



BORDEN  
LADNER  
GERVAIS

Borden Ladner Gervais LLP  
Lawyers • Patent & Trade-mark Agents  
1000 Canterra Tower  
400 Third Avenue S.W.  
Calgary, Alberta, Canada T2P 4H2  
tel: (403) 232-9500 fax: (403) 266-1395  
www.blgcanada.com

**Randall W. Block, Q.C.**  
direct tel.: (403) 232-9572  
e-mail: rblock@blgcanada.com  
file no: 418038/111637

December 21, 2006

Alberta Energy and Utilities Board  
640 – 5 Avenue SW  
Calgary, Alberta  
T2P 3G4

Attention: Ernie Smith

Dear Mr. Smith:

**Re: EUB Application Nos. 1394112, 1409180 and 1481725  
Cold Lake Oil Sands Area – Clearwater Deposit**

In our letter dated December 8, 2006, we advised parties that Husky may be seeking further information from EnCana. Husky has since determined that such information is required and is consistent with the data and interpretations previously requested by EnCana and filed by Husky.

Please find attached 15 hard copies of the Husky's Information Requests to EnCana. Electronic copies are also being filed and served by email.

We thank the Board and EnCana in advance for their indulgence regarding these information requests.

Yours truly,

**BORDEN LADNER GERVAIS LLP**

Randall Block

cc:

Giuseppa Bentivegna, Alberta Energy and Utilities Board  
D.G. Davies, McCarthy LLP  
Patrick J. McGovern, Thackray Burgess  
Susan Anderson, Husky Oil Operations Limited  
Susan Stark, Imperial Oil Resources  
Jared Paddock, Canadian Natural Resources Limited

CALGARY • MONTREAL • OTTAWA • TORONTO • VANCOUVER • WATERLOO REGION

December 22, 2006

## Husky Information Requests to EnCana dated December 21, 2006

### Husky-EnCana-1

**Reference:** Gas-Over-Bitumen Reservoir Simulation Study Cold Lake Oil Sands Deposit (Clearwater Formation) 2006 Study, prepared for EnCana Oil & Gas Partnership by Kade Technologies Inc.

**Preamble:** EnCana has provided results of a simulation study of the cyclic steam stimulation (“CSS”) operations that have been conducted in the CNRL area. EnCana does not, however, provide the following basic data used in that simulation study for the following EnCana gas pools and the bitumen resources that are potentially influenced by those gas pools: CLWTR D, EE, S, G, CC, DD, B, and Undef. (collectively the “EnCana Gas Pools”).

Husky has provided comparable data and interpretations in its filings and wishes to understand the basis for EnCana’s evaluations.

### Request:

- (a) Provide calculations of original gas in place (“OGIP”) by (i) volumetric, (ii) material balance and (iii) decline methods for the EnCana Gas Pools. Tabulate all the input data used.
- (b) Provide all seismic data used in determining outlines of the EnCana Gas Pools.
- (c) Provide all non-public completion, pressure and production data for the EnCana Gas Pools.
- (d) Provide a map showing the edges of the EnCana Gas Pools, as well as the edges of each corresponding top water zones. Provide the data used to generate this map(s).
- (e) Provide calculations of the original bitumen in place (“OBIP”) within a 3 km influence radius of the EnCana Gas Pools in the Clearwater formation and a bitumen net pay map for those pools.
- (f) Provide calculations of OBIP for Husky oil sands lease Nos. 7188110343 and 718811A344 (the “Husky Leases”) and a bitumen net pay map. Provide the data used to generate this map(s).
- (g) Provide a facies and depositional model in the Clearwater formation for the area containing the EnCana Gas Pools and the affected bitumen.

December 22, 2006

- (h) Provide a discussion of any EnCana heavy oil/bitumen production experience in the Clearwater formation in the Cold Lake area. Provide calculations for the hydraulic diffusivity in the Clearwater formation for the Husky Leases.
- (i) Provide a shale isopach map within the 3 km radius around the combined area of the EnCana Gas Pools and the Husky Leases. Provide the data used to generate this map(s).
- (j) What is EnCana's definition of a "radius of influence"? Provide a calculation to determine the EnCana's radius of influence around the EnCana Gas Pools.
- (k) Provide EnCana's interpretation of the latest piezometer data provided by Husky on November 24, 2006.
- (l) Provide EnCana's geological mapping or cross-section with relevant well logs used to construct the flank model containing shale barrier (Figure E.6).
- (m) Provide core analysis and core photos for all EnCana gas wells in the Cold Lake area that are not currently publicly available.