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A PROFESSIONAL CORPORATION
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TAMIKA A. HALE

PLUMMER SNYDER
(1900-1974)
HOWARD J. SOIFER
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July 12, 2006

Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Re: Thunder Bay Gathering Company
MPSC Case No. U-14672

Dear Ms. Kunkle:

Enclosed for electronic filing on behalf of Complainant in the above-captioned case are Official Exhibits I-1 and I-3. Also enclosed is an original Proof of Service.

Very truly yours

LOOMIS, EWERT, PARSLEY,
DAVIS & GOTTING, P.C.



Michael G. Oliva

Digitally signed by Michael
G. Oliva
DN: cn=Michael G. Oliva,
o=Loomis, Ewert, Parsley, Davis &
Gotting, P.C., c=US
Date: 2006.07.12 15:42:10
+0000
Location: atx

Michael G. Oliva

MGO/kmc

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of THUNDER)
BAY GATHERING COMPANY'S)
Application for authority to increase transportation)
rates on its THUNDER BAY PIPELINE)

Case No. U-14672

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
INGHAM COUNTY)

Karen Culton, being duly sworn, deposes and says that on the July 12, 2006, she served a true copy of **OFFICIAL EXHIBITS I-1 AND I-3** upon the attached service list by electronic mail.

 Karen Culton
Digitally signed by Karen Culton
DN: cn=Karen Culton,
o=Michigan Law Firm, c=US
Date: 2006.07.12
15:42:44 -0500
Location: office

Karen M. Culton

Subscribed and sworn to before me on
the 12th day of July, 2006.

 Jennifer Ottney
Digitally signed by Jennifer Ottney
DN: cn=Jennifer Ottney,
o=Michigan Law Firm, c=US
Date: 2006.07.12 15:43:28
Location: office

Jennifer L. Ottney
Ingham County, Michigan
Acting in the County of Ingham
My commission expires: 10/02/10

SERVICE LIST
MPSC Case No. U14672

Commission Staff
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Thunder Bay Gathering Company
DTE Energy Company
2000 2nd Ave #688WCB
Detroit, MI 48226
Middletonr@dteenergy.com

Hon. Daniel E. Nickerson, Jr. (P3624)
Administrative Law Judge
Michigan Public Service Commission
6545 Mercantile Way, Suite 7
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denicke@michigan.gov

Jennifer Evans
Case Coordinator, Case Management
Michigan Consolidated Gas Company
2000 2nd Ave
Detroit, MI 48226
evansj2@dteenergy.com

MPSC Case No. U-14672

Exhibit I-1

TERRILL J. MUNKRES, P.E.

46 Cedar Lane, Bridgeport, WV 26330 Home Phone: 304-842-2205 Office: 304-884-2192 email: tmunkres@ma.rr.com

Summary of Professional Experience

Active in the Petroleum Industry since 1977, with particular expertise in the following areas:

- Asset Management
- Reservoir Management
- Project Management
- Technical Supervision (facility, reservoir and production engineering)
- Property / Acquisition Evaluation
- Reserves Estimation
- Production Operations Supervision (oil and gas facilities)
- Business Plans

Key Skills and Strengths

Leadership

- Project leader, adept at coordinating multi-disciplined multi-national teams
- Skilled at mentoring and coaching junior engineers

Technical

- Economic analysis and evaluation of alternatives
- Volumetric, decline curve analysis, material balance
- Electric log and BHP build-up analysis
- Proficient with numerous PC applications

Interpersonal

- Extensive experience dealing with joint venture partners, contractors, vendors and government officials
- Team player. Active participant, good listener, innovative, willing to compromise

Personal

- Strong commitment to achieving results. Decisive. Quickly adapt to new situations. Highly self-motivated

Work History Summary

2004 to Present	Manager Reservoir Engineering Onshore. – Dominion E&P, Inc.
2002 to 2004	Sr. Project Mgr. – PetroChina International Jabung Ltd.
1999 to 2002	Project Director – Devon Energy Corp. (formerly Santa Fe Snyder Corp.)
1995 to 1999	Reservoir Engineering Manager – Santa Fe Energy Corporation
1992 to 1995	Division Engineer, Reservoir/Evaluation – Santa Fe Energy Corporation
1990 to 1992	Sr. Reservoir Engineer – Santa Fe Energy Corporation
1984 to 1990	Sr. Petroleum Engineer – Santa Fe Energy Corporation
1980 to 1984	Production Engineer - Reading and Bates Petroleum Company
1979 to 1980	Production Engineer - Energy Reserves Group, Inc.
1979 to 1979	Area Engineer - Texaco, Inc.
1977 to 1979	Field Engineer - Texaco, Inc.

Detailed Employment History

DOMINION RESOURCES EXPLORATION & PRODUCTION, INC.

Position: **Manager Reservoir Engineering Onshore**

Location: **Jane Lew, West Virginia**

Dates: **September 2004 to Present**

- Manager North East Gas Basin's reservoir engineering department.
- Coordinate annual reserve audit of over 7,000 producing wells and 2,000 PUD locations
- Evaluate strategic acquisitions in North-eastern US.
- Lead technical evaluation team on recently announced \$3.0 Billion CNR enterprise sale
- Prepare districts annual Lookback presentation and present same to executive management
- Assimilate forecasted expenditures from all districts in order to prepare annual and multi-year budgets and then forecast resulting production and economic metrics
- Review and recommend over 350 drilling well evaluations per year, in addition to workovers, recompletions, gathering and facility installations for conventional, CBM and Antrim Shale wells.

PETROCHINA INTERNATIONAL JABUNG LTD.

Position: **Sr. Project Manager, Betara Complex Development**

Location: **Jakarta, Indonesia**

Dates: **August 2002 to September 2004**

- Lead, direct and coordinate multi-disciplinary Project Management Team for \$500MM+ multi-phase onshore/offshore development project, Team includes Subsurface and Surface Facilities Groups consisting of twenty expatriates and forty Nationals.
- Project achieved Mechanical Completion Milestone on original contract schedule of 24 months, in addition to being under budget and below original contract value.
- During peak construction period over 3,500 contract personnel at work site, achieved 16 million man-hours onshore with no lost time accidents, one lost time accident offshore, no deaths.
- Develop Project Management Team organizational structure and recruit contract expatriate and Indonesian Nationals to add personnel with experience in required disciplines
- Maintain communications and obtain approvals of senior management, Joint Venture partners, PERTAMINA and Government of Indonesia (GOI) on project related issues
- Prepare and monitor budgets for project development

DEVON ENERGY CORPORATION (FORMERLY SANTA FE SNYDER CORPORATION)

Position: **Project Director, Betara Complex Development**

Location: **Jakarta, Indonesia**

Dates: **December 1999 to July 2002**

- Responsibilities the same as shown for Sr. Project Manager above
- Also, actively participated in the technical and commercial negotiations of the US \$9 billion gas sales contract with Power Gas Ltd. of Singapore
- Completed both Phase 1 and Phase 2 BCD projects under budget, both achieved simple payout within two and one half years of sanction

Position: **Reservoir Engineering Manager, Southeast Asia**

Location: **Jakarta, Indonesia**

Dates: **September 1995 to November 1999**

- Conceptualized and completed integrated multi-phase Plan of Development (POD) for Betara Complex. Presented POD to executive management, Joint Venture partners, PERTAMINA and GOI. Received approval from GOI in record time
- Led acquisition evaluation of \$250MM+ Thai Shell Upstream Companies, prepared presentation to executive management and participated in same
- Screened and evaluated expl. blocks and producing block acquisitions in S.E. Asia, visited data rooms, participated in negotiations and due diligence
- Coordinated preparation of PODs for all operated fields, including reservoir simulation, facility estimates, operating cost forecasts and economic evaluations
- Responsible for reserve adds to company internal system and for review of annual reserve appraisals by independent engineering consultants
- Supervised reservoir engineering department consisting of three expatriate and seven Indonesian National reservoir engineers

Position: **Reservoir Engineering Manager (Cont.), Southeast Asia**

- Responsible for development of Merak Worldwide PEEP economic model for Devon's Indonesian PSCs
- Developed production, capital and operating cost forecasts for all operated PSCs for quarterly plan updates

Position: **Division Engineer, Reservoir/Evaluation, Gulf Coast Division**

Location: **Houston, Texas**

Dates: **March 1992 to September 1995**

- Screened and evaluated offshore and onshore Gulf Coast acquisitions, visited data rooms, participated in negotiations and due diligence
- Supervised four reservoir engineers and one engineering technician
- Conducted field studies, evaluated drilling locations, prepared AFE packages and presented same to executive management
- Supervised quarterly division plan uploads into corporate system
- Responsible for reserve adds to company internal system and for review of annual reserve appraisals by independent engineering consultants
- Maintained ARIES database for all Gulf Division onshore and offshore producing properties

DEVON ENERGY CORPORATION (CONT.)

Position: **Sr. Reservoir Engineer, Mid-Continent Division**

Location: **Houston, Texas**

Dates: **January 1990 to March 1992**

- Evaluated Mid-Continent property acquisitions
- Conducted field studies, evaluated drilling locations, prepared AFE packages and presented same to executive management
- Participated in acquisition evaluation of \$100MM+ Adobe Resources, Inc.
- Reviewed and recommended recompletions
- Monitored reservoir performance of existing producing fields
- Actively participated in unitization meetings

Position: **Sr. Petroleum Engineer, Mid-Continent & Rocky Mountain Division**

Location: **Tulsa, Oklahoma**

Dates: **December 1984 to January 1990**

- Conducted field studies, evaluated drilling locations, prepared AFE packages and presented same to senior management
- Developed completion procedures
- Provided onsite supervision during critical completion operations including fracture treatments on deep, high-pressure gas wells
- Created POD for Minnelusa discovery, participated in unitization negotiations and initiated successful polymer augmented waterflood.
- Evaluated Company's CBM acreage, selected test well location and recommended same

READING & BATES PETROLEUM COMPANY

Position: **Production Engineer, Mid-Continent and Permian Basin Divisions**

Location: **Tulsa, Oklahoma**

Dates: **November 1980 to December 1984**

- Recommended procedures for all facets of production operations in Mid-Continent and Permian Basin Divisions, including completions, workovers, recompletions and equipment installations. The scope of the activity included analysis of decline curves, production reports, operating expenses, well records, electric logs, and all other related data to determine optimal procedures.
- Oversaw field production activities, provided daily direction to Production Superintendents.
- Monitored drilling wells to ensure optimal drilling conditions
- Prepared cost estimates and evaluated economic feasibility of proposed work
- Coordinated and prepared various state and federal forms; testified as expert to regulatory agencies

ENERGY RESERVES GROUP, INC

Position: Production Engineer, Kansas District

Location: Great Bend, Kansas

Dates: September 1979 to November 1980

- Submitted technical and economic analysis and recommendations regarding all facets of operations within the District. Principal areas of responsibility included recommending completion procedures, workovers, and recompletions; and working closely with field supervisors to ensure that equipment and procedures were optimal for prevailing conditions.
- Prepared drilling proposals for development wells, including AFEs, location selection, detailed economics, reserve estimates, cost estimates, drilling programs and completion recommendations.

TEXACO, INC.

Position: Area Engineer, Central Kansas District

Location: Great Bend, Kansas

Dates: July 1979 to September 1979

- Supervised two engineers, two engineering assistants and one well shooter. Responsibilities included distribution of assignments, initiating and reviewing workovers and monitoring secondary projects.

Position: Field Engineer, Central Kansas District

Location: Great Bend, Kansas

Dates: June 1977 to July 1979

- Responsibilities involved monitoring failures and preparing equipping estimates. Equipping estimates included: design of beam pumping equipment installations, submersible pumps, and fluid processing equipment. Prepared field studies and recommendation for expense, stimulation, and new reserve type workovers. Workovers included: casing squeezes, perforation of new zones, acid jobs, sand fracture treatments and nitrogen fracture treatments.
- Field duties included visiting critical workovers and sitting on development wells. Responsibilities for drilling wells included: correlating drill time logs, making lithological classifications of drilling samples, evaluating open hole logs and preparing completion recommendations.

Education

- **Bachelor of Science – Mechanical Engineering (1977)**
Kansas State University
Manhattan, Kansas

Activities and Honors: Dean's Honor Roll, Pi Tau Sigma (President), Maytag and Branson Memorial Scholarships

Professional Affiliations

- Society of Petroleum Engineers – Member since 1977
Chairman Great Bend Chapter 1980
- Registered Professional Engineer – State of Oklahoma – since 1985

MPSC Case No. U-14672

Exhibit I-3

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of THUNDER BAY)
GATHERING COMPANY'S)
Application for authority to increase)
Transportation rates on its THUNDER)
BAY PIPELINE)
_____)

Case No. U-14672

AFFIDAVIT

STATE OF MICHIGAN)
) ss.
COUNTY OF GRAND TRAVERSE)

John D. Snodgrass, being duly sworn, states:

1. I obtained a Bachelor of Science degree in Petroleum and Natural Gas Engineering from Pennsylvania State University in 1982. I have worked continuously in the natural gas industry in Michigan since graduation. For the past six years I have been employed by DTE Gas and Oil Company ("DGO") as Engineering Manager in the Traverse City, Michigan office. I served as the Chairman of the Michigan Section of the Society of Petroleum Engineers from 1988 to 1989.

2. I am the person responsible for providing the factual information set forth at pages 4 through 6 of the "DTE Gas & Oil Company's Objections and Answer to Subpoena for Production of Documents," dated June 23, 2006. ("Objections and Answer"). The factual information set forth in the Objections and Answers, including the information in the table on Page 5 thereof ("Reserve Estimates"), was taken from Annual Reserve Reports that were prepared for DGO by Ryder Scott Company, and kept by DGO in the course of DGO's regularly

conducted business activity, as stated in the Objections and Answer. I reviewed the factual information in the Objections and Answer, and confirm that it is accurate as compared to the information provided to DGO by Ryder Scott Company.

3. The Reserve Estimates represent both proven developed and proven undeveloped reserves, less fuel and shrinkage, for all projects in which DGO has a revenue interest that are dedicated for transportation to the Thunder Bay Pipeline ("DGO Projects"), except for the Doctors Club project, in which DGO has a revenue interest of less than 0.1%.

4. Column two of the table on page 5 of the Objections and Answer shows the production estimated for the next five years. Column three shows the total future reserves (including the five-year-total from Column 2) for the DGO Projects. Columns 2 and 3 include the interests of all parties in the DGO Projects, including DGO's interests. Column four shows DGO's weighted revenue interest in the total net reserves for the DGO Projects.

5. A list of the DGO Projects included in the Reserve Estimates is as follows:

Churchill Point	Comstock Hills	Flint Nappers
Highway 65	Holcomb Creek	Iron Oxide
King Edwards	Lost Lake Woods	Mother Hubbard
Net Worth	North Bay	Rust Road
Schmitt Creek Private	Scott Creek	Timber Wolfe
Schmitt Creek State	X-Rea	Zbart

6. If called as a witness, I could testify competently to the facts stated in this affidavit; however, DGO asserts and retains all objections, rights and privileges, and in particular with respect to its confidential information, as more fully set forth in the Objections and Answer, which are incorporated herein, and further asserted with respect to the subpoena dated July 13, 2006, which is not directed to a party or named witness, but instead is directed to the registered agent of non-party DGO.

John D. Snodgrass
John D. Snodgrass

State of Michigan)
County of Grand Traverse) ss.

Acknowledged before me in Grand Traverse County, MI, on the 12th day of July, 2006, as an authorized representative of DTE Gas and Oil Company subject to the limitations and objections above.

MARIE M. SCHWARTZ
Notary Public, State of Michigan
County of Grand Traverse
My Commission Expires 12-30-2011
Acting in the County of Grand Traverse

Marie M. Schwartz
_____, Notary Public
_____, County, _____
My Commission Expires: _____

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of THUNDER BAY)
GATHERING COMPANY's Application for) Case No. U-14672
authority to increase transportation rates on its)
THUNDER BAY pipeline.)
_____)

**DTE GAS & OIL COMPANY'S OBJECTIONS AND ANSWER TO
SUBPOENA FOR PRODUCTION OF DOCUMENTS**

On June 9, 2006, the intervening gas producers in this case (the "Producers")¹ issued a subpoena for DTE Gas and Oil Company ("DGO") to "produce any and all studies, investigation, or analysis undertaken by DTE or any affiliates, subsidiaries, or agents in the past five (5) years, of Antrim Reserves in the territory of Thunder Bay Pipeline, whether dedicated or not, including but not limited to Reports by Ryder Scott Co."

DGO incorporates by reference, for brevity, the filings and arguments made by Thunder Bay Gathering Company in response to the Producers' earlier requests for the documents and information at issue, including without limitation, the answers to Interrogatory No. 4, Thunder Bay Gathering Company's Response to Motion to Compel, dated May 12, 2006, and statements made at the May 16, 2006 motion hearing. DGO emphasizes that it objects to the subpoena because it is not a party to this case, it is not under common corporate control, although it is an affiliate of Thunder Bay Gathering Company, it is not subject to the Michigan Public Service

¹ The Producers' petition for leave to intervene in this case, ¶ 11, describes them as "natural gas producers and operators utilizing the Thunder Bay Pipeline for the transportation of Antrim gas. Collectively, the Producers, either directly, or through one or more of their respective subsidiaries and affiliates, are the shippers of approximately 33,500 Mcf per day on the Thunder Bay Pipeline, out of a total throughput of approximately 50,000 Mcf per day, or approximately 67% of the total current throughput of the pipeline."

Commission's ("MPSC") regulatory authority or jurisdiction, and therefore it cannot be compelled by the Producers to produce the requested documents or information in this MPSC case. DGO further objects to the extent that the subpoena purports to impose any duty on DGO greater or different in kind than that imposed, and limited, by the Michigan Court Rules, the constitutional, statutory and common law, and the Rules of Practice and Procedure before the MPSC; or to purportedly require DGO to produce anything beyond its information or control.

DGO also objects because the documents and information requested consist of confidential, proprietary, research and development, trade secrets, and/or commercial materials ("confidential information"), the disclosure of which would cause DGO competitive harm. For example and without limitation, DGO does business with the Producers, including the buying and selling of interests in gas fields that are the subject of the Producers' subpoena. Thus, the Producers are DGO's partners and competitors, and to the extent that the Producers seek information on specific gas fields, the Producers could utilize such specific information to generate a market value for certain gas fields to try and determine the lowest price that DGO would take to sell its interest(s) to the Producers and/or the highest price DGO would pay to buy the Producers' interest(s). DGO's competitors, such as the Producers, could use this information to their own advantage and DGO's corresponding disadvantage, for example, in setting prices, targeting potential sales and acquisitions, and planning for future market conditions. In addition, if this information were introduced into the public record, then the information would become available to additional third parties who could similarly use the information to DGO's competitive disadvantage. Moreover, to the extent that DGO's competitors know where DGO thinks gas reserves are located, those competitors could use that information, to DGO's disadvantage, to attempt to obtain leases for the affected properties and nearby properties. The

disclosure of such information to DGO's competitors would cause irreparable harm to DGO, since the information could not be retroactively retrieved or protected. The MPSC and the Courts have recognized the need for confidentiality in competitive markets. *See, for example, Residential Ratepayer Consortium v Public Service Comm*, 168 Mich App 476; 425 NW2d 98 (1987). Therefore, the documents and information must be maintained as confidential.

Moreover, requiring DGO to reveal its confidential information would constitute a taking. DGO has valuable property rights in its information that would be destroyed by a disclosure to its competitors. *See, In re Remington Arms*, 952 F2d 1029, 1032 (CA 8, 1991) (public disclosure of trade secrets will extinguish the owner's property rights); *Kubik, Inc v Hull*, 56 Mich App 335, 347; 224 NW2d 80 (1974). The Fifth Amendment to the United States Constitution provides that no person shall be deprived of property without due process of law and that private property shall not be taken for public use without just compensation.² Mich Const 1963, art 1, § 17 and art 10, § 2 contain similar protections, including the right to fair and just treatment in the course of legislative and executive investigations and hearings.

DGO further objects to the subpoena because on information and belief, the Producers keep confidential, and have not disclosed in connection with this case, the type of documents and information that they have requested from DGO. It is inappropriate for the Producers to use this proceeding to attempt to unilaterally obtain confidential information from DGO. In addition, there are contractual and/or regulatory provisions and obligations regarding confidentiality. For example, there is an agreement affecting these properties that requires well information be kept strictly confidential except to the extent that disclosure is required by law.

² The Fifth Amendment of the United States Constitution is applicable to the states pursuant to the Fourteenth Amendment, which also provides that no state shall deprive any person of property without due process of law.

DGO also objects because, on information and belief, the documents and information requested are not relevant, nor are they reasonably calculated to lead to the discovery of admissible evidence. MCR 2.302(B)(1). To the extent that such information may be relevant at all, the information that DGO provides below, without waiver of objections, gives the Producers all of the information that they need in connection with this case. Providing more specific information would not be more probative with respect to this case, and even assuming that there would be any relevance (which DGO denies), it would be substantially outweighed by the prejudice that would be caused to DGO. The subpoena is also overbroad and unduly burdensome since it seeks "studies, investigation, or analysis" for the past five years. The current year study is the most recent estimate, and prior years' actual production numbers are clearly more accurate than prior years' estimates. Furthermore, this actual information is, on information and belief, available to the public in governmental agency files or to the Producers from their own files, and therefore that information is equally, or more easily, available to the Producers.

Subject to these objections, and without waiving these objections, DGO answers as follows:

DGO obtains an annual estimate of the reserves, future production, and net income attributable to certain leasehold and royalty interests of DGO (the "Annual Reserve Report"). The Annual Reserve Report is prepared in accordance with the guidelines established by the Securities and Exchange Commission (the "SEC"). The Annual Reserve Reports for years ending December 31, 2001, December 31, 2002, December 31, 2003, December 31, 2004 and December 31, 2005 were all prepared by Ryder Scott Company in accordance with those SEC guidelines. Each year a new Annual Reserve Report is prepared using current data, as advised

by the SEC, and this new Annual Reserve Report is the most recent estimate of reserves. Therefore, the information provided in the chart below is derived from the most recent Annual Reserve Report, and the previous four reports, and includes both proven undeveloped and proven developed reserves, less fuel and shrinkage.

All DGO Projects <u>Dedicated to Thunder Bay</u>	In Mcfs Five Year <u>Sub-Total</u>	In Mcfs Total <u>Future</u>	DGO's Weighted Average Net Revenue <u>Interest</u>
December 31, 2001	40,971,447	126,138,000	61.8%
December 31, 2002	36,863,395	119,310,000	59.2%
December 31, 2003	32,093,385	100,393,000	58.5%
December 31, 2004	31,959,542	98,304,758	57.3%
December 31, 2005	30,588,342	105,176,149	58.0%

With respect to the underlying analysis, Ryder Scott Company's most recent Annual Reserve Report relevantly states as follows:

"Estimates of Reserves

The reserves included herein were estimated by the performance and analogy methods. The reserves estimated by the performance method utilized extrapolations of various historical data in those cases where such data were definitive in our opinion. Performance estimates accounted for [intentionally deleted] percent of the proved liquid hydrocarbon reserves and [intentionally deleted] percent of gas reserves. Reserves were estimated by the analogy method for the shut-in, behind pipe and undeveloped reserves. Reserves by analogy accounted for [intentionally deleted] percent of gas reserves.

The reserves included in this report are estimates only and should not be construed as being exact quantities. They may or may not be actually recovered, and if recovered, the revenues therefrom and the actual costs related thereto could be more or less than the

estimated amounts. Moreover, estimates of reserves may increase or decrease as a result of future operations.

Future Production Rates

Initial production rates are based on the current producing rates for those wells now on production. Test data and other related information were used to estimate the anticipated initial production rates for those wells or locations which are not currently producing. If no production decline trend has been established, future production rates were held constant, or adjusted for the effects of curtailment where appropriate, until a decline in ability to produce was anticipated. An estimated rate of decline was then applied to depletion of the reserves. If a decline trend has been established, this trend was used as the basis for estimating future production rates. For reserves not yet on production, sales were estimated to commence at an anticipated date furnished by DTE.

In general, we estimate that future gas production rates limited by allowables or marketing conditions will continue to be the same as the average rate for the latest available 12 months of actual production until such time that the well or wells are incapable of producing at this rate. The well or wells were then projected to decline at their decreasing delivery capacity rate. Our general policy on estimates of future gas production rates is adjusted when necessary to reflect actual gas market conditions in specific cases.

The future production rates from wells now on production may be more or less than estimated because of changes in market demand or allowables set by regulatory bodies. Wells or locations which are not currently producing may start producing earlier or later than anticipated in our estimates of their future production rates."

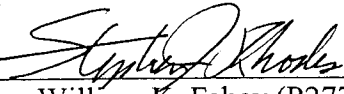
Respectfully submitted,

DTE GAS & OIL COMPANY

By: Wendy Ellis (P43958)
2000 Second Avenue
Detroit, MI 48226

FOSTER, SWIFT, COLLINS & SMITH, P.C.
Attorneys for DTE Gas and Oil Company

Dated: June 23, 2006

By: 
William K. Fahey (P27745)
Stephen J. Rhodes (P40112)
313 S. Washington Square
Lansing, MI 48933
(517) 371-8100

S:\141\SJR\DGO\Objections to Subpoena.doc

DTE Energy
2000 2nd Avenue, Detroit, MI 48226-1279

DTE Energy



MichCon

RICHARD P. MIDDLETON, ESQ.
Legal Department
(313) 235-3647

May 30, 2006

Michael G. Oliva, Esq.
Loomis, Ewert, Parsley, Davis & Gotting
232 S. Capitol Avenue, Suite 1000
Lansing, Michigan 48933

Re: In the matter of THUNDER BAY GATHERING COMPANY's Application
for authority to increase transportation rates on its THUNDER BAY pipeline
MPSC Case No. U-14672

Dear Mr. Oliva:

Enclosed is information received by Thunder Bay Gathering from its affiliate that was the subject of the Intervenor's Motion to Compel that was granted by the ALJ. Also included is a Proof of Service.

Very truly yours,

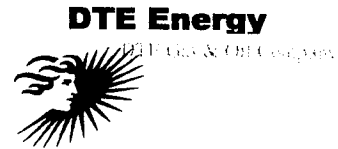
**Richard P.
Middleton**

Digitally signed by Richard P. Middleton
DN: cn=Richard P. Middleton, c=US,
o=DTE Energy, ou=Regulatory Affairs,
email=middletonr@dteenergy.com
Date: 2006.05.30 17:03:29 -04'00'

Richard P. Middleton

RPM/kbt
Enclosures
cc: Service list

DTE Energy Company
2000 Second Avenue, Detroit, MI 48226-1279



May 30, 2006

Mr. Richard Middleton
Michigan Consolidated Gas Company
2000 2nd Avenue
Detroit, Michigan 48226

Re: Thunder Bay Production Request

Dear Rich:

Enclosed please DTE Gas & Oil Company's ("DGO") formal response to your request to the interrogatory you forwarded to me on May 18, 2006. By providing this response, DGO does not waive any lawful objection it otherwise has to the production of this information, future requests for production of information or documents, or the use of the enclosed information, in MPSC Case No. U-14672 or any other legal proceeding in any venue.

Sincerely,

A handwritten signature in cursive script that reads "Wendy Ellis".

Wendy Ellis

Enclosure

c: Richard L. Redmond, Jr.

Interrogatory No. 4: Describe any studies, investigation, or analysis undertaken by Applicant or its affiliates or agents in the past five (5) years of the Antrim Reserves in the territory dedicated to the Thunder Bay Pipeline.

ANSWER:

DTE Gas & Oil Company ("DGO") objects to this interrogatory for the reasons that it is not a party to this litigation, it is not under common corporate control although it is an affiliate of Thunder Bay Gathering, it is not as a matter of law subject to regulation by the Michigan Public Service Commission, and therefore cannot be compelled through a third party (Thunder Bay Gathering Company) to produce documents or respond to interrogatories served on a third party in the course of MPSC litigation. In further objection, DGO states that Michigan Court Rule MCR 2.310(D) provides for requests for production of documents to nonparties. Thus, DGO has no legal obligation to provide the requested information because it has not been served directly with any request from Intervenor in MPSC Case No. U-14672 as required by MCR 2.310(D).

DGO also objects to this interrogatory for the reason that the information requested is not relevant, nor is it reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks descriptions of "studies, investigations, or analysis" for the past five years because the current year study is the most recent estimate. In addition, DGO objects for the reason that the information requested consists of confidential, proprietary, research and development of trade secrets, or commercial information, the disclosure of which would cause DGO competitive harm. Subject to these objections, and without waving these objections, DGO would answer as follows:

DGO obtains an annual estimate of the reserves, future production, and net income attributable to certain leasehold and royalty interests of DGO (the "Annual Reserve Report"). The Annual Reserve Report is prepared in accordance with the guidelines established by the Securities and Exchange Commission (the "SEC"). The Annual Reserve Reports for years ending December 31, 2001, December 31, 2002, December 31, 2003, December 31, 2004 and December 31, 2005 were all prepared by Ryder Scott Company in accordance with those SEC guidelines. Each year a new Annual Reserve Report is prepared using current data, as advised by the SEC, and this new Annual Reserve Report is the most recent estimate of reserves. Therefore, the information provided in the chart below is derived from the most recent Annual Reserve Report and includes both proven undeveloped and proven developed reserves, less fuel and shrinkage.

	In Mcf s 2006-2010 <u>Sub-Total</u>	In Mcfs Total <u>Future</u>	DGO's Weighted Average Net Revenue <u>Interest</u>
All DGO Projects Dedicated to Thunder Bay	30,588,342	105,176,149	58.0%

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of THUNDER)
BAY GATHERING COMPANY's Application)
for authority to increase transportation)
rates on its THUNDER BAY pipeline)

Case No. U -14672

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

ESTELLA BRANSON, being duly sworn, deposes and says that on the 30th day of May, 2006 she served a copy of information received by Thunder Bay Gathering from its affiliate that was the subject of the Intervenor's Motion to Compel that was granted by the ALJ along with a Proof of Service upon the parties listed on the attached service list via electronic mail.

Estella R.
Branson

ESTELLA BRANSON

Digitally signed by Estella R. Branson
DN: cn=Estella R. Branson, c=US,
o=Regulatory Affairs, ou=Detrolt Edison/
MichCon, email=bransone@dteenergy.com
Date: 2006.05.30 17:00:19 -04'00'

Subscribed and sworn to before
me this 30th day of May, 2006.

Karyn Beth Teal

Digitally signed by Karyn Beth Teal
DN: cn=Karyn Beth Teal, c=US, o=DTE Energy,
ou=Regulatory Affairs, email=tealk@dteenergy.com
Date: 2006.05.30 17:04:18 -04'00'

Notary Public

SERVICE LIST
MPSC CASE NO. U-14672
As of May 30, 2006

ADMINISTRATIVE LAW JUDGE

Hon. Daniel E. Nickerson, Jr.
Michigan Public Service Commission
6545 Mercantile Way,
Lansing, MI 48911
E-mail: denicke@michigan.gov

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