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Our File: 3691.64

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September 7, 2004

Gary Perkins, Board Counsel
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640 - 5 Avenue SW
Calgary AB T2P 3G4



**Re: Pre-hearing meeting
Proceeding No. 1347905: Phase 3 Proceedings
under Bitumen Conservation Requirements
Athabasca Wabiskaw-McMurray Area**


This submission is made by Petro-Canada in its own right, and as operator, and joint owner with Imperial Oil Resources Ltd., Japan Canada Oil Sands Limited and Nexen Inc. of certain Bitumen leases in the Athabasca Wabiskaw-McMurray area being considered in this proceeding.

Petro-Canada intends to participate in the hearing process, including the adducing of evidence, the cross-examination of witnesses and the submission of arguments.

In particular, Petro-Canada will be supporting the shut in of those wells recommended for shut in by the SSG during the interim hearing process. In addition, Petro-Canada will be advocating the shut in of those wells it recommended for shut in during the interim hearing process.

All of this is respectfully submitted this 7th day of September, 2004.

Field LLP



W.T. Corbett, Q.C.,
Counsel for Petro-Canada