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February 22, 2005

Via E-mail Courier

Alberta Energy and Utilities Board
640 - 5th Avenue S.W.
Calgary, Alberta
T2P 3G4

Attention: Mr. Gary Perkins

Dear Mr. Perkins:

Re: Canadian Natural Resources Limited ("Canadian Natural")
Application No. 1341347
Application for Approval to Produce Gas
Chard Field
Athabasca Oil Sands Area

On behalf of Canadian Natural, we write regarding the time for filing Response Submissions and regarding a date for the final hearing.

In making this submission, Canadian Natural had regard for the following:

1. The timing imposed on previous Phases of the GB 2003-28 Proceedings;
2. The length of time required for preparation of the Regional Geological Study and the SSG Recommendations;
3. The time required for preparation of previous submissions made by Canadian Natural;
4. The nature of the submissions that Canadian Natural must respond to for the Final Hearing;
5. The number of wells, intervals and pools that Canadian Natural must respond to for the Final Hearing;
6. The length of time the participants in previous Gas Over Bitumen Hearings required to prepare and present their cases;
7. The complexity of the issues to be determined;



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8. The concerns over urgency have already been addressed through the phased approach implemented in GB 2003-28;
9. This is to be the "final" determination of the production status of the subject intervals; and
10. The predominant issue and complaint of affected parties regarding previous challenges to GB 2003-28 was that inadequate time to prepare for the case to be made against a particular party's interests had been allotted.

After considering the foregoing, Canadian Natural submits that the Final Hearing should not take place before the "Fall" of 2005 (the September to December period). Response Submissions would then be filed by the end of August or mid-September, 2005.

The submissions of February 14, 2005 to which Canadian Natural must respond include complex pressure studies, detailed numerical simulations, core studies involving hundreds of wells (166 SSG, 134 Nexen), and the re-pooling of numerous wells. As the Athabasca region is a winter-only access area, staff resources needed to evaluate these submissions are currently committed to the execution of Canadian Natural's 2005 drilling and operations programs. Canadian Natural requires sufficient time to fully evaluate these submissions and properly prepare a response. The timing proposed above will allow Canadian Natural to develop the full and complete arguments required for a final hearing, while not unduly delaying the process

In conclusion, we submit that such timing is reasonable and prudent in these circumstances having regard to the history of this matter and that urgent situations have been previously addressed by the interim proceedings provided for in the phased approach of GB 2003-28. Adoption of the above-noted timing will afford all affected parties a fair and reasonable opportunity to fully and properly prepare Response Submissions and ensure that the Board is provided with the best evidence to make its final determinations.

Yours truly,
THACKRAY BURGESS

Patrick J. McGovern

cc: Canadian Natural
cc: Interested Parties (via e-mail)