

**Imperial Oil Resources Ventures Limited**

237 Fourth Avenue South West  
P. O. Box 2480, Station M'  
33-049 FAP  
Calgary, Alberta  
Canada T2P 3M9

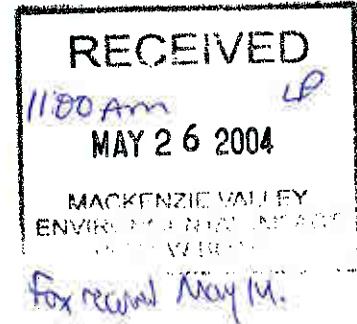
J.R. (Jim) Hawkins, P. Eng.  
Pipeline Regulatory Manager  
Mackenzie Gas Project

Tel. 403 237-2806  
Fax. 403 237-2073

13 May, 2004

Mackenzie Valley Environmental Impact Review Board  
P.O. Box 938  
5102 - 50th Avenue  
Yellowknife, NT X1A 2N7

Attention: Alan Ehrlich  
Senior Environmental Assessment Officer



Re: Draft Terms of Reference for the MVEIRB Environmental Assessment of Land Use Permit Application (MV2003F0045) and Water License Application (MV2003L8-0012): 2004 Winter Field Geotechnical Investigation Program - Deh Cho Region

Mr. Ehrlich,

Thank you for forwarding to me via fax on 7 May 2004 the public record of comment letters on the draft terms of reference for the environmental assessment of our proposed geotechnical investigation program in the Deh Cho. Included in that material was a letter from the Deh Cho First Nations Pipeline Working Group (PWG) dated 4 May 2004. Imperial Oil Resources Ventures Limited (IORVL) would like to restate our position on the terms of reference as originally outlined in my letter to you dated 30 April 2004.

Specifically, it is the view of IORVL that the expansion of scope suggested by the PWG not warranted for a program of this nature. In both of the last two years, IORVL has successfully conducted this type of work in a safe and environmentally responsible manner in the Northwest Territories. This work was conducted to the satisfaction of the regulators and communities in those jurisdictions without the need for any environmental assessment at all.

IORVL is very concerned about the schedule implications associated with the expansion of scope proposed by the PWG. Such scope expansions, and any subsequent extension of the duration of the environmental assessment would seriously impact our ability to conduct the proposed program this coming winter. Information from this program would be used to improve the design and execution plans for the Mackenzie Gas Project.

I trust this comment will assist the Review Board in finalizing the terms of reference for the environmental assessment. I look forward to the timely decision of the Review Board.

Sincerely,

J.R. Hawkins  
Mackenzie Gas Project  
Pipeline Regulatory Manager