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BY EMAIL

June 9, 2026

Ritch Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritch Murray:

**Re: Ontario Energy Board (OEB) Staff Submission
Enbridge Gas Inc. (Enbridge Gas)
2026 Storage Enhancement Project
OEB File Number: EB-2026-0082**

In accordance with OEB's Procedural Order No.1, please find attached OEB staff's submission in the above proceeding. The attached document has been forwarded to Enbridge Gas Inc. and to all other registered parties to this proceeding.

Yours truly,

Randy Doradat
Advisor, Natural Gas

Encl.

c: All parties in EB-2026-0082



ONTARIO ENERGY BOARD

OEB Staff Submission

Enbridge Gas Inc.

2026 Storage Enhancement

Project

EB-2026-0082

June 9, 2026

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Introduction and Project Overview

On February 20, 2026, Enbridge Gas Inc. (Enbridge Gas) filed an application seeking the Ontario Energy Board's (OEB) approval for its 2026 Storage Enhancement Project (Project).

Enbridge Gas applied under the *Ontario Energy Board Act, 1998* (OEB Act) for:

1. Leave to vary (increase) the maximum operating pressure (MOP) of three storage pools under section 38(1) of the OEB Act
2. A favourable report to the Minister of Natural Resources (Minister) for drilling a natural gas storage well, pursuant to section 40(1) of the OEB Act

In this Project, Enbridge Gas seeks:

- Approval to increase the MOP of the Dawn 156, Bentpath, and Rosedale storage pools
- A favourable report from the OEB to the Minister to support its well licence application in respect of a proposed new well, referred to as Union Rosedale 11 (UR 11), in the Rosedale storage pool

The requested MOP increase and drilling of UR 11 is necessary to create additional storage capacity in the Pools and to increase the injection and withdrawal capability in the Rosedale Storage Pool, to meet growing market demands.^{1,2} The additional storage capacity and injection and withdrawal capability created by the Project will be sold to third parties as part of the Enbridge Gas unregulated storage portfolio.³

OEB staff supports Enbridge Gas's application and request for a favourable report to the Minister subject to receiving and considering the Ministry of Energy and Mines's Letter of Opinion and subject to the conditions that OEB staff has proposed for: 1. the approval to vary/increase the MOP of the pools, set out in Appendix A and 2. the well licence, set out in Appendix B.

¹ Exhibit B, Tab 1, Schedule 1, p.2, paragraph 5

² Exhibit A, Tab 2, Schedule 1, p.6, paragraph 14

³ *ibid*

Process

On January 14, 2026 the OEB received a letter from the Ministry of Natural Resources (MNR) advising the OEB that Enbridge Gas had filed a licence application to drill a new natural gas storage well within the Rosedale storage pool. The letter stated that as per section 40 of the OEB Act, the licence application is being referred to the OEB for a report.⁴

The OEB issued a Notice of Application on March 16, 2026. MNR applied for intervenor status. On April 27, 2026, the OEB issued Procedural Order No. 1 approving MNR as an intervenor. The OEB set out dates for the filing of interrogatories and submissions by MNR and OEB staff, and a reply submission. MNR and OEB staff filed written interrogatories by May 11, 2026. Enbridge Gas filed interrogatory responses on May 26, 2026.

On April 2, 2026 Jake Smit filed a letter of comment with concerns related to fire control, emergency protocol, safety and compensation for adverse effects. Enbridge Gas indicated that it replied to the letter on May 21, 2026.⁵

⁴ Exhibit D, Tab 1, Schedule 1, Attachment 17, p. 2

⁵ Response to Interrogatories STAFF-6

OEB Staff Submission

OEB staff's submission is structured to first address the following issues that are relevant to all components of the Project: project need and timing, costs and economics, environmental matters, land matters and Indigenous consultation.

The submission then addresses matters that relate more particularly to each of Enbridge Gas's two requests: to increase the MOP of the pools and for a favourable report to the Minister.

Project Need, Alternatives and Timing

Enbridge Gas stated that the Project is needed to increase the deliverability and storage capacity of the Pools in order to meet growing market demand for incremental storage space and injection and withdrawal capability.⁶

The Project will create an additional storage capacity of 45,000 10^3m^3 and increase storage design day withdrawal capability by approximately 788 $10^3 \text{ m}^3/\text{d}$ (31 TJ/d) to be sold as part of Enbridge Gas's unregulated storage portfolio.⁷

Enbridge Gas stated that for the current and next storage year (April 2026 to March 2028), it is fully contracted and has historically been fully contracted with respect to unregulated storage space and withdrawal capability. It stated that historically, the demand for unregulated storage far exceeds contracts awarded.⁸

Enbridge Gas proposed the Pools be in-service and operating at the proposed maximum pressure gradients in November 2026. Enbridge Gas stated that pressure testing of two wells is planned to occur June-August 2026 and is required by *Canadian Standards Associated Standard Z341.1-22 – Storage of hydrocarbons in underground formations* (CSA Z341.1-22). Enbridge Gas stated the proposed timing for pressure testing ensures the pool pressure remain below 5,500 kPa to allow for safe completion of the pressure testing.⁹

Enbridge Gas stated it plans to drill well UR 11 in April 2027, when the pressures of the Rosedale Storage Pool will be below 5,500 kPa. It stated that maintaining low pressure in the reef is crucial for effective well control, in accordance with the Oil, Gas and Salt Resources Act Standards v.3.0 and CSA Z341.1-22.¹⁰ It stated that the drilling will not cause any disruption to service from the storage pool. Enbridge Gas stated that a pipeline will be installed to connect the well to its gathering system, after the well drilling

⁶ Exhibit B, Tab 1, Schedule 1, p.2, paragraph 5

⁷ *ibid*

⁸ Exhibit B, Tab 1, Schedule 1, p.2, paragraph 6

⁹ Exhibit B, Tab 1, Schedule 1, p.2, paragraph 7

¹⁰ Exhibit H, Tab 1, Schedule 1, p.1, paragraph 3

is complete, and proposed well UR 11 to be in-service September 2027.¹¹

As per OEB CEO Policy 2026-01, in supporting the hearing and determination of matters by Commissioners, OEB staff shall identify those portions of *Energy for Generations, Ontario's Integrated Plan to Power the Strongest Economy in the G7 (June 2025)* (IEP) that are relevant to the matters in issue in the proceeding. In this application, in response to an interrogatory from OEB staff on this subject, Enbridge Gas referenced Chapter 5 of the IEP, "Important Role of Natural Gas". Enbridge Gas noted that this chapter stated the recognition of natural gas as a critical energy source and Ontario's commitment to continuing to support the role of natural gas in Ontario's energy system. Enbridge Gas stated its natural gas storage system is a critical part of the broader gas system infrastructure that the IEP recognizes "is key to our energy security and maintaining a stable supply to protect Ontario."¹² OEB staff agrees with Enbridge Gas that Chapter 5 of the IEP is relevant to this proceeding.

Alternatives – MOP Increase of Storage Pools

Enbridge Gas stated that the only way to physically increase storage capacity of underground storage reefs is to increase the MOP, allowing more gas to be stored in the reef. It stated it is unaware of any alternatives.¹³

Alternatives – Well Drilling Licence

Enbridge Gas referenced the Integrated Resource Planning (IRP) Framework that Enbridge Gas stated indicates it should identify potential system needs/constraints and describe these in the Asset Management Plan (AMP) to allow for examination of IRP alternatives (IRPA), and that the AMP addresses its regulated operations. Enbridge Gas stated the Project does not warrant further IRP consideration as it will be funded entirely by its shareholders as an unregulated storage asset. It stated that Unregulated projects are not included within the AMP and are therefore not subject to IRPAs.¹⁴

To increase the injection and withdrawal capacity of the Rosedale Storage Pool, Enbridge Gas identified two alternatives, (1) drilling a new natural gas storage well (selected alternative) and (2) modifying the diameters of the existing natural gas pipelines in the Rosedale gathering system. Enbridge Gas selected the first alternative as it believed it to increase injection and withdrawal capability the most, eliminated the need to blow down the Rosedale Storage Pool pipeline for a lengthy period, requires minimal land excavation and reduced footprint for construction and is the most economically feasible, amongst other reasons. It also stated this alternative has the least impact to the environment, landowners and Indigenous communities with interests in the area of the facility alternatives.

¹¹ Exhibit B, Tab 1, Schedule 1, p.3, paragraph 8

¹² Response to Interrogatories STAFF-7

¹³ Exhibit C, tab 1, Schedule 1, p. 4, paragraph 15,

¹⁴ Exhibit C, Tab 1, Schedule 1, paragraph 16, pp.4-5

Based on the above, OEB staff submits that there is demand for incremental unregulated storage capacity and withdrawal capability and therefore the Project is needed.

OEB staff accepts Enbridge Gas's position that there is no alternative to the MOP increase of storage pools.

With respect to alternatives for the well drilling, OEB staff submits Enbridge Gas's reasoning for exclusion from further IRP consideration is reasonable and in alignment with the IRP Framework. OEB staff agrees with Enbridge Gas that the selected alternative is optimal.

Project Cost and Economics

Enbridge Gas stated that the Project will be funded entirely by its shareholders as an unregulated asset forming part of its unregulated storage operations. Enbridge Gas stated all Project costs will be captured in unregulated accounts and its ratepayers will not incur any rate impacts.¹⁵

Enbridge Gas stated this is consistent with the OEB's findings in previous proceedings¹⁶ in which the OEB accepted its position.¹⁷

Enbridge Gas provided no cost or economics of the unregulated storage operations project citing the OEB's Decision and Order in the Natural Gas Electricity Interface Review proceeding.^{18,19}

Enbridge Gas stated that it will allocate 100% of Project costs to unregulated storage in accordance with the approved allocation methodology as part of the Decision on Settlement Proposal and Interim Rate Order on its 2024 Rebasing Application Phase 2 partial settlement proposal.²⁰ Enbridge Gas quoted from the partial settlement proposal, "any new additions adding storage capacity or deliverability, which will always be allocated 100% to unregulated storage."

OEB staff submits that it is appropriate that the Project costs be funded by Enbridge Gas's shareholders as it aligns with the 2024 Rebasing Application Phase 2 partial settlement proposal in that the Project consists of new additions adding storage capacity or deliverability, and therefore should be 100% allocated to unregulated storage.

¹⁵ Exhibit E, Tab 1, Schedule 1, p.1, paragraph 1

¹⁶ EB-2020-0256, EB-2021-0078 and EB-2024-0322

¹⁷ Exhibit E, Tab 1, Schedule 1, p.1, paragraph 2

¹⁸ EB-2005-0551

¹⁹ Exhibit E, Tab 1, Schedule 1, p.1, paragraph 3

²⁰ Exhibit E, Tab 1, Schedule 1, pp.1-2, paragraphs 4-6

Environmental Matters

Enbridge Gas retained Stantec Consulting Ltd. (Stantec) to complete an Environmental Report (ER) for the Project in accordance with the OEB's Environmental Guidelines.²¹

Enbridge Gas stated that the ER contains general mitigation and protective measures that it will adhere to. The ER concluded that potential adverse residual environmental and socioeconomic impacts of this Project are not anticipated to be significant, provided that the ER's recommendations are implemented, ongoing communication and consultation occur, and all permit, regulatory, and legislative requirements are adhered to.

Enbridge Gas stated that the ER was circulated to the Ontario Pipeline Coordinating Committee (OPCC), municipalities, relevant agencies, and Indigenous communities on December 8, 2025. Enbridge Gas filed the comments received on the ER along with subsequent responses as part of its evidence.²²

Enbridge Gas stated that a Cultural Heritage Memo²³ was prepared for the study area of UR 11 that concluded no impacts are anticipated to potential Built Heritage Resources and that no further cultural heritage studies are recommended.²⁴

A Stage 1 Archaeological Assessment (AA) was completed and determined that a Stage 2 AA is required.²⁵ Enbridge Gas stated it is planning to complete the Stage 2 AA in 2026, prior to the proposed well drilling in 2027.²⁶

Enbridge Gas indicated that consulted Indigenous communities received a draft of the Stage 1 AA report for review and Chippewas of the Thames First Nation (COTTFN) provided comments.²⁷ COTTFN requested participation in the Stage 2 AA for which Enbridge Gas stated it offered this participation.^{28,29}

OEB staff submits that Enbridge Gas has completed the ER in accordance with the OEB's Environmental Guidelines. OEB staff has no concerns about the environmental aspects of the Project, based on Enbridge Gas's commitment to implement the mitigation measures set out in the ER.

²¹ Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines in Ontario (2023)

²² Exhibit F, Tab 1, Schedule 1, Attachment 1, Appendix A.6

²³ Exhibit F, Tab 1, Schedule 1, Attachment 1, Appendix E

²⁴ Exhibit F, Tab 1, Schedule 1, p.4, paragraph 15

²⁵ Exhibit F, Tab 1, Schedule 1, Attachment 1, Appendix D

²⁶ Exhibit F, Tab 1, Schedule 1, p.5, paragraph 16

²⁷ Response to Interrogatories STAFF-5, attachment 3, pp. 1-5

²⁸ Response to Interrogatories STAFF-5, attachment 3, p. 4

²⁹ Response to Interrogatories STAFF-5 h)-i)

Land Matters

The Project requires the construction of a gravel pad, permanent access laneway and temporary workspace, all located on privately owned land, for the drilling of well UR 11. The proposed delta pressuring component of the Project has no land use requirements as there are existing permanent laneways and gravel pads to access the wells to be pressure tested.³⁰

Enbridge Gas stated that all necessary permits, approvals and authorizations will be obtained at the earliest possible opportunity and it expects to receive all required approvals prior to commencing drilling of the proposed UR 11 well.³¹

To connect well UR 11 to its gathering system, Enbridge Gas will construct an approximately 100 m long gathering line requiring temporary working space.³²

Enbridge Gas stated its land agents have engaged directly with stakeholders affected by the Project. It stated the landowner for the proposed site for well UR 11 and the associated gathering line has been contacted, preliminary discussions have been held and the landowner has not raised any concerns with the proposed work and granted Enbridge Gas permission to complete necessary environmental surveys.³³

Enbridge Gas stated it entered into an Oil and Gas Grant with the landowner which grants it permissions to drill wells, construct laneways on the property and construct pipelines. It also stated that E.B.O. 76 Reasons for Decision grants Enbridge Gas the authority to inject gas into, store gas in and remove gas from the Rosedale Storage Pool and to enter upon the lands to conduct these operations.³⁴

Well pressure testing is required as part of the proposed delta pressuring. Enbridge Gas stated that it has the right to conduct the necessary pressure testing as per an Oil and Gas Grant.³⁵

OEB staff submits that Enbridge Gas is appropriately managing land related matters. OEB staff has no issues or concerns with land matters related to the Project.

Indigenous Consultation

On July 22, 2025 in accordance with the OEB Environmental Guidelines, Enbridge Gas contacted the Ministry of Energy and Mines (MEM) in respect of the Crown's duty to consult related to the Project.³⁶

³⁰ Exhibit G, Tab 1, Schedule 1, p. 1, paragraph 1

³¹ Exhibit G, Tab 1, Schedule 1, p. 1, paragraph 2

³² Exhibit G, Tab 1, Schedule 1, p. 2, paragraph 6

³³ Exhibit G, Tab 1, Schedule 1, p. 3, paragraph 8

³⁴ Exhibit G, Tab 1, Schedule 1, p. 2, paragraphs 5-6

³⁵ Exhibit G, Tab 1, Schedule 1, pp. 2, paragraph 7

³⁶ Exhibit I, Tab 1, Schedule 1, Attachment 1

MEM, by way of letter dated September 29, 2025, identified five Indigenous communities to be consulted in relation to the Project and delegated procedural aspects of the consultation to Enbridge Gas (Delegation Letter)³⁷:

- Aamjiwnaang First Nation (AFN)
- Chippewas of Kettle and Stony Point First Nation (CKSPFN)
- Chippewas of the Thames First Nation (COTTFN)
- Oneida Nation of the Thames (Oneida)
- Bkejwanong Territory / Walpole Island First Nation (WIFN)

The MEM Delegation Letter indicates MEM's preliminary assessment of the level of consultation to be conducted by Enbridge Gas for each of the five Indigenous Communities and determined that consultation is owed at a low level for all five communities.

The Delegation Letter states that Enbridge Gas should inform the MEM if, during the consultation, information warranting a deeper level of consultation becomes available. In that instance, Enbridge Gas must contact the MEM for updated guidance.

On October 7, 2025 Enbridge Gas sent, via email, a Notice of Upcoming Project to the identified Indigenous communities.

The application includes an Indigenous Consultation Report (ICR), along with logs and copies of communication documentation, up to February 17, 2026.³⁸ Enbridge Gas stated that the ICR would be provided to MEM on or shortly after filing the application.

The MEM will form an opinion as to whether the procedural aspects of consultation undertaken by Enbridge Gas to-date for the purpose of the application for the Project have been sufficient. 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 once it is received. This Letter of Opinion will be considered by the OEB as part of its deliberations.

Enbridge Gas stated it served the OEB's Notice of Hearing to all the above-noted Indigenous communities, as directed by the OEB in its Letter of Direction ³⁹ for which its Affidavit of Service indicated was done on March 25, 2026⁴⁰.

In response to OEB staff interrogatories Enbridge Gas filed an updated ICR documenting the consultation as of May 19, 2026.⁴¹

Enbridge Gas stated it is unaware of any issues that could arise from the Project that could adversely impact constitutionally protected Aboriginal or treaty rights.⁴² The ICR

³⁷ Exhibit I, Tab 1, Schedule 1, Attachment 2

³⁸ Exhibit I, Tab 1, Schedule 1, Attachment 5 and Attachment 6

³⁹ Affidavit of Service, April 29, 2026

⁴⁰ Affidavit of Service, Exhibit D

⁴¹ Response to Interrogatories STAFF-5, Attachment 2

⁴² Response to Interrogatories STAFF-5 h)

summarizes concerns, issues and inquiries raised by the Indigenous communities during the consultation up to May 19, 2026. Concerns and comments that Enbridge Gas recorded and described in the ICR are mostly related to environmental impacts and mitigation. Enbridge Gas has committed to ongoing engagement with Indigenous communities in relation to the Project.⁴³

Enbridge Gas's mode of consultation with Indigenous communities includes emails, virtual meetings and in person meetings. According to a list of meetings provided by Enbridge Gas in response to OEB staff interrogatories, Enbridge Gas met virtually or in person with CKSPFN / Three Fires group, COTTFN and WIFN.⁴⁴

In addition to formal communication with the MEM that is documented on the record of the proceeding, Enbridge Gas meets monthly with MEM staff to discuss the status of consultation and Letters of Opinion on Enbridge Gas projects. Enbridge Gas noted that no formal minutes are taken for these meetings, but the meetings include discussion on topics of mutual interest related to Indigenous consultation.⁴⁵

Enbridge Gas stated that it expects a Letter of Opinion from the MEM near the end of the record for the proceeding.⁴⁶

On April 28, 2026 a Stantec representative emailed the five Indigenous communities on behalf of Enbridge inviting them to attend an ecological survey in May 2026. On May 15, 2026, a Stantec Representative emailed the five Indigenous communities on behalf of Enbridge Gas inviting them to attend an archaeology investigation later in May or early June.⁴⁷

Enbridge Gas offered capacity funding to each of the five Indigenous communities identified in the MEM's Delegation Letter. According to Enbridge Gas, capacity funding is typically used by Indigenous groups to support engagement activities related to the Project, including but not limited to the technical review of Project documentation, including the environmental report (ER) and archaeological assessment reports, participation in Project meetings, reviewing and responding to emails and assisting in assessing any significant sites within the Project area. WIFN and CKSPFN have been provided with capacity funding.⁴⁸ Enbridge Gas stated that no Indigenous community raised concerns related to the capacity funding being offered.⁴⁹

OEB staff observes that Enbridge Gas's consultation with the Indigenous communities is ongoing and that Enbridge Gas, in relation to the Project, has committed to continue engagement with the Indigenous communities.⁵⁰ OEB staff submits that, to the extent

⁴³ Response to Interrogatories STAFF-5 k)

⁴⁴ Response to Interrogatories STAFF-5 j)

⁴⁵ Response to Interrogatories STAFF-5 a)

⁴⁶ Response to Interrogatories STAFF-5 l)

⁴⁷ Response to Interrogatories STAFF-5, Attachment 2

⁴⁸ Response to Interrogatories STAFF-5 e)

⁴⁹ Response to Interrogatories STAFF-5 g)

⁵⁰ Response to Interrogatories STAFF-5 k)

that the Letter of Opinion may identify outstanding issues, the OEB could provide additional procedural steps to address these issues.

Request to Increase the MOP of the Pools

Other Work

Enbridge Gas stated that pressure testing of one natural gas storage well in each of the Dawn 156 and Rosedale storage pools is required to increase the MOPs and that no additional work is required to increase the MOP for the Bentpath Storage Pool.⁵¹

Enbridge Gas stated that the pressure testing of the wells required by code CSA Z341.1-22 does not require OEB approval.⁵²

Technical Requirements

Enbridge Gas requested approval to increase the MOPs in the Pools as follows⁵³:

Table 1:
Current and Proposed Maximum Pressure Gradients

Storage Pool	Current Gradient	Proposed Gradient
Dawn 156	17.2 kPa/m 0.76 psi/ft	17.64 kPa/m 0.78 psi/ft
Bentpath	17.19 kPa/m 0.76 psi/ft	17.64 kPa/m 0.78 psi/ft
Rosedale	17.19 kPa/m 0.76 psi/ft	17.64 kPa/m 0.78 psi/ft

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.”⁵⁴

Enbridge gas stated that testing results indicated that the clause referenced above is satisfied under the proposed MOP.⁵⁵

⁵¹ Exhibit A, Tab 2, Schedule 1, p.4, paragraph 9

⁵² Exhibit B, Tab 1, Schedule 1, p.2, paragraph 7

⁵³ Exhibit A, Tab 2, Schedule 1, p. 4, paragraph 8

⁵⁴ Exhibit D, Tab 1, Schedule 1, p.1, paragraph 2

⁵⁵ Exhibit D, Tab 1, Schedule 1, p.1, paragraph 3

Enbridge Gas stated its understanding is that the OEB will require it to conform to CSA Z341.1-22 to the satisfaction of MNR.⁵⁶

On July 8, 2025 Enbridge Gas met with MNR staff to present on upcoming projects including the Project.⁵⁷ On February 12, 2026 Enbridge Gas sent an email to MNR indicating that the following studies had been completed for each pool in compliance with CSA Z341.1-22 to support the application⁵⁸:

- 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

Executive summaries of the studies for each pool are included in the evidence in support of the application.⁵⁹ Enbridge Gas stated that it sent summaries of the studies to MNR and that it would make complete studies available in Enbridge Gas’s office, upon request, for MNR’s review.

In response to OEB staff interrogatories about updates on communication with MNR since filing the application, Enbridge Gas stated that there was no further communication with MNR on the Project. Enbridge Gas also said that it did not anticipate receiving further communication from MNR regarding compliance and the engineering and geological studies in its application. Enbridge Gas stated that in MNR’s written submission in a prior proceeding⁶⁰ related to Maximum Operating Pressure, MNR stated “*MNRF reminds Enbridge that, as the operator, Enbridge bears the responsibility for ensuring that all safety and environmental issues are addressed to ensure compliance with the Oil, Gas and Salt Resources Act, O. Reg. 245/97 and CSA Z341: Storage of Hydrocarbon in Underground Formations.*” Enbridge Gas acknowledged and accepted responsibility for compliance with all the relevant requirements under CSA Z341.1-22, the *Oil, Gas and Salt Resources Act* and related regulations.⁶¹

OEB staff observes that according to the evidence in this application the proposed maximum pressure gradients for the three pools are below the limit of 18.1 kPa/m, prescribed by Clause 5.6.2 (b) of CSA Z341.1-22. In addition, OEB staff notes that Enbridge Gas confirmed it would meet the requirements of CSA Z341.1-22, the *Oil, Gas*

⁵⁶ Exhibit D, Tab 1, Schedule 1, p.6, paragraph 24

⁵⁷ Exhibit D, Tab 1, Schedule 1, p.6, paragraph 25

⁵⁸ Exhibit D, Tab 1, Schedule 1, p.7, paragraph 26

⁵⁹ Exhibit D, Tab 1, Schedule 1, Attachments 10-12

⁶⁰ EB-2020-0074

⁶¹ Response to Interrogatories STAFF-1

and Salt Resources Act and related regulations.

Conditions of Approval

Enbridge Gas seeks leave to vary (increase) the maximum operating pressure of the Dawn 156 Storage Pool, Bentpath Storage Pool, and Rosedale Storage Pool (Pools). The Dawn 156 Storage Pool is subject to conditions of approval previously imposed by the OEB, limiting its MOP.⁶² Conversely, the Bentpath and Rosedale storage pools are not subject to such conditions of approval.^{63, 64}

Enbridge Gas proposed conditions of approval that it stated are in form and content similar to the conditions imposed by the OEB in its recent approval for increased MOP of its Kimball Colville and Bickford storage pools.⁶⁵

OEB staff notes that should the OEB approve Enbridge Gas's request to increase the MOP of the Pools based on its assessment that the Project is needed, the OEB Act permits the OEB, when making an order, to "impose such conditions as it considers proper".⁶⁶

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

OEB staff also proposes a condition of approval that would require Enbridge Gas to comply with the relevant requirements of CSA Z341.1-22 to the satisfaction of MNR. This condition was applied in the Decision and Order in the application for approval to

⁶² EB-2016-0322, Decision and Order, April 13, 2017, Schedule 1. The current condition (imposed upon Enbridge Gas's predecessor, Union Gas Limited) states:

Union Gas Limited shall not operate the Dawn 156 storage pool above a pressure representing a pressure gradient of 17.2 kPa/m (0.76 psi/f) of depth without leave of the Board. Union Gas Limited shall provide summaries of an engineering study and geological study in support of any leave application and a formal confirmation from the Ministry of Natural Resources and Forestry that operating the pool at the increased operating pressure complies with the requirements of the CSA Z341 standard.

⁶³ Exhibit A, Tab 2, Schedule 1, paragraph 4, p.2

⁶⁴ EB-2012-0391, Report of the Board, December 20, 2012. Enbridge Gas stated it is not aware of any OEB condition of approval limiting the MOP of the Bentpath and Rosedale storage pools. Enbridge Gas stated that in its December 20, 2012, Report of the Board, the OEB stated the following regarding the MOP of the Bentpath and Rosedale storage pools:

Union noted that its request will result in an increase in the maximum operating pressure for the Bentpath Pool of 330 kPa and an increase in the Rosedale Pool of 310 kPa. Union stated that these increases are within the limits as prescribed by the CSA Z341.1-10 code. Union noted that the current maximum operating pressure gradient of the Pools is 16.51 kPa/m, and the pools have been operating at this pressure since 2001. In the Application, Union proposed to operate the Pools at 17.19 kPa/m. Union noted that it plans to begin operating the Pools at the higher pressure gradient during the 2013 injection season. Union noted that there are no existing Conditions of Approval for these Pools which limit the maximum operating pressures in the Pools.

⁶⁵ EB-2024-0322, Decision and Order, Schedule A.

⁶⁶ OEB Act, section 23

increase the maximum operating pressures of the Kimball-Colinville and Bickford natural gas storage pools⁶⁷. In response to MNR interrogatories, Enbridge Gas confirmed that it is prepared to accept a condition of approval adhering to this.⁶⁸

Draft proposed conditions approval is attached as Appendix A to this submission.

Well Licence Application

Enbridge Gas applied to the Minister for a licence to drill a new gas storage well (UR 11) in Rosedale storage pool.

Facilities

Enbridge Gas stated that it must construct a temporary all-weather gravel drilling pad of approximately 3600 m². Following completion of drilling, an approximately 96 m² permanent gravel pad and an approximately 5 m x 50 m permanent access laneway to the well site are expected to remain, and Enbridge Gas stated that the remainder of the temporary drilling pad area will be remediated to the landowner's satisfaction.⁶⁹

Enbridge Gas plans to install approximately 100 m of pipeline to connect well UR 11 to the existing Rosedale gathering system and it stated this pipeline does not meet criteria for requesting leave to construct.

OEB staff submits that the construction of the proposed facilities is appropriately planned.

Technical Requirements

MNR is the provincial authority that ensures all of the relevant requirements of CSA Z341 for drilling, modifications, and operation of these wells are satisfied. Enbridge Gas has provided MNR with the following reports on the pool for their review: (i) What If" analysis of hazards and operability (HAZOP) for the storage pool (ii) Assessment of Neighboring Activities for the storage pool as prescribed by CSA Z341.1-22 Clause 5.2.; and (iii) Engineering studies completed by Geofirma Engineering Ltd.

In response to OEB staff interrogatories about updates on communication with MNR since filing the application, Enbridge Gas stated that there was no further communication with MNR on the Project. Enbridge Gas also said that it did not anticipate receiving further communication from MNR regarding compliance with CSA Z341.1-22.⁷⁰

⁶⁷ EB-2024-0322

⁶⁸ Response to Interrogatories MNR-9

⁶⁹ Exhibit C, Tab 1, Schedule 1, paragraphs 7 and 9, pp. 2-3

⁷⁰ Response to Interrogatories STAFF-2

Enbridge Gas acknowledged and accepted responsibility for compliance with all the relevant requirements under CSA Z341.1-22, the *Oil, Gas and Salt Resources Act* and related regulations.⁷¹

OEB staff supports Enbridge Gas's request for a favourable report to the Minister on the well licence application subject to the inclusion of the proposed conditions of licence set out in Appendix B, in the OEB's report to the Minister.

Conditions of Approval

As part of its interrogatories, OEB staff proposed conditions with respect to the well licence, that are similar to those recommended by the OEB in Enbridge Gas's 2026 Kimball-Colinville Storage Pool Well Drilling Project⁷² and sought comments from Enbridge Gas. In its response, Enbridge Gas stated that it has no concerns with regard to the conditions of licence proposed by OEB staff.⁷³

~All of which is respectfully submitted~

⁷¹ Response to Interrogatories STAFF-1

⁷² EB-2025-0293, Report to the Minister of Natural Resources, March 19, 2026, Attachment A

⁷³ Response to Interrogatories STAFF-8

Appendix A
OEB Staff Submission

Draft Conditions of Approval

Request to Increase the MOP of the Pools

Application under Section 38(1) of the OEB Act**Enbridge Gas Inc.****EB-2026-0082****DRAFT CONDITIONS OF APPROVAL**

1. Enbridge Gas Inc. shall not operate the Dawn 156 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.
2. Enbridge Gas Inc. shall not operate the Bentpath 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. Enbridge Gas Inc. shall not operate the Rosedale 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.
4. For the purpose of increasing the Maximum Operating Pressure in the Dawn 156 Storage Pool, the Bentpath Storage Pool and the Rosedale 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.

Appendix B
OEB Staff Submission

Draft Conditions of Licence

Well Licence

Application under Section 40 of the OEB Act**Enbridge Gas Inc.****EB-2026-0082****DRAFT CONDITIONS OF LICENCE**

1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2026-0082 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 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.3 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.