

**DELIVERED**

February 23, 2004

Douglas A. Larder  
640 – 5<sup>th</sup> Avenue SW  
Calgary, Alberta T2P 3G4

Dear Sir:

**RE: GENERAL BULLETIN 2003-28 (GB 2003-28)  
BITUMEN CONSERVATION REQUIREMENTS  
ATHABASCA WABISKAW-MCMURRAY  
PHASE 3 PROCEEDINGS**

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In response to your letter of February 13, 2004 the Board provides the following comments regarding the spreadsheet attached to your letter.

1. There appear to be discrepancies with the following wells:
  - a) Well 00/11-33-079-07W4/0 is not on the spreadsheet but is included on the list provided by Canadian Natural Resources Limited (CNRL);
  - b) Well 00/09-21-079-09W4/0 is not on the spreadsheet but is one of the 7 wells that were the subject of EnCana Corporation's counsel's letter of February 3, 2004 (the other 6 wells are on the spreadsheet);
  - c) Well 00/10-11-082-09W4/0 is not on the spreadsheet but was added to the list provided by Devon Canada Corporation (Devon) in its letter dated February 10, 2004;
  - d) Well 00/13-27-084-05W4/0 is not on the spreadsheet but Nexen Canada Ltd. included this well as one that needed clarification (regarding whether there was an error in the Staff Submission Group's January 26, 2004 report that identified the McMurray Channel zone as a zone that should be allowed to produce);
  - e) Wells 00/12-16-074-07W4/0 and 00/07-09-082-08W4/0 are on the spreadsheet but the unique well identifiers submitted by ISH Energy Ltd. and Devon were 00/12-16-074-07W4/2 and 00/07-09-082-08W4/2, respectively.

2. There appear to be discrepancies between the pay top and base depths shown on the spreadsheet and the perforated intervals provided by some of the objecting parties, as summarized on the following table.

Well ID	SSG interval		Objecting Party Interval		Objecting Party
	Pay Top	Pay Base	Perf Top	Perf Base	
00/03-09-079-07W4/0	301.0	302.7	303.5*	304.5*	CNRL
00/10-01-079-08W4/0	295.0	296.0	295.0 298.0*	296.0 299.0*	CNRL
			295.0	296.0	Paramount Energy Operating Corp. (Paramount)
00/10-02-079-08W4/0	299.8	301.0	299.6 302.5*	300.3 303.5*	CNRL
			299.6	300.3	Paramount
00/14-20-083-05W4/0	234.5	238.0	233.0* 234.0	233.8* 238.0	CNRL
00/11-32-083-05W4/0	210.0	212.7	209.6 213.0*	212.5 213.3*	CNRL
* intervals with apparent discrepancies					

Yours truly,

Gary D. Perkins  
Board Counsel

cc: Interested Parties