



SAHTU Land & Water Board
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NEB/ONE

August 06, 2010

Anne-Marie Erickson
Secretary of the Board
National Energy Board
444 Seventh Avenue S.W.
Calgary, Alberta
T2P 0X8

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Ms. Erickson:

**Re: Draft Spacing Requirements for Comment
July 2010**

The Sahtu Land and Water Board is pleased to provide comments on the National Energy Board's **Draft Spacing Requirements**. Our staff have read and considered the information provided and would like to submit the following comments:

- 1) When discussing off-target areas, it should be mentioned that the targets are within the boundaries of the unit production block. This did not become clear until the figures are viewed and by stating the actual limitations of the off-target area there would be greater clarity.
- 2) While the SLWB staff have not had extensive experience with the NEB requirements, it appears that Requirement #16 may be cancelled out by requirement #18 as #18 states **any well**. It is not clear as to the differentiation of the production wells.

If you have any questions or concerns, please do not hesitate to contact me.

SAHTU Land & Water Board



Joan Gordey
Regulatory Director