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January 15, 2008

Ms. Claudine Dutil-Berry
Secretary
National Energy Board
444 – 7th Avenue S.W.
Calgary, AB
T2P 0X8

Dear Ms. Dutil-Berry:

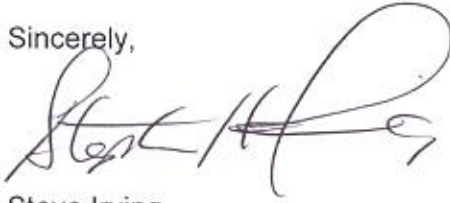
Re: National Energy Board (“NEB”) Draft Guidance Notes and Exemption Order for Decommissioning Projects under the *Onshore Pipeline Regulations, 1999* and *National Energy Board Processing Plant Regulations*

In response to the NEB’s letter of November 16, 2007, in which it invited comments on the draft decommissioning Guidance Notes and Exemption Order, Enbridge Pipelines Inc. (“Enbridge”) makes the following submissions.

- The definitions of “decommission” and “abandon” need to be clarified so that it is explicitly stated whether the choice of decommissioning/abandoning facilities in place and removing them rests with the company, or whether these facilities must always be demolished in order to be considered properly decommissioned or abandoned
- Clarification is required with respect to the relationship between the scope of the proposed Exemption Order for Decommissioning Projects and that of existing regulatory instruments such as section 58 of the NEB Act, the section 58 Streamlining Order and the Operations and Maintenance Requirements and Guidance Notes. For example, if a proponent were to replace part of an existing pipeline as an Operations and Maintenance activity, it is unclear whether the removal from service of the existing component must also proceed under the Exemption Order for Decommissioning Projects. In other words, it must be clarified whether the NEB intends the proposed Decommissioning Exemption Order to operate on a mutually exclusive basis with the various existing Exemption Orders and Guidelines that allow the replacement of pipeline components.
- The NEB should provide some direction on how facilities that were decommissioned prior to the introduction of the Guidance Notes and the Exemption Order are to be handled. The inclusion of transitional provisions in the Guidance Notes might assist in this task.

We thank the NEB for the opportunity to provide comments with respect to the proposed decommissioning amendments. Should the NEB wish to discuss these points further, please contact Donna Tribe by telephone at 780-420-8426 or by e-mail at donna.tribe@enbridge.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Irving', with a large, stylized flourish at the end.

Steve Irving
Director, System Integrity & Compliance

Cc:
Shaun Kavajecz
Donna Tribe
Ramona Salamucha