

January 15, 2009

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
Nova Scotia Securities Commission
New Brunswick Securities Commission
Office of the Attorney General, Prince Edward Island
Securities Commission of Newfoundland and Labrador
Registrar of Securities, Government of Yukon
Registrar of Securities, Department of Justice, Government of the Northwest Territories
Registrar of Securities, Legal Registries Division, Department of Justice, Government of Nunavut

British Columbia Securities Commission
P.O. Box 10142, Pacific Centre
701 West Georgia Street
Vancouver, British Columbia, V7Y 1L2
Attention: Noreen Bent, Manager and Senior Legal Counsel, Corporate Finance

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

Dear Ladies and Gentlemen:

Please find attached Ensign Energy Services Inc.'s response to the proposed National Instrument 55-104 "Insider Reporting Requirements and Exemptions" (the Proposed Instrument) and Companion Policy 55-104CP "Insider Reporting Requirements and Exemptions" (the Proposed Policy). Our comments are provided for your consideration.

About Ensign Energy Services Inc.

Ensign Energy Services Inc. ("Ensign") is an international oilfield services contractor, headquartered in Calgary, Alberta. Ensign is a non-venture issuer with a December 31 fiscal year-end and our common shares are publicly traded through the facilities of the Toronto Stock Exchange (symbol: ESI).

1. Specific Requests for Comment - Definition of “reporting insider”

a) *Do you agree that the reporting requirement should be limited to insiders who satisfy the criteria of routine access to material undisclosed information and significant influence over the reporting issuer? If not, why not? What other criteria should we use in determining who should have to file insider reports?*

We agree with the intent of introducing the concept of a “reporting insider”.

b) *Do you think the persons or companies enumerated in the definition of “reporting insider” are appropriate? If you think any persons or companies should be added or removed, please explain.*

We generally agree the persons or companies enumerated in Part 3.2(1) are appropriate with one noted exception. As the intent of the Proposed Instrument is to narrow the focus of the number of insiders required to file insider reports to a core group with the greatest access to undisclosed material information and the greatest influence of the reporting issuer, we believe that with the addition of Part 3.2(1)(i) to the Proposed Instrument that Part 3.2(1)(c) should be removed. The inclusion criteria set out in Part 3.2(1)(i) is more relevant and applicable to the intent of the proposed changes than that of Part 3.2(1)(c). The continued inclusion of Part 3.2(1)(c) would perpetuate the inclusion of, on the basis of definition alone, certain persons with knowledge or influence over a portion of the operations or financial results of the reporting issuer but not the reporting issuer as a whole.

c) *We think that the proposal to limit the reporting requirement to reporting insiders (as currently defined) will significantly reduce the number of insiders who have to file insider reports, particularly for larger issuers with many subsidiaries and affiliates. Do you agree? If possible, please describe the anticipated impact of this change on your organization.*

As currently proposed, there would be no change to the number of Ensign's reporting insiders.

2. Specific Requests for Comment - Definition of “major subsidiary”

a) *We are proposing to amend the percentage thresholds in the definition of “major subsidiary” (currently found in NI 55-101) from 20% of consolidated assets or revenues to 30% in the Proposed Instrument. Do you agree with this change? If not, what should the thresholds be?*

We support the proposed amendment to the percentage thresholds.

3. Specific Requests for Comment – Reporting Deadline

a) *We propose to retain the current ten day timeline for filing initial reports to accommodate new filers however we propose to accelerate the reporting deadline from ten to five calendar days for subsequent insider reports. Do you agree with this proposal? If not, please explain. Do you think that we should also accelerate the reporting deadline for filing initial reports to five calendar days? If not, please explain.*

We agree with the proposal to not change the reporting deadline for filing initial reports however, we object to the proposal to accelerate the reporting deadline from ten days to five calendar days.

Our primary objection pertains specifically to dividend reinvestment plans that do not meet the definition of an automatic securities purchase plan. We recommend the Proposed Instrument provide reporting insiders an exception from the five-day filing requirement for “yet-to-be-specified transactions”, that is, for transactions where objective criteria prevent the insider from controlling or knowing the timing of transaction

execution or the value of the transaction until a future date. Specifically, we would recommend reporting insiders are permitted delayed reporting in the case of transactions pursuant to a single market order that is or could be executed over more than one day (but not exceeding a specified number of days) or in the case of transactions that cannot be valued until settlement and allocation of a single market order to the reporting insiders.

Our past and current experience in the execution of our dividend reinvestment plans is that the third-party administrators we utilize to transact these single market orders and the resultant participant allocations are unable to provide either the reporting issuer or the reporting insiders the information that is required to complete the reporting insider's filing within five calendar days.

We also disagree with the change to five calendar days because we do not believe that time frame would provide sufficient time, in the situation of an issuer-initiated event, for a reporting insider to receive written notification from an issuer and process their SEDI filing. The five calendar day filing deadline does not accommodate timing issues associated with the postal service, weekends or statutory holidays. The five calendar day filing deadline within the Proposed Instrument is presumptive that the issuer, and not the individual reporting insider, performs the SEDI filings of the reporting insider; the Proposed Instrument does not provide any dispensation in the event a reporting insider cannot be contacted within the specified time frame.

4. Specific Requests for Comment - Definition of "significant shareholder"

a) *Do you think a significant shareholder should be determined by the shareholder's holdings of a particular class of voting securities, or is the current basis for determining whether a person is a significant shareholder (based on holdings of all of the issuer's outstanding voting securities) appropriate? Please explain.*

We believe the current basis for determining whether a person is a significant shareholder is appropriate.

b) *Should different considerations apply to the disclosure thresholds for the purposes of the early warning requirements and the insider reporting requirements?*

No comment.

5. Specific Requests for Comment – Concept of "post-conversion beneficial ownership"

a) *Do you agree with harmonizing the insider reporting regime with the early warning regime to address securities convertible within 60 days? If not, why not? Should different considerations apply to the disclosure thresholds for the purposes of the early warning requirements and the insider reporting requirements?*

No comment.

b) *Are you aware of any practical difficulties in applying the disclosure test for the 60-day convertibles in the early warning system? If yes, please explain.*

No comment.

c) *Should we exempt any types of securities or security holders from this calculation for the purposes of determining insider status? For example, should we exempt convertible securities (such as options) that are significantly "out-of-the-money"? Should we exempt "eligible*

institutional investors” (as defined in National Instrument 62-103) from this definition for insider reporting purposes?

No comment.

6. Specific Requests for Comment – Issuer Grant Report

a) Do you agree with this proposal? Do you think issuers and insiders will find this exemption useful?

We do not object to a reporting issuer being provided the option of filing an issuer grant report. We do believe this proposal is of limited use and potentially increases administrative burden. As Part 6.2(2) of the Proposed Policy requires the reporting insider to confirm the issuer grant report was filed on time before being allowed to apply the exemption, communication is still required within five calendar days between the issuer and the reporting insider. Additional communication and monitoring would then be required by both the issuer and the reporting insider to ensure all requisite SEDI filings are subsequently performed by the reporting insider.

b) We are proposing that the issuer grant report be filed on SEDAR, pending necessary changes being made to SEDI. Do you think the information in an issuer grant report is better disclosed through SEDAR or SEDI?

We believe an issuer grant report is better disclosed through SEDI. This would consolidate the information concerning the trading activities and holdings of the reporting insiders of an issuer in a single location.

c) The issuer grant report exemption contemplates that reporting insiders who rely on this exemption will make an annual filing’ similar to the manner in which reporting insiders currently report acquisitions under an automatic securities purchase plan. Do you agree with this approach? Do you think annual reporting is sufficiently timely?

We do not object to the proposed approach.

d) We have proposed that the deadline for filing the annual report under Part 5 and Part 6 should be 90 days from the end of the calendar year. Is this appropriate? Should we accelerate this deadline for filing these annual reports to, for example, 30 days from the end of the calendar year?

We do not object to the 90-day deadline for filing an annual report under Part 5 or Part 6 of the Proposed Instrument.

7. Specific Requests for Comment – Report by certain designated insiders for certain historical transactions

a) Do you agree with the proposal to require these filings to be made on SEDAR rather than SEDI? Alternatively, do you think these filings should continue to be made on SEDI? Please explain.

We believe that the filings under Part 3.6(1) of the Proposed Instrument for a designated insider that is a person, and not a company, should be made on SEDI.

8. Specific Requests for Comment – Disclosure in shareholder meeting information circulars

a) Do you agree with the proposal to require issuers to disclose whether any of its insiders have been subject to late filing fees? Do you think the disclosure requirement should apply only to insiders who repeatedly incur late filing fees? Please explain.

We disagree with the proposal to amend Form 51-102F5 "Information Circular" of National Instrument 51-102 "Continuous Disclosure Obligations" that would require issuers to disclose whether any of its reporting insiders have been subject to late filing fees. We believe this information is not reasonably within the power of the issuer to attain.

We thank you for the opportunity to provide our comments. Please contact us to discuss any questions arising from the content of this communication or to further discuss the basis for our opinions.

Sincerely,
ENSIGN ENERGY SERVICES INC.



Glenn Dagenais, CA
Executive Vice President Finance and Chief Financial Officer