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Oslo,
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Consultation memo – 20th Licensing Round.

With reference to the letter from the Ministry of Petroleum and Energy dated 20th April, Wintershall Norge AS would like to comment on the proposed blocks to be announced in the 20th Licensing Round.

Firstly we would like to state our full support for the memo from the OLF Administration and secondly emphasise a few of the issues concerning Wintershall in particular.

The extensive nomination of 301 blocks or part blocks by 46 companies shows the level of interest and commitment in the 20th Round. A significant part of the success has been a result of the efforts of the MPE and NPD to promote the attractiveness of the NCS. We were disappointed therefore, at the proposal of the MPE to limit the round to 104 blocks of which only 30 blocks are in the Barents Sea.

This disappointment applies particularly to the Barents Sea where, after years of limited interest, a renaissance has been brought about by the combination of new discoveries, the first developments coming on-stream and the high oil price. Certainly, the large amount of untested acreage with potentially significant undiscovered resources in the Barents Sea has been a draw card for Wintershall with its developing expertise in the Russian Barents Sea. Regrettably, of the 10 blocks nominated by Wintershall in the Barents Sea only 3 have survived the process so far.

Wintershall acknowledges the complex environmental and fishing industry issues in parts of the areas that were opened for 20th Round nominations. We are however confident that it is possible to find solutions for both the fishing- and oil industry to operate in the same areas without jeopardizing the environment and are prepared to cooperate in this dialogue.

Predictability is important for the oil and gas industry. The ULB report, which was issued at the time of 19th Round awards, limited the oil industry's access to environmentally sensitive areas. It is therefore unfortunate that the access to acreage is further reduced by taking so many of the nominated blocks out of the list for the public hearing.

Given the number of companies, the interest shown and the small number of licences available at this stage, our expectations for success in the 20th Round would realistically have to be limited, especially if the number of blocks available was decreased even further. As with most companies, Wintershall has limited technical resources and we would have to weigh our chance of success in the 20th Round with opportunities elsewhere in the world. It would be

2/2 – May 22, 2008

most unfortunate if the gains the MPE have made to draw newcomers into the NCS were to be lost due to insufficient prospective acreage on offer.

We are confident though of the Norwegian people's understanding of the importance of the oil and gas industry to the economy, the MPE's appreciation of the importance of providing sufficient prospective acreage and its ability to maximise the benefits on the NCS for all the stakeholders. And so we look forward with confidence to a successful 20th Round.

Regards,

Sheila Doherty
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