



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

BY EMAIL

January 6, 2026

Ritchie Murray, Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Mr. Murray:

Re: EB-2025-0293 Kimball-Colinville Well Drilling Licence Application, OEB Staff Questions

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

Enbridge Gas's responses to the questions are due **by January 16, 2026**.

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

Yours truly,

Original Signed By

Zora Crnojacki
Senior Advisor

Encl.

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

OEB Staff Questions

Enbridge Gas Inc. EB-2025-0293

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

Staff - 1

Ref.: Exhibit B, Tab 1, Schedule 1, pages 1-7

Preamble:

The Project includes the drilling of the proposed injection/withdrawal wells Tecumseh Kimball-Colinville 70, Moore 17-7-VI (TKC 70) and Tecumseh Kimball-Colinville 71, Moore 8-17-VIII (TKC 71) to replace withdrawal capability and restore the ability to cycle the Kimball-Colinville Pool lost as the result of abandonment of two wells (TKC 29 and TKC 36). The two new wells will replace 2,562 103m³/day (100TJ/d) of withdrawal capability lost by abandoning the TKC 29 and TKC 36 wells.

Enbridge Gas noted¹ that the Project is the first phase of a four-year program to abandon and replace eight injection/withdrawal wells due to integrity concerns with the well' casings. Enbridge Gas stated that the total number of new wells required to replace the lost injection and withdrawal capability will be assessed annually based on the actual performance of the two new wells TKC 70 and TKC 71.

Questions:

- a) Please discuss if Enbridge Gas has considered designing wells TKC 70 and TKC 71 to accommodate higher flow capabilities than that of TKC 29 and TKC 36 in order to potentially reduce the number of wells to be drilled in the future, to replace the capacity lost from the abandonment of six additional wells. If not, please explain why not.

¹ 2025-2034 Asset Management Plan (filed November 8, 2024, section 6.3.6.3.2. page 223 and Appendix B, page 43 (EB-2020 0091)

- b) Please discuss the risks and consequences of the Project's in-service delay to overall Kimball-Colinville operations and reliability in the next injection/withdrawal season.
- c) How would a delay in the Project's in-service date affect subsequent phases of the abandonment and replacement of wells over the next four years?

Staff - 2

Ref.: Exhibit D, Tab 1, Schedule 1, pages 1-5, Project, Engineering and Construction

Preamble:

As a proposed 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 *Oil, Gas and Salt Resources Act* (OGSRA); O. Reg. 245/97 made under the OGSRA; and OGSRA Standards v.3.0, to the satisfaction of the Ministry of Natural Resources (MNR). In its application, Enbridge Gas acknowledged this requirement.

Enbridge Gas stated that it submitted licence applications (Licence Application) via email to MNR on September 2, 2025. The MNR acknowledged receipt on September 3, 2025. On September 15, 2025 the MNR requested additional information. On September 17, 2025, Enbridge Gas filed the updated Licence Application with additional information as requested by the MNR. The MNR acknowledged the receipt of the updated application on September 19, 2025.

The Licence Application indicates that the following studies were conducted in compliance with CSA Z341.1-22:

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

Questions:

- a) Since filing the application with the OEB, has Enbridge Gas received any further communication from MNR subsequent to the email on September 19, 2025?
- b) If any communication was received, please indicate whether MNR stated it is satisfied with the studies and if Enbridge Gas complied with all relevant requirements under CSA Z341.1-22, the OGSRA standards and related regulations.

- c) Please file a copy of any additional correspondence with MNR since email of September 19, 2025.

Staff - 3

Ref.: Exhibit H, Tab 1, Schedule 1, Attachment 2, Delegation Letter by the Ministry of Energy and Mines; Attachment 5, Indigenous Consultation Report; Attachment 6, Indigenous Consultation Log

Preamble:

On June 17, 2025, Enbridge Gas has received a letter from the Ministry of Energy and Mines (MEM) identifying five Indigenous communities to be consulted as they are potentially affected by the Project (Delegation Letter). By way of the Delegation Letter, MEM delegated procedural aspects of the consultation to Enbridge Gas. The following Indigenous communities have to be consulted 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

The MEM determined in the Delegation Letter, based on its preliminary assessment, that consultation is owed at the low level of the consultation spectrum for the five Indigenous communities. The Delegation Letter also stated that Enbridge Gas should contact the MEM for updated guidance if information becomes available during the consultation process suggesting that a deeper level of consultation is warranted.

The Indigenous Consultation Report (ICR) was provided to the MEM on November 13, 2025. The ICR is also part of Enbridge Gas's evidence in this proceeding and is current as of October 15, 2025. The ICR summarizes Indigenous consultation activities, including logs and copies of communication documentation.

The ICR is being reviewed by the MEM. The MEM will determine whether the procedural aspects of consultation undertaken by Enbridge Gas are satisfactory. Determination by the MEM will be in a form of a Letter of Opinion to Enbridge Gas. Enbridge Gas is expected to file the MEM's Letter of Opinion with the OEB as soon it is received.

According to the ICR, two out of five potentially affected Indigenous communities have outstanding concerns (Chippewas of Kettle and Stony Point First Nation and Chippewas of the Thames First Nation).

Regarding capacity funding, Enbridge Gas noted in the ICR that it offered funding to each Indigenous community identified as potentially impacted by the Project. According to Enbridge Gas, capacity funding will support timely activities such as technical review of Project documents and engagement in meaningful consultation.

Enbridge Gas indicated that it would be continuing consultation with the Indigenous communities to address the outstanding concerns.

Questions:

- a) Please file an updated ICR and the Log of Consultation as of January 6, 2026. Please describe any new outstanding concerns Enbridge Gas identified and actions and plans to address these concerns.
- b) Please comment if Enbridge Gas has acquired, to date, any new information that warrants a deeper level of consultation than the low level identified by the MEM in the Delegation Letter.
- c) Please provide a narrative of an update on the progress of addressing outstanding concerns raised by Chippewas of Kettle and Stony Point First Nation and Chippewas of the Thames First since October 15, 2025. When is the next meeting or action regarding the consultation with these communities planned?
- d) In addition to updates to the ICR (Attachment 5) and Log of Indigenous Consultation (Attachment 6) please provide a list of all in-person or virtual meetings with each Indigenous community (and/or their representatives) including the dates and locations of the meetings and an overview of the issues and agenda addressed in each meeting. Include any action or follow-up agreed upon to be taken by Enbridge Gas and/or Indigenous community.
- e) Please provide a summary of all forms of accommodation that Enbridge Gas has committed and agreed to make or made to any of the consulted Indigenous communities in response to the concerns raised in the Indigenous consultation process for the Project.
- f) Please provide information on which Indigenous communities accepted and were provided capacity funding by Enbridge Gas as of January 6, 2026 and describe the activities supported by the capacity funding that was provided.

- g) Please advise if any Indigenous communities raised concerns with Enbridge Gas with respect to the capacity funding being offered and if so, how Enbridge Gas responded to such concerns.
- h) Please advise if any of the Indigenous communities identified in the Delegation Letter have been consulted about work and engagement relating to Stage 1 Archaeological Assessment (AA) and/or Stage 2 AA. Please describe the consultation scope and outcomes.
- i) Please describe Enbridge Gas's format and scope of communication with MEM staff regarding the procedural aspects of consultation delegated to Enbridge Gas by the MEM for the Project since the outset of consultation.
- j) Please update the evidence with any correspondence between the MEM and Enbridge Gas since the application was filed regarding the MEM's review of Enbridge Gas's consultation activities. Please indicate when Enbridge Gas expects to receive a Letter of Opinion from the MEM.

Staff - 4

Ref.: Exhibit A, Tab 2, Schedule 1

Preamble:

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

Question:

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

If Enbridge Gas does not agree with any of the draft conditions of approval, please identify the specific conditions 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-2025-0293

PROPOSED CONDITIONS OF LICENCE

1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2025-0293 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. 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, and the rationale for taking such actions; and
 - v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) A Final Monitoring Report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - i. Provide a certification, by a senior executive of the company, of Enbridge Gas's adherence to Condition 4;
 - ii. Describe the condition of any rehabilitated land;
 - iii. Describe the effectiveness of any actions taken to prevent or mitigate any identified impacts during construction;

- iv. Include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. Include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, and 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); 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.3.0 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.