



## Letter of Comment

Date: 10/4/2010 9:10:05 AM

### Proceeding Information

Project Name: <b>Spacing Requirements and Draft Guidance Notes - Onshore Northwest Territories</b>	Company Name: <b>Chevron Canada Resources</b>
Hearing Order No:	File Number: <b>Ad-GA-RG-COGDPR-02</b>

### Contact Information

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Please ensure that your letter of comment includes:

- the nature of your interest in the application
- comments on the application
- any relevant information that will explain or support your comments

For further information, please refer to the Hearing Order on the NEB website at [www.neb-one.gc.ca](http://www.neb-one.gc.ca).

### Comments

Attach additional pages if necessary.

<p><b>National Energy Board</b> <b>Well Spacing Units</b></p> <p><b>1. Page 1, Part III-Spacing Units</b> <input type="checkbox"/> Spacing units are relative to the subsurface location of the producing/completed zone.</p> <p><b>2. All Pages, "bottom-hole" location should be replaced with "subsurface" location since the completion interval may not be situated anywhere near the bottom-hole location.</b></p>
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## National Energy Board

### Comments on 'Draft Spacing Requirements and Draft Guidance Notes – Onshore Northwest Territories'

1. **Page 1, Part III-Spacing Units**
  - Spacing units are relative to the subsurface location of the producing/completed zone.
2. **All Pages, "bottom-hole" location should be replaced with "subsurface" location since the completion interval may not be situated anywhere near the bottom-hole location.**
3. **Page 3, part VI-Permitted Monthly Production Volumes and Off-target Area Penalty Factors.**
  - For Q<sub>pool</sub>, will any consideration be given to whether a productive well is horizontal or vertical? For example, if a third party drilled a vertical off-target in a pool with two high rate horizontal wells, the calculated production penalty factor for the vertical off-target well could be negligible or nonexistent, relative to its actual capability.
  - How is the daily production rate calculated? (Minimum flow period/ actual flared flow rate / calculated deliverability).
4. **Page 4, Section 21, part (a) and (b)**
  - If the completion interval *or portion thereof* is inside the off-target area: and,
  - If for example 10% of a horizontal well 's productive interval is inside of the off- target area, is the penalty factor modified (reduced by 90%) to reflect the relative amount of production coming from the off-target portion of the productive zone?

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## Letter of Comment

NEB/ONE

[Help](#)

### Thank you

The National Energy Board has received your submission.  
Your Filing Id is **A26583**.

You can view your submission on the National Energy Board's web site by [clicking here](#).

**Note:**

An acknowledgement of this submission has been sent to:

- Randy Dahlman rdah@chevron.com

**Important:**

The Hearing Order for this proceeding contains important information regarding the service of this submission on other parties. Please be sure to adhere to the directions of the Hearing Order.



Date Modified: 2008-12-13