

Barry R. Scott, LL.B., ACCI., FCCI.
Wayne A. Petrie, B.A., LL.B.
Ian S. Wright, B.A., LL.B.
Jeffrey A. Bell, B.A.(Hons.), B.Ed., LL.B.
John D. Goudy, B.A.(Hons.), LL.B., B.C.L.
Erin M. Naylor, B.P.A., LL.B.
A. David Brander, B.A., LL.B. (1953-2011)

Suite 200 - 252 Pall Mall Street
London, Ontario N6A 5P6
Telephone: 519 433-5310
Facsimile: 519 433-7909

Ext 236
e-mail: jgoudy@scottpetrie.com

February 9, 2012

VIA ELECTRONIC FILING

Attention: Louise George, Acting Secretary
National Energy Board
444 – 7th Avenue SW
Calgary, AB
T2P 0X8

Dear Madam Secretary:

**RE: Application for Intervenor Status – Ontario Pipeline Landowners Association (OPLA)
Enbridge Pipelines Inc. Line 9 Reversal Phase I Project
Hearing Order OH-005-2011
Application File OF-Fac-Oil-E101-2011-01 01**

I am counsel for the Ontario Pipeline Landowners Association (OPLA). Please find enclosed OPLA's Application for Intervenor Status in the above noted proceeding.

We trust this is satisfactory.

Yours truly,
SCOTT PETRIE LLP
LAW FIRM



John D. Goudy

Encl.

c.c.: Ms. Chantal Robert, Enbridge Pipelines Inc., via email notification
Mr. Frank P. Durnford, Enbridge Pipelines Inc., via email notification



Application for Intervenor Status

Date: February 9, 2012

Proceeding Information

Project Name: Enbridge Pipelines Inc. Line 9 Reversal Phase I Project	
Hearing Order No: OH-005-2011	File Number: OF-Fac-Oil-E101-2011-01 01

Intervenor Information

Name: Marg Vance	Address: 885886 Oxford Cty. Rd. 8
Title: President	City: Bright
Organization: Ontario Pipeline Landowners Association	Province: ON
Telephone: (519) 454-8581	Postal Code: N0J 1B0
Facsimile: (519) 454-4069	Email: rottenturnips@hotmail.com
Address for Courier/Personal Service: (if different from mailing address)	
Address:	Telephone:

Authorized Representative Information

If you do not have an authorized representative, please leave blank.

Name: John D. Goudy	Address: 200-252 Pall Mall St.
Title: Lawyer	City: London
Organization: Scott Petrie LLP	Province: ON
Telephone: (519) 433-5310, ext. 236	Postal Code: N6A 5P6
Facsimile: (519) 433-7909	Email: jgoudy@scottpetrie.com
Address for Courier/Personal Service: (if different from mailing address)	
Address:	Telephone:

Issues and Interests

What is your specific interest in the proceeding?

The Ontario Pipeline Landowners Association (OPLA) represents Enbridge landowners in Ontario. Its members include landowners directly affected by the proposed Line 9 flow reversal. Enbridge landowners are concerned about the present condition of Line 9 and the possible consequences of a flow reversal including, but not limited to, integrity and contamination risks.

Do you or your authorized representative intend to appear at the public hearing?

Yes ☒ No ☐

If you do not intend to actively participate at the hearing, please state clearly the reasons why your interest in the proceeding requires an intervention.

n/a

Do you feel that your concerns are covered in the List of Issues included in the Hearing Order? If not, provide your suggested issues or amendment to an existing issue. Include a clear explanation of their relevance to the Hearing.

OPLA has no amendments or additions to propose at this time.

Access, Notification and Service

Which official language do you wish to use in correspondence with the Board and at the public hearing?

English ☒ French ☐

Documents submitted electronically are available on the Board's electronic document repository. If you have the capability to access the repository, the Board and other parties in this proceeding may serve you notification that a document has been filed and is available in the repository, instead of serving you a hard copy of the document.

Do you have the capability to access the Board's electronic document repository?

Yes ☒ No ☐

Participation at the Hearing

Intervenors wishing to give evidence must file their written evidence with the Board and serve a copy on all parties by the deadline for intervenor evidence indicated in the Timetable of Events in the Hearing Order.

Will you be filing written evidence?

Yes ☒ No ☐

Do you intend to question the Applicant or Intervenors on their evidence?

Yes ☒ No ☐

Do you intend to present a final argument at the end of the hearing?

Yes ☒ No ☐

Do you require a paper copy of the daily transcripts? (Note: You may view the transcripts through the Board's Internet site at www.neb-one.gc.ca)

Yes ☒ No ☐

Additional Comments

OPLA is concerned that the NEB's decision in Procedural Order No. 1 limiting the oral hearing to oral argument will deprive OPLA the opportunity to test Enbridge's evidence fully and adequately. Only through cross-examination of Enbridge and its representatives after the submission of evidence and responses to information requests will OPLA and its landowner members, not to mention the NEB itself, be in a position to question Enbridge on its application in a meaningful way. OPLA asks that the NEB reconsider its decision.

OPLA and its members also request that the oral hearing be held at a location in London, Ontario.