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VIA EMAIL and RESS

November 28, 2023

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No. EB-2023-0271
Bluewater and Mandaumin Well Drilling Project
Interrogatory Responses**

In accordance with the OEB's Case Information Letter, dated October 30, 2023, enclosed please find Enbridge Gas's interrogatory responses for the Bluewater and Mandaumin Well Drilling Project.

The above noted submission has been filed electronically through the OEB's RESS and will be made available on Enbridge Gas's website.

If you have any questions, please contact the undersigned.

Sincerely,

(Original Signed)

Evan Tomek
Advisor, Leave to Construct Applications

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

Exhibit C, Tab 1, Schedule 1, Page 2
Exhibit D, Tab 1, Schedule 1, Page 5

Preamble:

Enbridge Gas noted that the Project will commence with the construction of temporary all-weather gravel drilling pads in Fall 2023 and Spring 2024. Enbridge Gas also noted that drilling must be complete by June 1, 2024, or the Project will be deferred to 2025.

Question(s):

- a) Please comment on how the proposed construction timeline would be impacted if Enbridge Gas obtains the required permits, approvals or authorizations for only one of the well drilling sites before June 1, 2024.
- b) Please explain why one temporary all-weather gravel drilling pad will be constructed in Fall 2023 and the other in Spring 2024.

Response:

- a) Enbridge Gas has obtained all other required permits, approvals, and authorizations required for the drilling of the wells at the Bluewater and Mandaumin sites. Enbridge Gas is planning to drill the wells in April 2024 and May 2024.

To meet construction timelines, Enbridge Gas respectfully requests that a favourable report from the OEB for both proposed observation wells be provided to the MNRF as soon as possible and preferably by March 1, 2024. In Enbridge Gas's experience, drilling licences are typically issued three to four weeks after an OEB Decision. This timeline ensures Enbridge Gas has adequate time to complete the drilling of the two wells with no disruptions to service from the Bluewater and Mandaumin Pools.

Scheduling the drilling of Mandaumin and Bluewater wells together creates cost synergies by reducing the mobilization and demobilization costs for the drilling rig by up to \$1 million. If a favourable report from the OEB for the drilling of both proposed

observation wells is not received by March 1, 2024, the drilling of one or both of wells will have to be deferred to 2025 due to this increase in cost and to avoid disruption to service from the Bluewater and Mandaumin Pools.

- b) At the time the well drilling application was submitted to the OEB on October 6, 2023, Enbridge Gas planned to construct the temporary all-weather gravel drilling pads in fall 2023 and spring 2024 for UBW3 and UMD8, respectively. This plan was due to the phased approach of the archaeological assessments of the two sites to accommodate harvest time frames. The archaeological assessment for the Bluewater site was completed at the time of filing, and the Mandaumin archaeological assessment was in progress and therefore it was anticipated that the temporary all-weather gravel drilling pads for UBW3 and UMD8 would be completed in fall 2023 and spring 2024, respectively.

The archaeological assessments for both the Bluewater and Mandaumin sites have now been completed and accepted by the Ministry of Citizenship and Multiculturalism and therefore both temporary all-weather gravel drilling pads can be constructed in fall 2023. Enbridge Gas commenced the construction of the UMD8 temporary all-weather gravel drilling pad in October 2023 due to delays related to crop harvesting at the Bluewater site. Upon completion of the temporary all-weather gravel drilling pad for UMD8, construction of the temporary all-weather gravel drilling pad for UBW3 will commence. It is anticipated that the access road and drilling pads for both sites will be completed in 2023. Please see the response at Exhibit I.STAFF-2 for more information regarding the archaeological assessments.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

Exhibit G, Tab 1, Schedule 1, Page 4

Preamble:

Enbridge Gas stated that the combined Stage 1-2 Archeological Assessment (AA) Report for the Bluewater well drilling site was completed in July 2023 and accepted by the Ministry of Citizenship and Multiculturalism (MCM) in the Ontario Public Register in August 2023.

Enbridge Gas stated that a combined Stage 1-2 AA Report for the Mandaumin well drilling site was to be completed and submitted to MCM in the Ontario Public Register in October 2023 and that the Cultural Heritage Evaluation Report (CHER) for the Project was to be completed and submitted to the MCM in October 2023.

Question(s):

Please provide an update on the Stage 1-2 AA for the Mandaumin well drilling site and the CHER for the Project.

Response:

The combined Stage 1-2 AA Report for the Mandaumin well drilling site was completed in October 2023 and recommended no further assessment. This report was accepted by the MCM into the Ontario Public Register of Archaeological Reports on October 17, 2023 under Project Information Form #P1048-0131-2023.

The CHERs for the Bluewater well drilling site and Mandaumin well drilling site were submitted to the MCM on October 11, 2023 and October 13, 2023, respectively. The CHER for each site found that the given properties do not have local cultural heritage significance and as a result of the evaluations, a heritage impact assessment was not recommended.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff (STAFF)

Interrogatory

Reference:

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 Ministry of Natural Resources and Forestry (MNRF) recommending the issuance of the well licences and may also recommend certain conditions.

Question(s):

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 the MNRF on well drilling applications.

If Enbridge Gas does not agree with any of the draft conditions of approval, please identify the specific condition(s) 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-2023-0271
PROPOSED CONDITIONS OF LICENCE**

1. Enbridge Gas Inc. (Enbridge Gas) shall rely on the evidence filed with the OEB in the EB-2023-0271 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 by 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 9(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; 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 1;
 - 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, the rationale for taking such actions.

11. For the purposes of these conditions, Enbridge Gas shall conform with:

- a) CSA Z341.1-18 "Storage of Hydrocarbons in Underground Formations" to the satisfaction of the Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNR); 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.2 to the satisfaction of the MNDMNR.

Response:

Enbridge Gas has no objections to the draft conditions of licence proposed by OEB staff.

Enbridge Gas notes that condition 10 a) i. and condition 10 b) i. both state the following:

“Provide a certification, by a senior executive of the company, of Enbridge Gas’s adherence to Condition 1;”

Enbridge Gas would like to confirm if this is accurate, or if condition 10 b) i. should be confirming adherence to another condition (i.e., Condition 4).

Enbridge Gas also notes that the OEB references CSA Z341.1.18 and the Ministry of Northern Development, Mines, Natural Resources and Forestry. Enbridge Gas confirms that CSA Z341.1.22 and the Ministry of Natural Resources and Forestry are the correct references.