



September 26, 2003

Mr. Andy Warren
Alberta Energy and Utilities Board
640 – 5th Avenue SW
Calgary, AB T2P 3G4

Dear Mr. Warren:

RE: MODIFICATION OF PRESSURE DATA COLLECTION PER GB 2003-28

Appendix 2 of GB 2003-28 entitled “ID 99-1 AMENDMENT”, stated under Section 4 “Pressure Data Requirements”, for the EUB designated Wabiskaw McMurray gas pools within or overlapping the application area, pressure surveys are to be conducted and submitted by November 1, 2003, from the greater of one well or 25 per cent of the wells in each pool. Also as stated within the same paragraph, “Variations from these requirements must be approved by the EUB”. In the subsequent letter of August 22nd, the Board clarified that it’s intent was to have pressures obtained for 25% of the wells completed in Wabiskaw McMurray gas pools.

A huge geological, engineering and logistical effort will be required to: (a) determine the total well count on a pool basis; (b) determine the correct number of surveys to take; and (c) determine in which wells they should be taken. Where more than one operator is involved on a pool by pool basis, performing this task will require negotiation and cooperation.

We respectfully suggest that the Board simplify this process by requiring each operator to satisfy the requirement for conducting pressure surveys in respect of Wabiskaw McMurray completed wells, by conducting pressure surveys in respect of 25% of the wells are set out on the well list Appendix 3, Schedule A of GB2003-28, that are operated by such operator. Each operator would be required to supply a total number of pressures of 25% of their total per pool well count.

e.g. Pool A – operator’s wellcount 10 wells: 2.5 pressures required
Pool B – operator’s wellcount 14 wells: 3.5 pressures required
Pool C – operator’s wellcount 12 wells: 3 pressures required

Operator’s total well count: 36: 6 pressures required, of which 2 are from Pool A, and 3 from Pool B, and 3 from Pool C.

Based on this well list, the obligations of each operator may be clarified. Determining the number of pressure tests per pool that a given operator is responsible for is easily done and audited .

In some areas the opportunity of collecting high quality pressure data will only be available after zonal isolation has occurred, which since most of this area is winter access only, will only be after January 1st 2004. CNRL respectfully requests a deferment of the November 1, 2003

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deadline for conducting and submitting the required pressure surveys until February 29th, 2004. This will not only allow us to achieve better quality pressure data, but also allow us to conduct these operations in an orderly manner.

If you have any questions, please contact Jane Mactaggart at 517-6846.

Yours truly,

CANADIAN NATURAL RESOURCES LIMITED

Lyle Stevens, P. Eng.
Senior Vice President Exploitation

cc: Terry Abel - AEUB