

**EnCana Corporation comment and proposed changes in response to public comment for
 QUANTIFICATION PROTOCOL FOR PUMP SYSTEM CONVERSION TO REDUCE GREENHOUSE GAS EMISSIONS
 for the public posting period October 29-30 2nd, 2009 closing November 13th, 2009**

#	Section	Type of Comment	Comment / Statement	Proposed Resolution and Modifications made to Protocol
1	-	General	What is the size requirements on pumps? Definition of pump?	Not Applicable- Definition is included in the protocol (see p. 5 for definition on pump), which has a broad enough scope to address a wide variety of pumps and projects.
2	Flexibility Mechanism / Contingency	Editorial	In the Flexibility Mechanisms... what is to stop someone from using the specs at all time? Is it necessary to discount these? Have a criteria that states that it is a flexibility and shouldn't be applied all the time. I.e. remoteness of some projects may require use of man. specs. **Under consideration. Good to add more language and criteria (calibration records etc.). If these are remote, do you have regular calibration, monitoring of these pumps. Can this be verified? Will add more criteria. Could be in contingency calculation, not used 100% of time. Caution on discounting too much for	Applicable- EnCana Corporation had proposed to include a new flexibility mechanism to account for projects without metered quantities. Given the feedback at this meeting, EnCana Corporation has decided to place this proposal in the contingency table and not in the flexibility section. The following criteria will be added (p. 33, 35- Method for B 3 and B 4): "Estimated based on technical specifications for liquid injection rate." A footnote has been added as well : "For verification, the project proponent must show that the pump was operating by identifying the run time of principal operating equipment or other practical indicators within the facility." This approach will be subordinate to the main approach of metering and therefore will only be used when metered data is not available. This approach will also unlock potential smaller projects that are uneconomic or administratively onerous to meter. We felt that this adds value to the protocol because: <ul style="list-style-type: none"> It is a practical and cost-effective approach to incent widespread conversion of small-scale emissions reductions,

			<p>small scale applications.</p> <p>Suggestion to make the engineering data the rule and make the specific observation data as the exception. Expect that in most cases you will use engine specs and you would likely find that they are very close.</p> <p>Is there precedent? Energy efficiency protocol. Might be worth having a quick huddle on it.</p> <p>If it is a remote area, how do you ensure that the protocol is working according to specs?</p> <p>Metered data is always preferred.</p> <p>Consider - Is there a size threshold that will trigger</p>	<p>and</p> <ul style="list-style-type: none"> • Chemical injection rates are constant and can be calculated by vendor's engineering specifications.
3	Table 2.6	General	Is a brand new pump required or is 'modification' allowable.	Not applicable- Yes. Update, install or retrofit a pump is the requirement. Modification would likely fall under update. See page 1 (section 1) of the protocol for details.