

October 29, 2014

National Energy Board of Canada
517 – 10 Avenue SW
Calgary, AB T2R 0A8

Attention: Sheri Young, Secretary of the Board

Re: Same Season Relief Well Technical Proceeding – Alternative Proposal Timing

In its September 4, 2014, letter to Imperial Oil Resources Ventures Limited (Imperial), the National Energy Board (the Board) provided an updated list of issues that will apply to a technical proposal for an alternative to meeting the same season relief well (SSRW) policy. Imperial has reviewed the Board's revised list of issues and clarifications, along with the accompanying frequently asked questions (FAQs), and reasserts its commitment to meet these requirements, so that the Board has the necessary information to proceed with a review and ruling.

As the Board has correctly stated, developing an alternative approach to meet or exceed the intended outcome of the SSRW policy is a highly technical undertaking. To address the Board's requirement to include a worst-case scenario (WCS) in the SSRW alternative submission, Imperial will need to identify input parameters for geology, reservoir engineering, drilling design and operations and logistics. Although this work is underway as part of the environmental impact statement and the operations authorization application, it will require a significant work effort and time to complete for the SSRW alternative submission. Therefore, Imperial expects to file its technical proposal for an SSRW alternative with the Board in Q3 2015.

In accordance with the Board's expectation that companies work collaboratively with northerners and northern institutions, Imperial will continue its communication and consultation efforts with the Inuvialuit on the development of its SSRW proposal and the WCS.

Sincerely,

Original signed by Rob Young on behalf of:

Sherry Becker
Beaufort/East Coast Opportunity Manager
Beaufort Sea Exploration Joint Venture

SB/dmg