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Hearing on the process for awards in predefined areas

DONG E&P Norge AS refers to letter dated 17 November from Ministry of Petroleum and Energy, which offers us the opportunity to comment on the APA licensing system as it had been administered since it was introduced in 2003. First of all DONG would like to complement the Ministry of Petroleum and Energy for the efficient and professional way the APA system has been managed. This has provided a solid basis for the petroleum industry to perform and deliver its part in the form of exploring, developing and exploiting the acreage that have been awarded.

20 January 2009

Your ref. 08/03391-1
Our ref. EP-052621

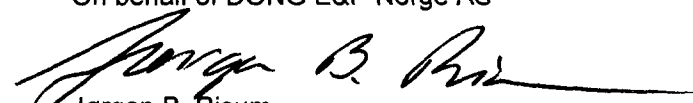
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DONG fully support the letter delivered by the OLF on behalf of the industry and see no reason to repeat any of the statements made in here. On DONG's part we have been very appreciative of the predictability of the annual APA-rounds both in terms of the acreage that were offered and the timing of the rounds.

With the very high interest from the industry in the APA rounds, as we have seen during recent years, obviously acreage is becoming scarce. The tight administration of deadlines and work progress from the Authorities side, however, has ensured that the acreage is explored and delivered back for re-application in a timely fashion. As a consequence we are still seeing the oil industry bringing new exploration ideas into play. With respect to environmental issues, it is our impression that the Authorities have continuously adjusted their environmental requirements, both in general terms and in specific areas, and thereby have been able to accommodate needs from both the fishing industry and environmental protection agencies.

In conclusion DONG sees the APA system as a very useful and efficient way of administering the more mature parts of the Norwegian Continental Shelf, and with adequate means on the part of the Authorities to direct and control this activity.

Yours sincerely,
On behalf of DONG E&P Norge AS



Jørgen B. Risum
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