

Enbridge Pipelines Inc.  
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May 25, 2009

**VIA COURIER & ELECTRONIC FILING**

Ms. Claudine Dutil-Berry  
Secretary  
National Energy Board  
444-7<sup>th</sup> Avenue SW  
Calgary, AB T2P 0X8

Dear Ms. Dutil-Berry,

**Re: Response to National Energy Board Information Request No. 1  
dated May 19, 2009, for Enbridge Pipelines Inc. Section 58 Application  
for the Interpipe Delivery Fund Corridor Expansion**

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Attached for filing electronically, please find the response of Enbridge Pipelines Inc. to Information Request No. 1 of the National Energy Board.

If you have any questions concerning this response, please contact Lisa Anderson, Regulatory Lead at (780) 420-8766 or at [lisa.anderson@enbridge.com](mailto:lisa.anderson@enbridge.com).

An electronic copy of this response will be served on those parties indicated on Enbridge's Section 58 Interested Parties list and all Mainline shippers.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Jennifer Nichols', is written over the typed name and title.

Jennifer Nichols  
Senior Regulatory Counsel  
Law & Regulatory Affairs, Liquids Pipelines

Att.

LA/bjb

**Enbridge Application dated April 30, 2009  
Interpipe Delivery Fund Corridor Expansion**

**1 - Socio-economic Matters**

Topic: Municipal Consultation

- 1.1 Reference:**
- (i) Enbridge Application, Applicant Self Assessment of Risk, Consultation, C8
  - (ii) Correspondence from Strathcona County to Enbridge Pipeline Inc. dated April 14, 2009 - Comments on Construction Projects at Enbridge Edmonton Terminal. OF-Fac-Oil-E101-2009-03 01
  - (iii) NEB Filing Manual, Section 3.3: Consultation

**Preamble:**

In reference (i), Enbridge indicates that “All potentially affected Municipalities have been consulted and there are still some outstanding concerns.”

In reference (ii), Strathcona County states that it does not support the NEB-regulated construction InterPipeline delivery expansions or the Plains Midstream corridor due to concerns with fire detection and suppression. Strathcona County indicates that they require the following:

1. A Road-Use Agreement to be in place prior to the commencement of the project;
2. Recognition that daily clean-up of mud tracking is the developer’s responsibility;
3. Traffic control at the worksite;
4. A development permit and a building permit for the new prefabricated electrical building to be installed for the InterPipeline Fund Corridor Expansion;
5. Resolution of concerns with the automated fire detection and foam dispersion/fire suppression systems at the terminal; and,
6. Commitment to following standard conditions and recommendations concerning emergency services.

Reference (iii) provides information concerning the filing requirements for consultations. It states that applicants should demonstrate that any concerns raised by stakeholders have been considered, and addressed as appropriate.

**Request:**

Please provide the following:

- a) an update of the consultation with Strathcona County officials regarding their concerns;

- b) an update on the outcomes of the consultation; and,
- c) file with the Board confirmation that each of the required permits and/or agreements have been obtained.

**Response:** In a letter to the County of Strathcona dated May 5, 2009 (copy attached), Enbridge committed to the installation of a fixed-foam fire suppression system for Tanks 32 & 35 at its Edmonton Terminal. Enbridge received a letter from the County dated May 14, 2009, stating "Strathcona County Emergency Services is satisfied that Enbridge will fulfil this commitment, and thus has no further concerns with the proposed plans other than the stated recommendations and conditions." A copy of the County's May 14, 2009 letter is attached. Enbridge's proposal for addressing the recommendations and concerns of the County is set out in Enbridge's response to the County dated May 15, 2009, which is also attached.

## **2 - Financial/Economic Matters**

Topic: Third Party Notification

- 2.1 Reference:**
- (i) Enbridge Pipelines Inc. application dated 30 April 2009, Third Party Notification - EC5/EC6
  - (ii) NEB Filing Manual, Section 3.3: Consultation and Section A.3.4: Financing

**Preamble:** In reference (i), Enbridge indicates it had not notified all affected third party shippers and commercial parties prior to submitting its application but that it would at the time it filed the application.

Reference (ii) provides information concerning the filing requirements regarding consultation of affected parties. The Board indicates that third party notification should be made prior to submitting an application and that a summary of concerns, if any, along with the plans to address those concerns accompany the application.

**Requests:** Please indicate to the Board whether all third parties have subsequently been notified and what concerns have been raised, if any.

**Response:** Enbridge Mainline Shippers and Section 58 interested parties have been served with the Interpipe Delivery Fund Corridor Expansion application and no concerns have been raised.

John M. Gerez, P.Eng.  
Vice President  
Engineering & System Integrity



May 5, 2009

File Number: A30.01.01/25

Lori Mills  
Energy Exploration Liaison  
Strathcona County  
2001 Sherwood Drive  
Sherwood Park, AB T8A 3W7

Dear Ms. Mills:

**Re: Enbridge Pipelines Inc. Edmonton Terminal, Tanks 32 & 35**

Enbridge Pipelines Inc. ("Enbridge") confirms that, as requested, it will install fixed foam fire protection systems on each of Tanks 32 and 35 at its Edmonton Terminal. The system will be remotely activated by the operators upon confirmation of a fire situation. It is expected that these fire suppression facilities will be in place by November, 2009.

Enbridge's decision to comply with the County of Strathcona's request in this regard was influenced by Enbridge's commitment to a culture of safety and its practice of cooperating with reasonable provincial and municipal requirements. In acceding to the County's request in relation to its fire protection facilities Enbridge neither admits nor attorns to the jurisdiction of the municipality. Enbridge's Mainline is a federal work that complies with federal legislation and is often not subject to provincial and municipal laws. Further, Part 17 of the *Municipal Government Act* (Alberta) and municipal bylaws do not apply where a development is effected for the purpose of a pipeline or an installation or structure incidental to the operation of a pipeline.

We trust this will resolve the County of Strathcona Emergency Services concerns noted in your letter of April 14, 2009.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Gerez', with a long horizontal flourish extending to the right.

John M. Gerez, P.Eng.  
Vice President  
Engineering & System Integrity

cc: Claudine Dutil-Berry, National Energy Board  
Dinah Canart, Heartland Hall Contact Office, Strathcona County, [canart@strathcona.ab.ca](mailto:canart@strathcona.ab.ca)  
Ken Jones, Emergency Services, Strathcona County, [jones@strathcona.ab.ca](mailto:jones@strathcona.ab.ca)  
Monica Popp, Transportation and Agriculture Services, Strathcona County, [popp@strathcona.ab.ca](mailto:popp@strathcona.ab.ca)  
Naomi Tichkowsky, Heartland Hall Contact Office, Strathcona County, [tichkowsky@strathcona.ab.ca](mailto:tichkowsky@strathcona.ab.ca)

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ENGINEERING AND ENVIRONMENTAL PLANNING

File: 8360  
Energy Sector - General

May 14, 2009

Enbridge Pipelines Inc.  
10201 Jasper Avenue  
Edmonton, AB T5J 3N7

Attention: John M. Gerez  
Vice President, Engineering and System Integrity

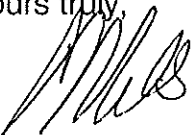
Dear Mr. Gerez:

Strathcona County has received your letter of assurance that fixed foam fire protection systems will be installed on each of the Tanks 32 and 35 at the Enbridge Edmonton Terminal. Strathcona County Emergency Services is satisfied that Enbridge will fulfill this commitment, and thus has no further concern with the proposed plans other than the stated recommendations and conditions.

Once your plans for the proposed foam systems are developed, please contact Dale Miller, Fire Marshall, at 780-449-9651 to discuss the systems, installation, water supply and timelines.

If you have any further questions or concerns please contact me at 780-416-6739 or Ken Jones at 780-464-8457.

Yours truly,



Lori Mills  
Energy Exploration Liaison

pc: Deputy Chief Ken Jones  
Fire Marshall Dale Miller

Enbridge Pipelines Inc.  
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Mahesh Patel  
Project Management  
Tel: 780 420 8539  
Fax: 780 233 6620  
mahesh.patel@enbridge.com



May 15, 2009

File Number: 10969 8360

Ms. Lori Mills  
Strathcona County  
2001 Sherwood Drive  
Sherwood Park, AB  
T8A 3W7

Dear Ms. Mills:

**Re: Enbridge Pipelines Inc. ("Enbridge")  
Interpipe Diluent Delivery Project ("Project A"), Plains Midstream Connection ("Project B"), and Interpipe Fund Corridor Expansion ("Project C")  
collectively, the "Edmonton Terminal Construction Projects"**

Enbridge is writing to respond to the issues raised in your correspondence dated April 14, 2009. Given all of the industrial and energy industry work being conducted in Strathcona County, we appreciate your attention to the Edmonton Terminal Construction Projects and look forward to working with you through each construction phase.

The format of this letter will be as follows: the County's issue/question will be stated, followed by Enbridge's response in italics.

**1. Transportation and Agriculture Services Comments**

- 1.1 A Road Use Agreement must be in place prior to the commencement of your program or project. Please ensure the Transportation and Agriculture Services office at 780-417-7100 is provided a minimum of five (5) business days notice to make the appropriate arrangements.
- 1.2 Daily clean-up of mud tracking is developer's responsibility.
- 1.3 Traffic control at the work site is imperative, i.e., warning signs of trucks turning, speed limits, etc. Please provide a copy of your Temporary Traffic Control plan to Strathcona County, refer inquiries to Colin Pullishy, Transportation and Agriculture Services at 780-417-7100. (For information regarding appropriate work zone signage, see the *Manual of Uniform Traffic Control Devices for Canada*.)

***Response to 1.1 to 1.3:***

*Enbridge confirms it will obtain the necessary Road Use Agreements prior to transporting heavy and wide loads and will be responsible for daily cleanup of mud tracking. Enbridge will submit a Temporary Traffic Control Plan to the County prior to construction.*

**2. Development Services Comments**

- 2.1 No comments with respect to Project A and Project B. Project C – Inter Pipeline Fund Corridor Expansion indicates that a new prefabricated electrical building will be installed. Please note that a development permit and a building permit will be required for this structure.

**Response:**

*Enbridge will obtain a development permit and a building permit for the installation of a new prefabricated electrical building for the Inter Pipeline Fund Corridor Expansion project.*

**3. Emergency Services Comments**

- 3.1 Emergency Services is unable to support the application for three NEB-regulated construction projects at the Enbridge Edmonton Terminal until such time as we have satisfactorily resolved our concerns with the automated fire detection and foam dispersion/fire suppression systems at this terminal.

**Response:**

*As set out in our letter to you dated May 5, 2009 (a copy of which is included for ease of reference), Enbridge confirms it will install a fixed foam fire protection system on each of Tank 32 and 35 at its Edmonton Terminal. The system will be remotely activated by the operators upon confirmation of a fire situation. It is expected that these fire suppression facilities will be in place by November, 2009.*

- 3.2 Please advise emergency services, through 9-1-1, at any time you are notifying the public of a Level 1, 2, or 3 emergency.

**Response:**

*Enbridge confirms it will advise emergency services, through 9-1-1, any time it notifies the public of a Level 1, 2 or 3 emergency.*

- 3.3 Please ensure your crews can provide exact location and site access instructions to 9-1-1 should assistance be required.

**Response:**

*Enbridge will have safety representatives working on the Project, who will ensure that all construction crews will be advised of the protocol for obtaining emergency assistance, and they will be able to provide the exact location and site access instructions should 9-1-1 assistance be required.*

- 3.4 Please ensure continuous compliance with all applicable public safety and emergency response requirements at the Federal (e.g. NEB, CEPA), Provincial (e.g. TDG) and ERCB Directives (e.g. D-71, D-56).

**Response:**

*Enbridge will comply with all applicable Federal & Provincial public safety and emergency response requirements.*

- 3.5 Please note that all fires involving injury or property damage are reportable to Emergency Services. This includes fire damage to process equipment, fires contained to the lease/property, or fires that may have been suppressed by company personnel. It specifically includes fires suppressed through the use of automated shut-down/suppression systems and when Emergency Services was not called to respond.

**Response:**

*Enbridge confirms it will report all fires involving injury or property damage to Emergency Services, including those specifically noted in 3.5 above.*

- 3.6 Your company should be a member in good standing with a spill response cooperative, with an established record of active participation by multiple employees in spill exercises and training (or equivalent).

**Response:**

*Enbridge is an active member of a number of spill response cooperatives including the Strathcona Industrial Association (SIA), Strathcona District Mutual Aid Program (SDMAP), and the Edmonton Area Pipeline and Utilities Operators Committee (EAPUOC). Enbridge regularly leads and participates in emergency response training and exercises both alone and in conjunction with these cooperatives.*

- 3.7 Please consult with Emergency Services regarding the location of Line Block Valves and/or other control measures where pipelines pass near Urban Service Areas.

**Response:**

*The Projects are all located within the Edmonton Terminal and therefore, do not involve any mainline block valves. All manifolds are designed to Enbridge Engineering Standards, which include control measures to ensure safe operation of the facilities*

- 3.8 Completion of an EOC and field deployment exercise within the preceding twelve calendar months by all personnel involved in the execution of the ERP is recommended.

*Enbridge maintains annual EOC exercise schedules. Exercises are aligned with NEB expectations. Various scenarios are used to ensure that different response methods are employed.*

*Enbridge has an ERP in place, and confirms it has and will continue to conduct various emergency exercises.*

- 3.9 It is recommended that the County's burn information line (780-464-8464) be utilized to determine the period when burning is permitted and correspond any pipeline welding activities accordingly. Establishment of a fire watch with extinguishment equipment/water is recommended.

**Response:**

*Enbridge will utilize the County's burn information line in conjunction with developing a construction plan and to manage required pipeline welding. A fire watch will be in place.*

**4. General Comments**

- 4.1 Please advise all of your sub-contractors and field persons about the comments and the names of those individuals to contact should they have any questions.

**Response:**

*Enbridge will incorporate this information into its Construction Execution Plan and organization charts will be posted in all construction trailers.*



- 4.2 This proposal has been reviewed by the Strathcona County Technical Review Group. The comments contained in this letter in no way negate the need to apply for the appropriate subdivision, rezoning and development permit applications. Please check with the Planning and Development Services Department at 780-464-8080 to ensure that no other approvals are required.

**Response:**

*Enbridge will ensure that any and all Strathcona County permits are in place prior to construction, including development permits, and building permits where and if required.*

- 4.3 For application forms, maps, engineering specifications, water testing labs, environmental consultants, and further information please refer to the Strathcona County website at [www.strathcona.ab.ca](http://www.strathcona.ab.ca) under "Energy exploration" and then "Industry information."

**Response:**

*Thank you for the information.*

I trust that the above information adequately responds to items raised by the County of Strathcona's review of the Edmonton Terminal Construction Projects. If you have questions regarding the above or any other aspect of the projects, please do not hesitate to contact myself at (780) 420- 8539.

Yours truly,



Mahesh Patel  
Project Management  
Enbridge Pipelines Inc.

cc:

Claudine Dutil-Berry, National Energy Board  
Dinah Canart, Heartland Hall Contact Office, Strathcona County, [canart@strathcona.ab.ca](mailto:canart@strathcona.ab.ca)  
Ken Jones, Emergency Services, Strathcona County, [jones@strathcona.ab.ca](mailto:jones@strathcona.ab.ca)  
Monica Popp, Transportation and Agriculture Services, Strathcona County, [popp@strathcona.ab.ca](mailto:popp@strathcona.ab.ca)  
Naomi Tichowsky, Heartland Hall Contact Office, Strathcona County, [tichowsky@strathcona.ab.ca](mailto:tichowsky@strathcona.ab.ca)  
Michele Perret, Manager, Government and Community Relations, Enbridge Pipelines Inc.  
Lisa Anderson, Regulatory Lead, Enbridge Pipelines Inc.