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September 20, 2012

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
New Brunswick Securities Commission
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Superintendent of Securities, Newfoundland and Labrador
Superintendent of Securities, Northwest Territories
Superintendent of Securities, Yukon
Superintendent of Securities, Nunavut

Mr. John Stevenson, Secretary Ontario Securities Commission 20 Queen Street West Suite 1900, Box 55 Toronto, Ontario M5H 3S8

e-mail: <u>istevenson@osc.gov.on.ca</u>

Me Anne-Marie Beaudoin, Corporate Secretary Autorité des marchés financiers 800, Square Victoria, 22e étage C.P. 246, Tour de la Bourse Montréal, Québec H4Z 1G3

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Dear Mr. Stevenson and Me Beaudoin

Re: CSA Consultation Paper 25-401: Potential Regulation of Proxy Advisory Firms

Essential Energy Services Ltd., a TSX-listed company, supports the recommendations noted below as included in the letter from the Canadian Investor Relations Institute dated September 12, 2012 responding to the above referenced CSA Consultation Paper 25-401.

The CIRI recommendations include:

a) Proxy Advisory (PA) Firms should be required to disclose methodologies, sources of information, assumptions used to prepare their research reports and rationale for their voting recommendations.

b) PA Firms should prominently identify in the research reports and voting recommendations provided to their institutional investor clients any specific potential conflicts of interest with regard to the

issuer and analyst/reviewer ownership interests.

c) PA Firms should be required to provide to all issuers draft research reports and voting recommendations for review for factual accuracy allowing 48 to 72 business hours for issuers to

respond prior to the report being distributed to the PA Firm's clients.

d) PA Firms should be required to include in the final report to investors any comments provided by

issuers regarding the review process, the research report and the voting recommendations.

e) PA Firms should establish an appeals process and identify an independent third party or Ombudsman to adjudicate on behalf of those issuers who have concerns about a research report

that cannot be resolved through direct dialogue with the PA Firm.

f) Institutional investors who use a PA Firm should comply or explain why they do not comply, with a

requirement to disclose how they assess the advice received from the PA Firm and not automatically

follow it.

As a publicly listed issuer in Canada we support and encourage good corporate governance practices

and believe that regulation of Proxy Advisory Firms via the above stated recommendations will serve to improve the transparency and efficiency of the Canadian capital markets.

Sincerely,

"Karen Perasalo"

Essential Energy Services Ltd.

Karen Perasalo

Corporate Secretary and Director, Investor Relations

cc: Mr. Garnet Amundson, President and Chief Executive Officer, Essential Energy Services Ltd.

Mr. Michael Black, Director and Chair of the Compensation & Governance Committee, Essential

Energy Services Ltd.