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Objet :

A review of the Joint Panel's documentation has shown **ALBERTA ENERGY were not an invite to this process??** This is a giant mistake, since **NEED** is always the first consideration of well applications debated at a hearing!! Without Alberta Energy to explain and defend the current and future royalty rates for these 1275 Suffield wells, their need, based on public value cannot be determined!! Without public value able to be clearly defined license # 1435381 **certainly cannot be heard at this time!!** The concern with the royalty situation on Suffield wells was introduced very early in this proposal, and is indeed of such concern it is hard to understand the oversight of leaving the only Alberta Governmental body needed at this determination, off the invited list!! It is also not easy as an Albertan to understand why we have not had Alberta Energy address this panel, with respect to their ability to attend and as stated previously defend and point to any new royalty systems with respect to the changes at the NWA on Suffield!!

16-wells per section have been the stated maximum the Responsible Authority [RA] are prepared to allow on the NWA within Suffield. And 16-wells per section is the proposed well density by the proponent in it's Suffield proposal. That being the case, does it not follow that well applications follow a section by section routine to allow those inspecting drilling sites etc. to not have to revisit sensitive areas?? This of course would help with the RA determination of a gross of 16 well contained on any one section.!!

The establishment of 16 well clusters per section, also raises the question about **Alberta Provincial Royalties!!** Since the proponent will be allowed to drain the resource zone from 16 different locations on a section of crown land, should royalties not be also set by the cumulative gross of **16-wells per section?? My understanding is although there have been a 64-well clusters drilled on a section, royalties remain determined on single well basis???** This must be examined extensively as a Alberta Provincial matter, and license # 1435381 should have to be withdrawn or postponed to allow that Provincial matter to be examined!! Applications that will not bring the Grand-Total of wells to a section 16, must be determined the last licensing available for their individual sections, to again,stop duplication and repeated damage to their proposed locations!!

The secondary question, after cumulative effect to this pristine area, is of course both its need and public benefits. By allowing densities of 16 wells per section, but charging royalties on a single well basis under the provisions of the "**Low Productivity Well Allowance**" **EnCana are trying for benefits that should not be allowed!!**. **The ERCB as the Alberta agent seem satisfied to leave Alberta Energy far away from any questions related to this unholy issue!!** Alberta Energy must be questioned on the "Public Interest" in developing these wells before anyone is able to make a determination with respect to "The Public Interest"!! Although the provisions of the "Low Productivity Well Allowance" was "well meant" when it was introduced some years ago, allowing Natural gas that was selling at extremely low prices, to remain on stream from near depleted wells. **Never**, was the intention to allow large numbers of **new wells** to be drilled {16 wells per section} and get subsidized with this public royalty break!!

Certainly, the Environmental hearing may proceed, with the knowledge that "NEED" and "Public-Interest" issues are unsettled from a provincial standpoint!! Indeed, a determination of the proponents ambitions toward development of the National Wildlife Area may render the 3-well ERCB application useless. However, with the abilities of those opposed to the 3-well drilling application, unable to question and get answers from Alberta Energy, with respect to the

intended methods to be employed with regard to royalties, **License # 1435381 must be decided after the Environmental Review, if indeed that is a requirement at that time!!! for posting**

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