

Ministry of Natural Resources
Legal Services Branch
438 University Avenue
19th floor
Toronto ON M5G 2K8

Ministère des Richesses naturelles
Division des services juridiques
438, avenue University
19^e étage
Toronto ON M5G 2K8



Direct Line: 416-254-7258

Filed VIA RESS & Courier

Our File No.

June 5, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

**RE: Enbridge Gas Inc. 2026 Storage Enhancement Project
OEB File No.: EB-2026-0082**

Dear Mr. Murray:

Please find attached the Written Submissions of the Ministry of Natural Resources.

Yours truly,

A handwritten signature in black ink, appearing to read "Demetrius Kappos", written over a light yellow rectangular background.

Demetrius Kappos
Counsel
Legal Services Branch

Copied via email to:

Evan Tomek, Sr Advisor, Regulatory Applications – Leave to Construct, Enbridge Gas Inc.

evan.tomek@enbridge.com

EGIRegulatoryProceedings@enbridge.com

Richard Lanni, Senior Legal Counsel, Enbridge Gas Inc.

richard.lanni@enbridge.com

Katy Field, Manager – Regional Operations, MNR

katy.field@ontario.ca

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

Written Submissions of the Ministry of Natural Resources (“MNR”)

Introduction

Enbridge Gas Inc. (“Enbridge”) has applied to the Ministry of Natural Resource (“MNR”) pursuant to the *Oil, Gas and Salt Resources Act* (“OGSRA”) to drill a natural gas storage well (well UR 11) in the Rosedale Storage Pool. Pursuant to s. 40(1) of the *Ontario Energy Board Act* (“OEB Act”) that application was referred to the Ontario Energy Board (“OEB”) where it is subject to this hearing along with the application by Enbridge pursuant to s. 38(1) of the OEB Act to vary (increase) the maximum operating pressure (“MOP”) of each of the Dawn 156 Storage Pool (“Dawn”), Bentpath Storage Pool (“Bentpath”) and Rosedale Storage Pool (“Rosedale”)(collectively, “the storage pools”).

Upon completion of drilling UR 11, Enbridge is also proposing to construct approximately 100 metres of new NPS 10 steel natural gas gathering pipeline to connect the well to the existing Rosedale gathering pipeline. MNR accepts that this new gathering pipeline does not meet any of the criteria for requiring leave to construct under the OEB Act. Also part of the project for Rosedale are the construction of a temporary drilling pad of approximately 3,600 m² and the construction of a 50 m permanent access road. MNR accepts that these installations are relatively minor and

necessary for the project. No additional physical installations are required as part of the project.

Further to Interrogatories and responses to Interrogatories, the MNR is hereby providing these Written Submissions.

Analysis

MNR Petroleum Operations Section has reviewed Enbridge's Application, Board Staff's Interrogatories (including the proposed conditions of approval), and Enbridge's Response to all interrogatories.

MNR is satisfied that Enbridge has offered a substantially complete response to all interrogatories.

Enbridge seeks authorization to increase its MOP for the storage pools to 17.64 kPA/m (0.78 psi/ft). MNR accepts that Enbridge has fully answered MNR's interrogatories pertaining to what studies and reports have been relied upon in support of this increased MOP and pertaining to the Assessment of Neighbouring Activities and "What If" analyses that were conducted in support of the project proposal.

MNR recognizes that a review of well casings, wellheads, gathering pipelines and other related surface facilities was completed by Enbridge for each of the storage pools, and that Enbridge has confirmed that all of Enbridge's natural gas storage wells in the storage pools currently have emergency shut down valves.

In its application, Enbridge confirmed that all design, installation and testing of the

proposed well will be in accordance with the requirements of the *Oil Gas and Salt Resources Act* (“OGSRA”), O.Reg. 245/97, the OGSRA Provincial Standards v. 3.0 (“the Provincial Standards”) and CSA Z341.1-22. We understand that Enbridge, in its application materials and per its response to interrogatories, more broadly also accepts the responsibility for compliance with the OGSRA and its related regulations (to which the Provincial Standards are incorporated by reference) to the satisfaction of the MNR, as imposed by way of a condition of approval.

Based upon the Application and the further information provided through Interrogatories, MNR has no objection to the Application’s approval subject to the Board Staff’s proposed conditions of approval and subject to the submissions below.

Indigenous Consultation

For this project proposal, the Ministry of Energy and Mines (“MEM”) by way of a letter dated Sept. 29, 2025 delegated to Enbridge the procedural aspects of the duty to consult five identified indigenous communities. There has been ongoing dialogue between Enbridge and these communities, with some matters in their discussions (as documented in Enbridge’s updated Indigenous Consultation Report) remaining outstanding.

MEM will determine whether the procedural aspects of Indigenous consultation are satisfied by providing a Letter of Opinion to Enbridge, which Enbridge intends to file in the proceeding once received. We understand that that final exchange has not yet happened.

MNR suggests that there is a need for a clear condition of approval that prohibits Enbridge from embarking on the physical aspects of the project proposal until such time as a MEM Letter of Opinion indicating that the duty to consult indigenous communities for this project

has been fully satisfied is filed with the OEB.

Conclusion and Relief Requested

MNR has no objection to approval of the Application under s. 38 of the OEB Act, subject to the OEB Staff's proposed conditions of approval and the suggested inclusion to the condition of approval described above. Pursuant to s. 40 of the OEB Act, MNR also welcomes a report concerning the applied-for well licence.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

DATED AT Toronto, this the 5th day of June, 2026.



Demetrius Kappos

Counsel | Ministry of Natural Resources Legal Services Branch/Civil Law Div.

Ministry of the Attorney General | Ontario Public Service

Tel.: 416-254-7258 | demetrius.kappos@ontario.ca