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National Energy Board
444 Seventh Avenue SW
Calgary, Alberta
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Delivered electronically to info@neb-one.gc.ca

**Re: Draft Financial Viability and Financial Responsibility Guidelines
(of the Canada Oil and Gas Operations Act)**

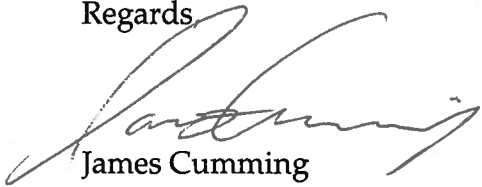
The Edmonton Chamber of Commerce would like to go on record as being opposed to the Draft Financial Viability and Financial Responsibility Guidelines as they are currently written. We represent nearly three thousand local members and an additional six thousand member businesses via World Trade Centre Edmonton affiliations with Chambers of Commerce throughout Canada's north. We are concerned that the proposed guidelines could be a significant barrier to resource investments and developments in the north, have a negative impact on many of our members and result in a serious stagnation of the territorial economies.

As examples of our concerns, the Chamber believes the proposed guidelines – if implemented as presented – will further discourage on-shore exploration activities in the NWT and Nunavut many of which are undertaken by our member companies who are small to medium sized exploration and development companies that may not have the capacity to meet what appear to be overly aggressive financial requirements and safeguards. Specifically, the guidelines do not appear to be scalable to the scope and nature of the activity (off-shore versus on-shore and magnitude of operation/potential impact for on-shore activities). This combined with the requirement for unfettered access to funds “equal to or greater than the estimated cost of stopping and containing a “Worst Case Scenario” (which in itself requires further clarification) as well as the proposed requirements for excessive insurance provisions, could very well eliminate the ability of the critical smaller operators/explorers to work in the regulated areas. For all operators, a maximum limit should be established on the amount of “Financial Responsibility” required by the Board and a determination of the amount of the letter of credit be understood at the onset (rather than being at the NEB's discretion when an application is made).

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In light of the fact that many other chambers, organizations and businesses have expressed similar concerns, we strongly suggest that the National Energy Board enter into a further round of in-depth consultations and negotiations with all stakeholders that will be impacted by changes to the Financial Viability and Financial Responsibility Guidelines. Please contact me directly to arrange further discussions with the Edmonton Chamber of Commerce and our member companies.

Regards



James Cumming
President & CEO

cc: Baffin Region Chamber of Commerce
Canadian Chamber of Commerce
Fort Simpson Chamber of Commerce
Hay River Chamber of Commerce
Inuvik Chamber of Commerce
Norman Wells Chamber of Commerce
Northwest Territories Chamber of Commerce
Yellowknife Chamber of Commerce