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British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission – Securities Division
Manitoba Securities Commission
Ontario Securities Commission
Office of the Administrator, New Brunswick
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Securities Commission of Newfoundland and Labrador
Registrar of Securities, Northwest Territories
Registrar of Securities, Yukon Territory
Registrar of Securities, Nunavut

SENT TO:
Rosann Youck,
Chair of the Continuous Disclosure Harmonization Committee
British Columbia Securities Commission
P.O. Box 10142, Pacific Centre
701 West Georgia Street
Vancouver, British Columbia
V7Y 1L2
Fax: (603) 899-6814
e-mail: ryouck@bcsc.bc.ca

Denise Brosseau, Secretary

Commission des valeurs mobilières du Québec
Stock Exchange Tower
800 Victoria Square
P.O. Box 246, 22nd Floor
Montréal, Québec
H4Z 1G3
Fax: (514) 864-6381
e-mail: consultation-en-cours@cvmq.com

Dear Sirs/Mesdames:

Re: PROPOSED NATIONAL INSTRUMENT 51-102 CONTINUOUS DISCLOSURE OBLIGATIONS

We are pleased to provide comments on the changes to proposed National Instrument 51-102 Continuous Disclosure Obligations.

EnCana is one of the world's leading independent oil and natural gas production companies with an enterprise value of approximately C$30 billion. EnCana explores for, produces and markets natural gas, crude oil and natural gas liquids in Canada, the United States, the U.K. North Sea and Ecuador. EnCana is listed on the TSX and on the NYSE.

As a company that believes in fully transparent disclosure and good corporate governance practices, we commend the Canadian Securities Administrators (CSA) on their progress towards improving continuous disclosure obligations in Canada. In general we agree with the proposed continuous disclosure requirements and believe that they will improve disclosure to shareholders. In addition, we note that the proposed requirements will harmonize continuous disclosure requirements in Canada with those of the US.

However, we would ask that you consider the following with respect to Section 4.5 of proposed National Instrument 51-102 which requires interim financial statements to be reviewed by the audit committee and approved by the board of directors of an issuer prior to filing with securities regulators. The explanatory note to that proposed change indicates that it is intended to clarify the distinction between review and approval by replacing the concept of board review with board approval.

We understand that one effect of this change (as a result, in the case of Ontario, of the proposed revocation of Section 2.2(7) of Ontario Securities Commission Rule 52-501) would be to prevent a board of directors of an issuer from delegating authority to approve interim financial statements to its audit committee. While we have no objection to requiring board approval, rather than review, of interim financial statements, we believe that an issuer should be able to delegate that approval to its audit committee. As a practical matter, this requirement would require us to convene additional board meetings solely for the purpose of approving our interim financial statements. That seems unnecessary given the independence of our audit committee and its oversight of the preparation of our interim statements. As well, this requirement goes beyond the requirements of the Sarbanes-Oxley Act in the United States and would require a different approval process for interim financial statements as a solely Canadian requirement.

In the circumstances, we submit that audit committee approval of interim financial statements will ensure the integrity of those statements and, accordingly, that it is not contrary to the public interest to permit board approval of interim financial statements to be delegated to an issuer's audit committee.

We appreciate the opportunity to express our views on these proposed rules.

Yours truly,

ENCANA CORPORATION

Ronald H. Westcott
Comptroller
Senior Vice-President, Corporate Finance