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Our File No.

May 8, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
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**RE: Enbridge Gas Inc. 2026 Storage Enhancement Project
OEB File No.: EB-2026-0082**

Dear Mr. Murray:

Please find attached the Interrogatories of the Ministry of Natural Resources.

Yours truly,

A handwritten signature in black ink, appearing to read "Demetrius Kappos", with a long, sweeping flourish extending to the right.

Demetrius Kappos
Counsel
Legal Services Branch

Copied via email to:

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Enbridge Gas Inc.
Application for Increase in Maximum Operating Pressure
Board File No. EB-2026-0082

Interrogatories of the Ministry of Natural Resources (“MNR”)

1. In the Applicant’s **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 6, para 20**, the Applicant makes reference to the fact that an engineering study was conducted by Geofirma Engineering Ltd. for each of the storage pools, and that the studies incorporated data from geomechanical and regional in-situ tests.

Interrogatories:

- a) Please confirm the title and date of completion of the referenced engineering studies.
- b) Please identify the timeframe for the data and in-situ tests that went into each engineering study.
- c) In reference to Clause 5.6.3 – Delta pressure from CSA Z341 Series:22, Storage of hydrocarbons in underground formations:
 - i. What are the discovery pressures for each of the 3 storage reservoirs?
 - ii. Do the above referenced engineering studies confirm reservoir integrity operating above the discovery pressures for the 3 storage reservoirs?

2. In the Applicant's **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 3, para 9**, the Applicant has indicated that with respect to the Dawn 156 Storage Pool, further to a review of well casings, wellheads, gathering pipelines and other related surface facilities, aside from pressure testing of well D 230 no other upgrades are required.

Interrogatories:

- a) Please confirm whether this is so from the vantage point of CSA Z-341.1-22 satisfaction.
 - b) Given no new emergency shut down vales are to be installed, why is this deemed unnecessary?
-
3. In the Applicant's **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 4, para 14**, the Applicant has indicated that with respect to the Bentpath Storage Pool, further to a review of well casings, wellheads, gathering pipelines and other related surface facilities, no upgrades are required.

Interrogatories:

- a) Please confirm whether this is so from the vantage point of CSA Z-341.1-22 satisfaction.
 - b) Given no new emergency shut down vales are to be installed, why is this deemed unnecessary?
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4. In the Applicant's **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 6, para 19**, the Applicant has indicated that with respect to the Rosedale Storage Pool, further to a review of well casings, wellheads, gathering pipelines and other

related surface facilities, aside from pressure testing of well D 230 no other upgrades are required.

Interrogatories:

- a) Please confirm whether this is so from the vantage point of CSA Z-341.1-22 satisfaction.
 - b) Given no new emergency shut down valves are to be installed, why is this deemed unnecessary?
5. In the Applicant's **pre-filed evidence at Exhibit D, Tab 1, Sch 1, pg 9, para 28C**, the Applicant indicates that the "What If" analysis conducted for each of the storage pools was done within the scope of CSA Z341.1-18. In the Applicant's **pre-filed evidence at Exhibit D, Tab 1, Sch 1, pgs 8-9, para 28B** regarding the assessment of neighbouring properties, the Applicant concludes that no impact to the integrity of the storage zone has been caused by the wells (both active and abandoned) located within 1 km and/or existing operations located within 5 km of the base of gas of the storage pools.

Interrogatories:

- a) In the course of the "What If" analysis, was consideration given to regulatory public safety and environmental requirements (e.g., under the *Occupational Health and Safety Act* and under the *Environmental Protection Act*)?
- b) Has the proposed increase in operating pressure at each of the subject storage pools been considered from a risk perspective with respect to the impacts to the environment and/or to public health and safety from uncontrolled surface and/or subsurface gas release?
- c) Did the assessment include a consideration of neighbouring activities, including potential implications of any anticipated changes to activities in surrounding storage pools?

- d) In the course of the “Assessment of Neighbouring Activities” assessments, please briefly describe what type of well information and documentation were reviewed.
 - e) Southwestern Ontario is known to have several undocumented wells. Did the assessment include the risk of an uncontrolled gas release occurring from undocumented wells within the neighboring properties?
6. In the Applicant’s **pre-filed evidence at Exhibit D, Tab 1, Sch 1, pg 7, para 26**, the Applicant confirms it has completed an Assessment of Neighbouring Activities per CSA Z341.1-22 Clause 5.2 and a “What If” analysis of hazards and operability (HAZOP) for the storage pools. There doesn’t appear to be any reference in the Applicant’s **prefiled evidence** to an updated Emergency Response Plan (ERP).

Interrogatories:

- a) Have the subject storage pools’ ERPs been reviewed and updated since the approval of the subject storage pools for gas storage? If so, please summarize those ERP update(s).
- b) If there have been updates to the ERPs, has this included a consideration of provisions addressing the notification of neighbours, the public and agencies in the event of an emergency (e.g., has contact information been updated)?
- c) When was the last ERP exercise carried out? Please offer a summary of the results of that exercise.
- d) Does Enbridge have formal communication plans with the other operators identified within the neighboring activities if they were to experience emergencies and/or other issues that may be related to the storage activities?

7. In the Applicant's **pre-filed evidence at Exhibit I, Tab 1, Sch 1, pg 1, para 4**, the Applicant acknowledges that as of the date of its application it had not yet filed an Indigenous Consultation Report (ICR) with the Ministry of Energy and Mines (MEM). The Applicant further acknowledges it intends to file with the OEB the anticipated MEM letter of opinion as to whether the Applicant's consultation has been sufficient ("letter of opinion").

Interrogatories:

- a) Does the Applicant confirm that it is prepared to adhere to the above if it is implemented in the form of a condition of approval?
 - b) Does the Applicant confirm that the granting of approvals should be held in abeyance until such time as a favourable MEM letter of opinion is obtained?
8. In the Applicant's **pre-filed evidence at Exhibit G, Tab 1, Sch 1, pg 1, para 3**, the Applicant acknowledges that it has yet to obtain all necessary permits, approvals and authorizations but that it expects to receive same prior to the commencement of drilling of the proposed UR 11 well.

Interrogatory:

- a) Does the Applicant confirm that it is prepared to adhere to the above if it is implemented in the form of a condition of approval?
9. In the Applicant's **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 11, para 31 and 32**, the Applicant indicates that it accepts responsibility for compliance with all relevant requirements under CSA Z341.1-22, the OGSRA and related regulations; and that all design, installation and testing of the proposed well will be in accordance with the requirements of the OGSRA, O.Reg. 245/97 and the OGSRA Standards v.3.0 and CSA Z341.1-22. Further, in the Applicant's **pre-filed evidence, at Exhibit D, Tab 1, Sch 1, pg 6, para 24**, the Applicant

indicates that it understands that the OEB will require the Applicant to conform to CSA Z341.1-22 to the satisfaction of the MNR.

Interrogatory:

- a) Does the Applicant confirm that it is prepared to adhere to the above if they are implemented in the form of conditions of approval?