



Precision
DRILLING

October 2, 2013

Ontario Securities Commission
20 Queen Street West
22nd Floor
Toronto, Ontario
M5H 3S8
Attention: Secretary

Dear Sir or Madam:

**RE: OSC Staff Consultation Paper 58-401
Disclosure Requirements Regarding Women on Boards and in
Senior Management**

Precision Drilling Corporation ("Precision") appreciates the opportunity to provide feedback to the OSC on the proposed Disclosure Requirements regarding women on boards and in senior management. We recognize the value of diverse perspectives in addressing today's complex business challenges and welcome OSC's invitation to express a point of view on how to further the advancement of women in business in Canada.

Precision is a leading oilfield services company headquartered in Calgary, Alberta, Canada and is listed on the Toronto Stock Exchange under the trading symbol "PD". Precision is also listed on the New York Stock Exchange under the trading symbol "PDS". We have operations in Mexico and several countries in the Middle East in addition to an extensive fleet of rigs in Canada and the United States.

The quality of our services is distinguished by the quality of our people. We believe diversity, which goes beyond gender, demonstrates a commitment to think broadly and acting inclusively. We have been proactive in developing diversity, including the addition of Ms. Catherine Hughes to our Board of Directors in 2013.

Precision's Corporate Governance, Nominating & Risk Committee has considered the OSC's Discussion Paper. Precision is supportive of the views expressed in the submission of the Institute of Corporate Directors dated September 23, 2013. Precision would also encourage the "comply and explain" approach to increase transparency on this discussion, allowing the responsibility for metrics and accountability to lie with the issuer. Disclosure, and their stakeholder's interest, would cause issuers to follow through on stated priorities.

Precision Drilling Corporation

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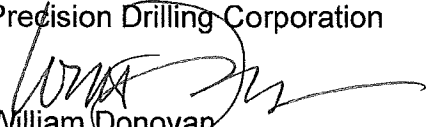
Diversity comes in many forms. Precision does not support overly prescriptive regulation or quotas. Merit of the candidate and needs of the organization must remain paramount.

Disclosure of the number of women in senior leadership and board roles would provide meaningful transparency where it is most needed. Data about women employees overall may be less helpful, encouraging debate about proportionate representation. Precision as an oilfield services company is an example of a gender imbalance when the organization is taken as a whole but more normative when considered at the administrative and senior levels.

Precision believes that the success in attaining greater female participation at the leadership and board levels begins early in a woman's career, fostered by exposure to a broad variety of business opportunities, line experience and leadership with increasing levels of responsibility and scope.

We hope that this discussion fosters a determined approach to continue to build diversity in public companies for good and valid business reasons.

Yours truly,
Precision Drilling Corporation



William Donovan
Chair, Corporate Governance, Nominating & Risk Committee