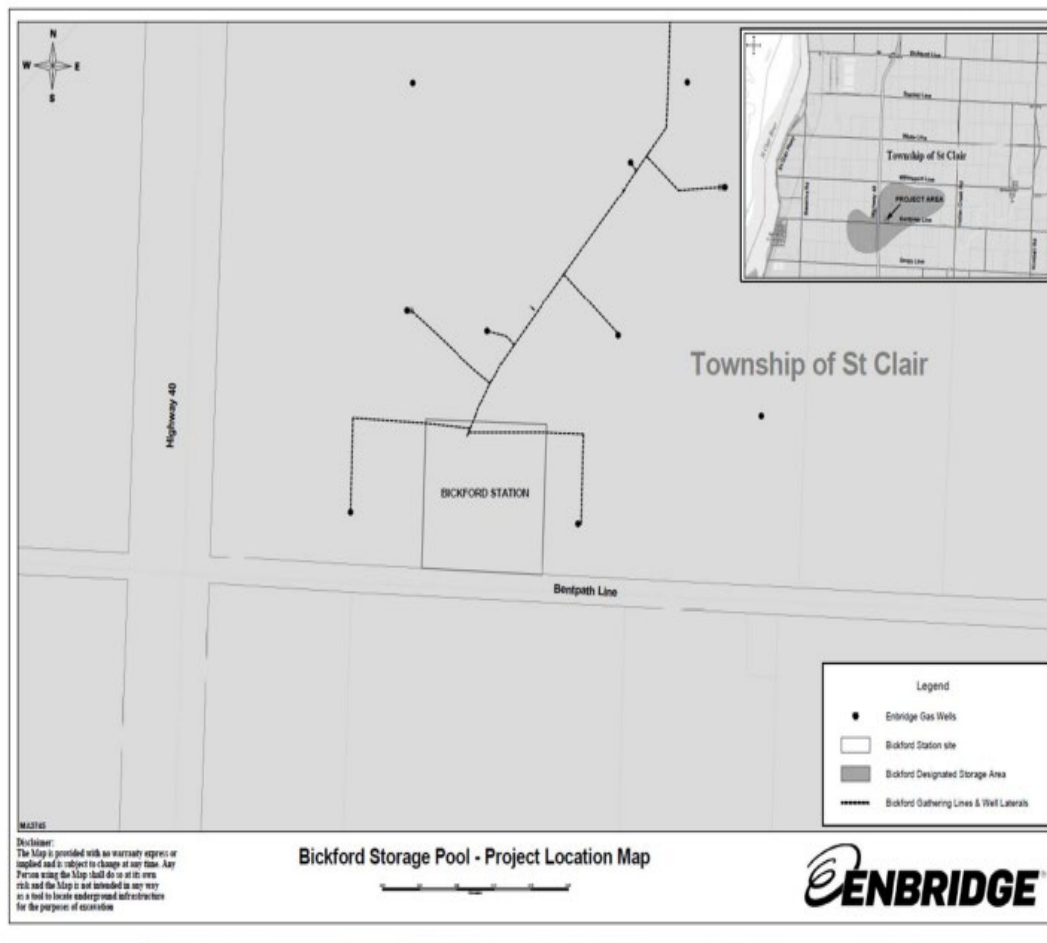
General locations of the Project in the Pools are presented in the maps below.

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<sup>6</sup> Enbridge Gas response to I-STAFF-.2 b)

<sup>7</sup> Exhibit C, Tab 1, Schedule 1, pages 5-7 Proposed Facilities

Kimball-Colinville Storage Pool Project Location<sup>8</sup><sup>8</sup> Exhibit A, Tab 2, Schedule 1, Attachment 1

Bickford Storage Pool-Project Location<sup>9</sup>

For the reasons set out below, the OEB approves Enbridge Gas's application subject to the conditions attached as Schedule A to this Decision and Order.

<sup>9</sup> Exhibit A, Tab 2, Schedule 1, Attachment 2

## 2 PROCESS

The OEB issued its Notice of Application on January 29, 2025 and proceeded by written hearing.

On February 10, 2025, Hilton Johnston requested intervenor status in the proceeding. The OEB issued Procedural Order No. 1 on February 28, 2025, setting the procedural schedule and denying intervenor status to Hilton Johnston.<sup>10</sup> Procedural Order No. 1 set the schedule for written discovery on Enbridge Gas's evidence through interrogatories and for written submissions by OEB staff and Enbridge Gas. In accordance with the procedural schedule, OEB staff filed written interrogatories on March 11, 2025. Enbridge Gas filed responses to OEB staff interrogatories on March 21, 2025. On April 1, 2025, OEB staff filed written submissions. On April 11, 2025, Enbridge Gas filed written reply submissions.

The OEB received a letter of comment from Hilton Johnston on April 1, 2025. Enbridge Gas filed its response on April 11, 2025, completing the record for the proceeding.

### *Comments by Hilton Johnston*

In the letter, Hilton Johnston took the position that Enbridge Gas shareholders financially benefited from using previously developed ratepayer space to meet unregulated demand. Hilton Johnston proposed that Enbridge Gas not pursue increases in maximum operating pressures to add storage capacity but instead develop greenfield storage pools to meet unregulated demand. The letter also requested that Enbridge Gas increase compensation for increased operating pressure (i.e., delta pressuring) projects for ratepayers and landowners.

In its response to the letter of comment, Enbridge Gas noted that the OEB denied intervenor status to Hilton Johnston for the reason that he did not demonstrate a substantial interest in the proceeding. Enbridge Gas submitted that the letter of comment still did not demonstrate a substantial interest. Enbridge Gas submitted that Hilton Johnston's comments include several factually inaccurate and out-of-scope submissions. Enbridge Gas replied that the development and operation of storage pools have been in accordance with the Natural Gas Electricity Interface Review decision

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<sup>10</sup> Hilton Johnston's intervention request stated that he is a sole proprietor who provides geological engineering knowledge and advice to Ontario natural gas producers. His intervention request indicated that he represents HPJ Geological Engineering Ontario (HPJ GEO) Inc. As explained in the Procedural Order No. 1 the OEB found that Hilton Johnston has not demonstrated that he had a substantial interest in EB-2024-0322 proceeding and denied his intervention request for that reason.

(NGEIR Decision)<sup>11</sup> and that the NGEIR Decision established a regulatory framework that has been operating successfully for nearly two decades. Enbridge Gas submitted (in part) that under the NGEIR Decision, utility shareholders bear the risk of any storage development in the competitive market, which includes enhancement to existing storage facilities or new storage development; and that investments required to increase storage space are fully funded by the non-utility business. Enbridge Gas submitted that Mr. Johnston's suggestion that the OEB should now force Enbridge Gas to develop new greenfield storage pools over other methods is not in the spirit of placing all development risk on Enbridge Gas's non-utility storage business. Finally, Enbridge Gas submitted that it fairly compensates the landowners for the use of the lands and any crop loss associated with operations and projects. Enbridge Gas submitted that Mr. Johnston is requesting that the OEB require further compensation to ratepayers and landowners without any established methodology to calculate this compensation and without identifying where the NGEIR Decision or existing practice was deficient. Enbridge Gas submitted that no further action is required.

The OEB has reviewed and considered the Hilton Johnston letter and the Enbridge Gas response. The OEB finds that Hilton Johnston's comments and concerns address matters that are beyond the scope of the proceeding (for example, landowners compensation and the suggestion that Enbridge Gas should be required to develop new greenfield storage pools). The current proceeding deals with a request for approval to increase pressure in two existing storage pools under section 38(1) of the OEB Act. The OEB finds that the Johnston letter does not establish a basis for denying the current application.

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<sup>11</sup> [EB-2005-0551 Decision with Reasons](#)



### 3 DECISION

The Decision section is organized as follows:

- 3.1 CSA Z341-22 Requirements
- 3.2 Project Need and Alternatives
- 3.3 Costs and Economics
- 3.4 Environmental Matters
- 3.5 Land Matters
- 3.6 Indigenous Consultation
- 3.7 Conditions of Approval

In summary, the OEB approves the application. As discussed below, the OEB is satisfied with the application and Enbridge Gas's responses to OEB staff questions as they relate to matters such as need, cost, environmental matters, land matters and Indigenous consultation related to the Project.

Regarding Enbridge Gas's compliance with applicable CSA Z341-11 requirements, the OEB approves the increase of the MOP of the Kimball-Colinville Storage Pool and Bickford Storage Pool subject to the two conditions proposed by Enbridge Gas and a condition that Enbridge Gas comply with the relevant requirements of CSA Z341-22 to the satisfaction of the Ministry of Natural Resources.

#### 3.1 CSA Z341.1-22 REQUIREMENTS

Proposed changes in MOP must comply with the parameters set by CSA Z341.1-22. Enbridge Gas referenced Clause 5.6.2 (b) of CSA Z341.1-22:

The maximum operating pressure shall not exceed 80% of the fracture pressure of the caprock formation. In the absence of local fracture pressure data, the maximum pressure shall be not greater than 18.1 kPa per metre of depth to the top of the reservoir.<sup>12</sup>

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<sup>12</sup> Exhibit C, Tab 1, Schedule 1, paragraph 3, page 1

Enbridge Gas submitted that the proposed MOP increases are permitted under CSA Z341.1-22. Enbridge Gas also stated that the MOP increases must conform with CSA Z341.1-22, the *Oil, Gas and Salt Resources Act* and related regulations to the satisfaction of the MNR.

Enbridge Gas described its communication with the MNR regarding the Project.<sup>13</sup> On September 16, 2024 Enbridge Gas met with MNR staff to present the Project. On November 26, 2024, Enbridge Gas sent an email to the MNR indicating that the following three studies had been completed for each pool in compliance with CSA Z341.1-22 to support the application for MOP increases:

- Engineering studies completed by Geofirma Engineering Ltd.
- Assessment of Neighboring Activities for the storage pools as prescribed by CSA Z341.1-22 Clause 5.2.
- “What If” analysis of hazards and operability (HAZOP) for the storage pools

Enbridge Gas included executive summaries of the three studies for each pool in the evidence in support of the application.<sup>14</sup> Enbridge Gas sent summaries of the studies to the MNR and noted it would make complete studies available for the MNR’s review in Enbridge Gas’s office, upon MNR’s request. Enbridge Gas stated that there was no further communication with the MNR on the Project. Enbridge Gas does not anticipate receiving further communication from the MNR related to the three engineering and geological studies.<sup>15</sup>

OEB staff had no concerns with Enbridge Gas compliance with the regulatory requirements related to the proposed increases in MOP in the Pools and notes Enbridge Gas’s commitment to comply with the relevant regulatory requirements to the satisfaction of the MNR.<sup>16</sup> To ensure that Enbridge Gas adheres to CSA Z341.1-22 to the satisfaction of the MNR, OEB staff proposed that the OEB attach the following condition of approval:

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<sup>13</sup> Enbridge Gas response to interrogatory I-STAFF-1, pages 2-3

<sup>14</sup> Exhibit I, Tab 1, Schedule 1, Attachment 3 Bickford Storage Pool and Attachment 4 Kimball-Colinville Storage Pool

<sup>15</sup> Enbridge Gas response to interrogatory I.STAFF-1, page 3

<sup>16</sup> OEB Staff Submission, April 1, 2025, page 10 and Condition No. 3, Appendix A

*For the purpose of increasing the Maximum Operating Pressure in the Kimball-Colinville Storage Pool and the Bickford Storage Pool, to gradients specified in this application, Enbridge Gas Inc. shall conform with the relevant requirements of the Canadian Standards Association Z341.1-22 "Storage of Hydrocarbons in Underground Formations" standard to the satisfaction of the Ministry of Natural Resources.*

Enbridge Gas agreed to adhere to the above condition as proposed by OEB staff.<sup>17</sup>

## Findings

The OEB approves Enbridge Gas's application to increase the MOP of the Kimball-Colinville Storage Pool to maximum pressure gradient of 16.625 kPa/m (0.735 psi/ft) and the Bickford Storage Pool to a maximum pressure gradient of 17.64 kPa/m (0.78 psi/ft). The revised pressures are within the limits prescribed by the CSA Z341 standard and supported by engineering studies completed by Geofirma Engineering Ltd.

The OEB expects that Enbridge Gas will comply with applicable requirements of the *Oil, Gas and Salt Resources Act*, O.Reg. 245/97, the Provincial Standards, and CSA Z341.1-22 to the operation of the Pools to the satisfaction of the MNR.

## 3.2 NEED AND ALTERNATIVES

According to Enbridge Gas, the Project is needed to add storage capacity to address the growing market demand for unregulated storage services. Enbridge Gas stated that it is fully contracted with respect to storage capacity and deliverability and that the demand for unregulated storage exceeds the contracts able to be awarded.<sup>18</sup>

The increase of the MOP will create 112,700 10<sup>3</sup>m<sup>3</sup> (4 Bcf) additional capacity in the Kimball-Colinville Storage Pool and 24,500 10<sup>3</sup>m<sup>3</sup> (0.9 Bcf) additional capacity in the Bickford Storage Pool. Enbridge Gas intends to sell the capacity as part of its unregulated storage business at market-based prices.

Regarding the alternatives to the Project Enbridge Gas submitted that the Project is the only option to increase MOP in the Pools.

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<sup>17</sup> Enbridge Gas Reply Submission, April 11, 2025, paragraph 15, page 5

<sup>18</sup> Enbridge Gas response to OEB staff interrogatory Exhibit I.STAFF-3, c)

OEB staff had no concerns with the need for the Project and agreed that there are no alternatives to increasing the MOP in the Pools.

## Findings

The OEB finds that Enbridge Gas has established the need for the Project based on its existing regulated and unregulated storage being fully needed/contracted and expectation that there will be demand for the unregulated storage capacity created by the Project when offered to market. The OEB accepts Enbridge Gas's assessment that there are no alternatives to increase the storage capacity of its existing Storage Pools other than through an increase in the MOP. The OEB further accepts Enbridge Gas's judgement on the selection of Kimball-Colinville and Bickford Storage Pools based on its knowledge of the geological characteristics and experience with other storage pools that have undergone an increase in MOP.

## 3.3 COSTS AND ECONOMICS

Enbridge Gas stated that the entire Project will form part of Enbridge Gas's unregulated storage operations and that all costs associated with the Project will be captured in the unregulated accounts.<sup>19</sup>

Enbridge Gas noted that it does not track regulated and unregulated capacity at the individual storage pool levels.<sup>20</sup> The current regulated and unregulated allocator for all storage pools owned by Enbridge Gas, including the Bickford and Kimball-Colinville Storage Pools, for 2025 is 62.3% regulated and 37.7% unregulated. Enbridge Gas further stated that, assuming that the Project is approved, the allocators are forecasted to be 62.2% regulated and 37.8% unregulated in 2026 and 61.5% regulated and 38.5 % unregulated in 2027. Enbridge Gas indicated that the allocators will be updated annually for the overall integrated system of storage pools owned by Enbridge Gas.<sup>21</sup>

Enbridge Gas submitted that the capacity and deliverability created by the proposed Project will be for the benefit of the unregulated business, and that all the capital costs for the Project will be funded by the unregulated business.<sup>22</sup>

In the submission OEB staff asked Enbridge Gas to identify in its reply submission

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<sup>19</sup> Enbridge Gas response to OEB staff interrogatory Exhibit I.STAFF-2 b)

<sup>20</sup> Enbridge Gas response to OEB staff interrogatory Exhibit I.STAFF-3

<sup>21</sup> EB-2024-0111 Decision on Settlement Proposal and Interim Rate Order, November 29, 2024, page 6

<sup>22</sup> Enbridge Gas response to OEB staff interrogatory Exhibit I.STAFF-2 b)

the annual application in which these updates will be filed. Enbridge Gas responded that the allocator updates will be filed in its annual Utility Earnings and Disposition of Deferral & Variance Account Balances Application.<sup>23</sup>

OEB staff had no concerns about the costs and economics of the Project considering that Enbridge Gas adheres to the cost allocation methodology approved by the OEB.

## Findings

The OEB accepts Enbridge Gas's position that the costs for the Project will have no direct impact on its rate regulated customers given that it will allocate all of the costs to its unregulated storage operations. The OEB notes the undertaking Enbridge Gas gave in its reply submission to adhere to the OEB's decision on the Phase 2 settlement proposal and update the regulated/unregulated allocators in its annual Utility Earnings and Disposition of Deferral & Variance Account Balances Application. The OEB expects Enbridge Gas to abide by the undertaking and update the allocators in the annual deferral and variance account and earnings sharing proceeding.

## 3.4 LAND MATTERS

In the Kimball-Colinville Storage Pool, Enbridge Gas will construct multiple temporary laneways and temporary workspaces on privately owned land and on land owned by Enbridge Gas. Construction of pipeline replacements will also require temporary workspace.

In the Bickford Storage Pool, Enbridge Gas will complete all the upgrades of the Bickford Station on the land it owns.

Enbridge Gas noted that the Gas Storage Lease Agreement registered on the title of the properties in the Kimball-Colinville Storage Pool grants to Enbridge Gas the right to construct, operate, maintain, inspect, remove, replace, reconstruct and repair roadways, pipes or pipelines, tanks, stations, structures, compressors and equipment. Enbridge Gas said it would compensate the owners of the land within the boundaries of the Kimball-Colinville Storage Pool area for temporary use of land and any crop loss associated with the Project and will continue to keep the landowners informed about the progress of the Project.

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<sup>23</sup> Enbridge Gas Inc. Reply Submission, April 11, 2025, paragraph 11, page 4

OEB staff submitted that it had no issues or concerns with land matters related to the Project.

### Findings

The OEB finds that Enbridge Gas has appropriately addressed land related matters and that there are no outstanding issues to address.

## 3.5 ENVIRONMENTAL MATTERS

Stantec Consulting Ltd. (Stantec), retained by Enbridge Gas, conducted an environmental assessment for the Project and completed Environmental Screening Report, dated December 6, 2024<sup>24</sup>. Environmental screening was conducted in consideration of the impact identification and assessment process outlined in the Ontario Energy Board's *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 2023* (OEB Environmental Guidelines). The Environmental Screening Report identified potential environmental and socio-economic impacts associated with the installation of temporary access roads, gathering line replacements, station component replacements, well crossover replacements and wellhead upgrades for the Project, in the Bickford and Kimball-Colinville Storage Pools.

The Environmental Screening Report established mitigation and protective measures that may be used to reduce and/or eliminate potential impacts. According to the Environmental Screening Report, the implementation of the recommendations and adherence to permit, regulatory and legislative requirements will ensure that potential adverse residual environmental and socio-economic impacts of the Project are not significant.

OEB staff had no concerns with the environmental aspects of the Project, given Enbridge Gas's commitment to implementing the mitigation measures and recommendations in the Environmental Screening Report.

### Findings

The OEB finds that Enbridge Gas has followed the requirements of the OEB's Environmental Guidelines. The OEB notes Enbridge Gas's commitment to implement the mitigation measures recommended by Stantec. The OEB has recommended

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<sup>24</sup> Exhibit E, Tab 1, Schedule 1, Attachment 1

conditions for the well licence which Enbridge Gas has agreed to. The OEB is satisfied that with implementation of these mitigation measures and conditions for aspects of the Project, environmental related matters will be adequately addressed.

### 3.6 INDIGENOUS CONSULTATION

In accordance with the OEB Environmental Guidelines, Enbridge Gas filed a letter with the Ministry of Energy and Mines on October 8, 2024 requesting a determination on duty to consult requirements for the Project. Enbridge Gas included in the letter a description of the Project, Project development, regulatory requirements and foreseen environmental impacts.<sup>25</sup>

By a letter dated December 6, 2024 (Delegation Letter), the Ministry of Energy and Electrification provided its view that the Project "...will not result in any appreciable adverse impacts to the asserted or established rights of any First Nation or Métis communities." The Delegation Letter did not identify any Indigenous community potentially impacted by the Project. The Delegation Letter asked that Enbridge Gas notify the Ministry of Energy and Electrification should "...new project information become available that indicates a potential to impact Aboriginal and treaty rights".<sup>26</sup> No further communication between Enbridge Gas and the Ministry of Energy and Electrification was indicated on the record of the proceeding.

OEB staff had no concerns about Enbridge Gas's approach to Indigenous consultation related to increasing MOP in Kimball-Colinville and Bickford storage pools. OEB staff referred to the Delegation Letter which indicated no significant impacts of the Project on any First Nation or Métis communities.<sup>27</sup>

### Findings

The OEB notes that the Ministry of Energy and Electrification's Delegation Letter did not identify any Indigenous community that will be impacted by the Project. The Delegation Letter further indicated that the Project will not result in any appreciable adverse impacts to the asserted or established rights of any First Nation or Métis communities.

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<sup>25</sup> Exhibit G, Tab 1, Schedule 1, Attachment 1, pages 1-12

<sup>26</sup> Exhibit G, Tab 1, Schedule 1, Attachment 2, pages 1-2

<sup>27</sup> OEB Staff Submission, April 1, 2025, page 7

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### 3.7 CONDITIONS OF APPROVAL

Section 23 of the OEB Act permits the OEB, when making an order, to impose conditions of approval.

Enbridge Gas requested that a condition of approval be placed on each of the Kimball-Colinville Storage Pool and the Bickford Storage Pool similar to the condition that was attached to the OEB's approval in the EB-2020-0074 proceeding for increasing the MOP of the Black Creek, Coveny and Wilkesport Storage Pools.

OEB staff submitted that the wording of the conditions proposed by Enbridge Gas is appropriate.

OEB staff proposed a condition of approval that would require Enbridge Gas to comply with the relevant requirements of CSA Z341-22 to the satisfaction of the MNR. Enbridge Gas accepted that condition.

#### Findings

The OEB imposes the conditions of approval attached as Schedule A to this Decision and Order.



## 4 ORDER

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Enbridge Gas Inc. is granted approval to increase maximum operating pressures in the Kimball-Colinville Storage Pool and Bickford Storage Pool, subject to conditions set in Schedule A.
2. Enbridge Gas Inc. shall pay the OEB's costs incidental to this proceeding upon receipt of the OEB's invoice.

**DATED** at Toronto May 13, 2025

**ONTARIO ENERGY BOARD**

Nancy Marconi  
Registrar

**SCHEDULE A**  
**DECISION AND ORDER**  
**ENBRIDGE GAS INC.**  
**EB-2024-0322**  
**MAY 13, 2025**

## **APPLICATION UNDER SECTION 38(1) THE OEB ACT**

**Enbridge Gas Inc.**

**EB-2024-0322**

### **CONDITIONS OF APPROVAL**

1. Enbridge Gas Inc. shall not operate the Kimball-Colinville Storage Pool above an operating pressure representing a pressure gradient of 16.625 kPa/m (0.735 psi/ft) of depth without leave of the OEB.
2. Enbridge Gas Inc. shall not operate the Bickford Storage Pool above an operating pressure representing a pressure gradient of 17.64 kPa/m (0.78 psi/ft) of depth without leave of the OEB.
3. For the purpose of increasing the Maximum Operating Pressure in the Kimball-Colinville Storage Pool and the Bickford Storage Pool, to gradients specified in this application, Enbridge Gas Inc. shall conform with the relevant requirements of the Canadian Standards Association Z341.1-22 "Storage of Hydrocarbons in Underground Formations" standard to the satisfaction of the Ministry of Natural Resources.