

Barristers & Solicitors
Patent & Trade-mark Agents

McCarthy Tétrault

McCarthy Tétrault LLP
Suite 3300, 421-7th Avenue S.W.
Calgary AB T2P 4K9
Canada
Telephone: 403 260-3500
Facsimile: 403 260-3501
mccarthy.ca

D. G. Davies

Direct: 403 260-3681

Assistant: Penny Goebel

Direct: 403-260-3662

E-Mail: pgoebel@mccarthy.ca

September 19, 2006

VIA EMAIL & COURIER

Imperial Oil
237 – 4th Avenue S.W.
Calgary, Alberta
T2P 0H6

Attention: Ms. Susan C. Stark

Dear Madam:

**Re: Application Nos. 1394112 and 1409180
Cold Lake Oil Sands Area – Clearwater Deposit**

Attached please find the information requests of EnCana Oil and Gas Partnership to Imperial Oil.

Yours very truly,

McCarthy Tétrault LLP

Original signed by

D. G. DAVIES

cc: Alberta Energy and Utilities Board
Attention: Mr. Ernie Smith

Alberta Energy and Utilities Board
Attention: Ms. Giuseppa Bentivegna

ALBERTA ENERGY AND UTILITIES BOARD

APPLICATION NOS. 1394112 and 1409180

COLD LAKE OIL SANDS AREA – CLEARWATER DEPOSITION

Information Requests of EnCana Oil and Gas Partnership
to Imperial Oil

1. **Reference:** Item 1 of the submission gives volumetric gas in place estimates for four gas pools.

Request: (a) Please provide the details for these estimates including how net pay, porosity, and water saturations were determined for individual wells and the pools.

 (b) Please provide a central type well location for each pool and provide an estimate of the approximate thickness and reservoir properties of the bitumen under each pool that Imperial believes is in communication with the gas pools.

 (c) Does Imperial have any pressure measurements in the bitumen zones under the gas pools?

 (d) Why was the E pool returned to production? Was it because Imperial determined that this would not adversely affect bitumen recovery or because there are no commercial bitumen reserves in pressure communication with the E pool? Please explain your answer.

2. **Reference:** In Item 3, Imperial supplies a figure titled “M&P Trunk 5 Original Pads”. In that figure two curves are labeled.

Request: Please provide a description of the remaining 4 curves.

3. **Reference:** In Item 4 Imperial states “No material changes in cumulative OSR performance were noted between the two groups of wells. This result is reasonable given that the fraction of the solution gas removed from the associated bitumen column as a result of the Clearwater gas production is expected to be small.”

- Request:**
- (a) Why would Imperial expect that only a small amount of solution gas would be removed from areas with no overlying gas, particularly in light of its comments in item 2?
 - (b) In this instance it would appear that field data indicates that depressuring of a gas cap has no measurable impact on bitumen recovery in areas offsetting the gas cap. Does Imperial have any field data that would contradict this conclusion?
 - (c) Please provide a list of the wells included in this review split by:
 - (i) CSS wells located adjacent to – but outside of – the zero edge.
 - (ii) CSS wells located one additional well spacing from the gas pools.