Emergency Management Program

Public Information

INTRODUCTION

An effective Emergency Management Program (EMP) is essential to our ability to prepare for and respond to emergencies. To meet this challenge the company has created documentation and procedures intended to enhance our capability.

The Emergency Management Program documentation includes several manuals and guides. Key documents could be, but is not limited to:

- Emergency Response Plan (ERP)
- Emergency Management Manual
- Pipeline Operations Manual
- Health, Safety and Environment Plan(s)

Assessments of the hazards and risks associated to our operations are regularly performed. Action plans to eliminate or mitigate the impact of potential hazards are implemented as a result of these assessments.

The National Energy Board and provincial regulators establish and enforce requirements for oil and gas operations. Key elements of these requirements are:

- Documentation as listed above
- Training and exercises which include invitation for the regulators to attend and observe
- Location specific information gathering which includes:
    - Public residence, community, business and density specifics
    - Sensitivities
    - Environmental receptors
    - Emergency contact information
- Roles and responsibilities of responders
- Emergency specific actions to reduce or eliminate risks to the public, workers or environment

In support of these programs and activities, company policy has been developed, supported and approved by upper management to warrant company commitment. These policies cover Emergency Management, Emergency Response, Workplace Health and Safety, Environmental Planning and Corporate Security.

KEY PUBLIC SAFETY INFORMATION

A risk assessment has been performed for this operating location. The assessment considers the substance(s) involved, their potential behaviour and ultimately the hazards that could occur. This analysis establishes an Emergency Planning Zone (EPZ) within which information is gathered. Contact information, including businesses, other industrial operators and communities is included in the Emergency Response Plan. In addition, based on the location, the nearest emergency services, local authority, government agencies and support services are identified and contact information is also contained in the ERP.

The scenarios considered for this assessment are:

- A rupture causing release of product into the atmosphere. Although the environmental and/or public impact of a gas release is considered low due to remoteness, there could be subsequent risk of fire or explosion. The pipeline has a very low potential for rupture from either natural or human factors.
- A spill causing release of product into the environment. Public impact is considered low due to remoteness, however the environmental risk is notable. The pipeline has a low potential for rupture from either natural or human factors.

An emergency resulting from a gas release is unlikely to have impact beyond the defined EPZ, or to affect the public or environment due to its remote location. A spill meeting, or exceeding reportable amounts will require immediate remediation. Strategic is a WCSS member in good standing and operations personnel attend yearly exercises. WCSS Cooperatives maintain spill contingency plans, and the spill equipment (OSCAR units) for Area A are located in Zama City and Rainbow Lake. Generic spill procedures are outlined in the ERP to ensure immediate response can be initiated.

In an emergency situation contact information is readily available and, following specific protocols, contacts are made to:

- Activate emergency responders
- Inform local authorities and government agencies
- Request fire, ambulance, police as needed
- Request support services to provide additional response assistance

Under certain circumstances in an emergency event, notification to the residents will occur. This contact will be informational and instructional. For sensitive residents contact is made to notify of the incident and provide ample time for voluntary evacuation. Additional contact will be made with instructions to evacuate or shelter in place if specific conditions are met.

If you have been identified as a resident within a calculated EPZ you will have received a detailed information package explaining our operations and providing a map of the area. The package includes 24 hour contact information for the company.

In an emergency the company will also provide you with specific contact information if you are displaced from your home. Public notifications are released in conjunction with the regulator. This is a provincial requirement to ensure that information released to the public comes from an authorized source, is accurate and has been approved.

Environmental planning required to construct pipeline facilities is performed to ensure there is no negative impact from our operations. In the highly unlikely event that, due to our activity, a water supply is contaminated the company commits to providing a temporary potable water supply until remedial action has been completed or a permanent alternate water source is established.

EMERGENCY PROCEDURES MANUAL

We have developed and regularly update an emergency procedures manual called an Emergency Response Plan (ERP). This document provides emergency responders with relevant information and

guidance during an emergency situation. As required by the NEB a copy of the ERP associated with our Trans-provincial border pipeline is available on this company public website. Please note that the online public copy of the ERP has been redacted to protect the developer's proprietary intellectual property.

Understandably, the ERP is a document that the company would prefer not to invoke. In support of this we develop policy and procedures to govern our operations. Documentation and records are created and maintained to ensure the least possible impact to the public and environment beginning at the planning stages of construction through to reclamation of our facilities.

GOALS AND OBJECTIVES

The primary objective of the EMP is to support company emergency response. We assess our operational areas, perform activities and tasks that will make our facilities more unlikely to fail and establish routines and schedules to improve our speed and ability to respond. Government agencies, landowners, residents and other stakeholders are invited to participate throughout the planning process. On a regular basis and as required, communication and information is made available to any interested party.

Many of these activities are requirements of provincial agencies that have jurisdiction over oil and gas activities.

HAZARD IDENTIFICATION

The following is a list of common hazards that could affect our operations. Others may be considered depending on the region or proximity.

Natural Hazards

- Erosion
- Extreme temperature
- Flooding
- Forest/wild fire
- Land subsidence
- Landslide
- Lightning
- Snowstorm/blizzard
- Windstorm/tornado

Technological Hazards/Mechanical Failure

- Building/structural collapse
- Infrastructure failure
- Energy supply emergency

Human-Caused Hazard

- Civil disorder

- Sabotage
- Terrorism
- Human error

RISK ASSESSMENT

The risks associated to the above hazards as they relate to oil and gas operations are:

- Gas Release
- Fire and/or Explosion
- Spill
- Injury / Fatality

The company uses Risk Assessment tools like the following to establish a measurement of the threat that hazards could have:

RISK = PROBABILITY X CONSEQUENCES

SEVERE RISK – requires immediate risk control actions

MAJOR RISK – requires risk control actions

SIGNIFICANT RISK – monitor closely and plan for risk control actions

MODERATE RISK – monitor and consider risk control actions

LOW RISK – no follow up activities required

Risk Assessment Table		Consequences				
		Catastrophic 5	Major 4	Moderate 3	Minor 2	Insignificant 1
Probability	Almost Certain (High) 5	Severe 25	Severe 20	High 15	Major 10	Significant 5
	Likely (Moderate - High) 4	Severe 20	High 16	Major 12	Significant 8	Moderate 4
	Possible (Moderate - Low) 3	High 15	Major 12	Significant 9	Moderate 6	Low 3
	Unlikely (Low) 2	Major 10	Significant 8	Moderate 6	Low 4	Trivial 2
	Rare 1	Significant 5	Moderate 4	Low 3	Trivial 2	Trivial 1

A major or high risk hazard rating compels the company to put in place increased operational control, response infrastructure and mitigation procedure.

In conjunction with the ERP related to our Trans-provincial border pipeline this document is required by the NEB to be published on our public website. The risk associated to this pipeline has been assessed at moderate or lower. Based on this assessment the company will monitor the pipeline and execute strategies that are the most efficient and effective for response, clean-up and remediation.

STAKEHOLDER LIAISON

In order to create, maintain and invoke an ERP significant communication and liaison is required amongst stakeholders. During the development of a plan provincial regulators prescribe the interaction that must take place between the company and residents, landowners, businesses and area industrial operators. If you are within the calculated Emergency Planning Zone (EPZ), which is determined by a risk assessment, then contact by the company is initiated in order to gather

relevant contact information. This can happen through visitations, town hall meetings, and direct telephone contact. Annually, or as required due to significant change, the company will also be in contact to verify contact information for residents within the EPZ. Typically during these types of interactions is the opportunity for interested parties to engage in the response plan development.

The requirement for response personnel, other resources and support services is determined. Government agencies, local authorities, first responders and any other organizations are identified when they are specific to the regions where we operate. Pertinent contact information is researched and included in the ERP. This contact information is also verified on a regular basis.

During an emergency we assign Messaging Resources, Information Officers and a Liaison Officer. It is the responsibility of these individuals to ensure that relevant information is available to the public and stakeholders.

CONTINUING EDUCATION

First responders, government agencies and organizations and any other stakeholders are given the opportunity to have a copy of our ERP. This provides them with up to date details of our response objectives and goals.

Company responders are regularly involved in ERP training and exercises. These activities are prescribed by the provincial regulator. In addition the company provides training related to Health and Safety. Typical training courses could include, but is not limited to:

- WHMIS
- Personal Protective Equipment training such as SCBA training
- Confined Space (as required)
- Incident Command System (all levels as required)
- H_2S Alive
- Emergency First Aid
- Hazard Assessment

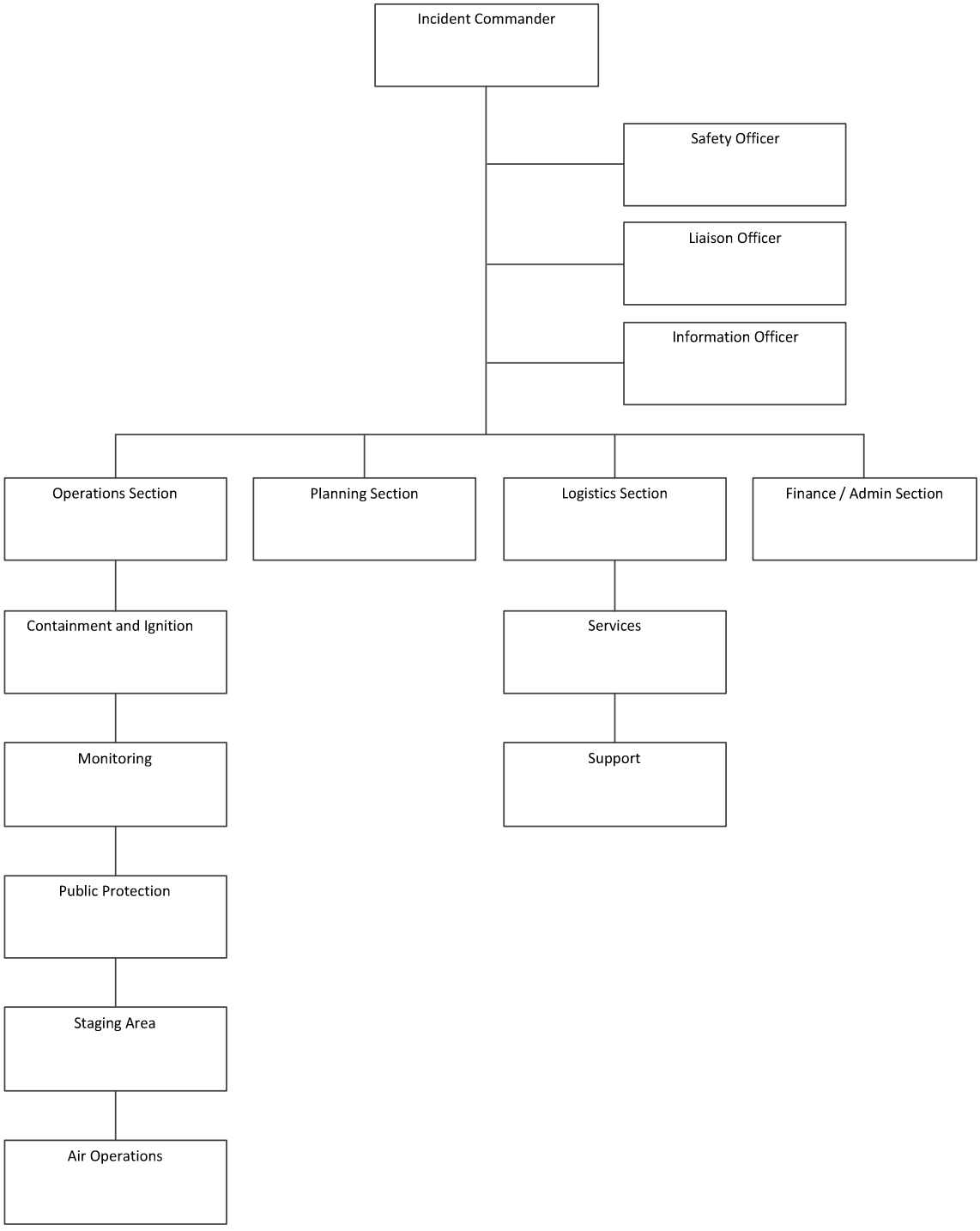
Safety meetings are an essential part of our industrial activities and during the response to an emergency.

ERP TRAINING AND EXERCISES

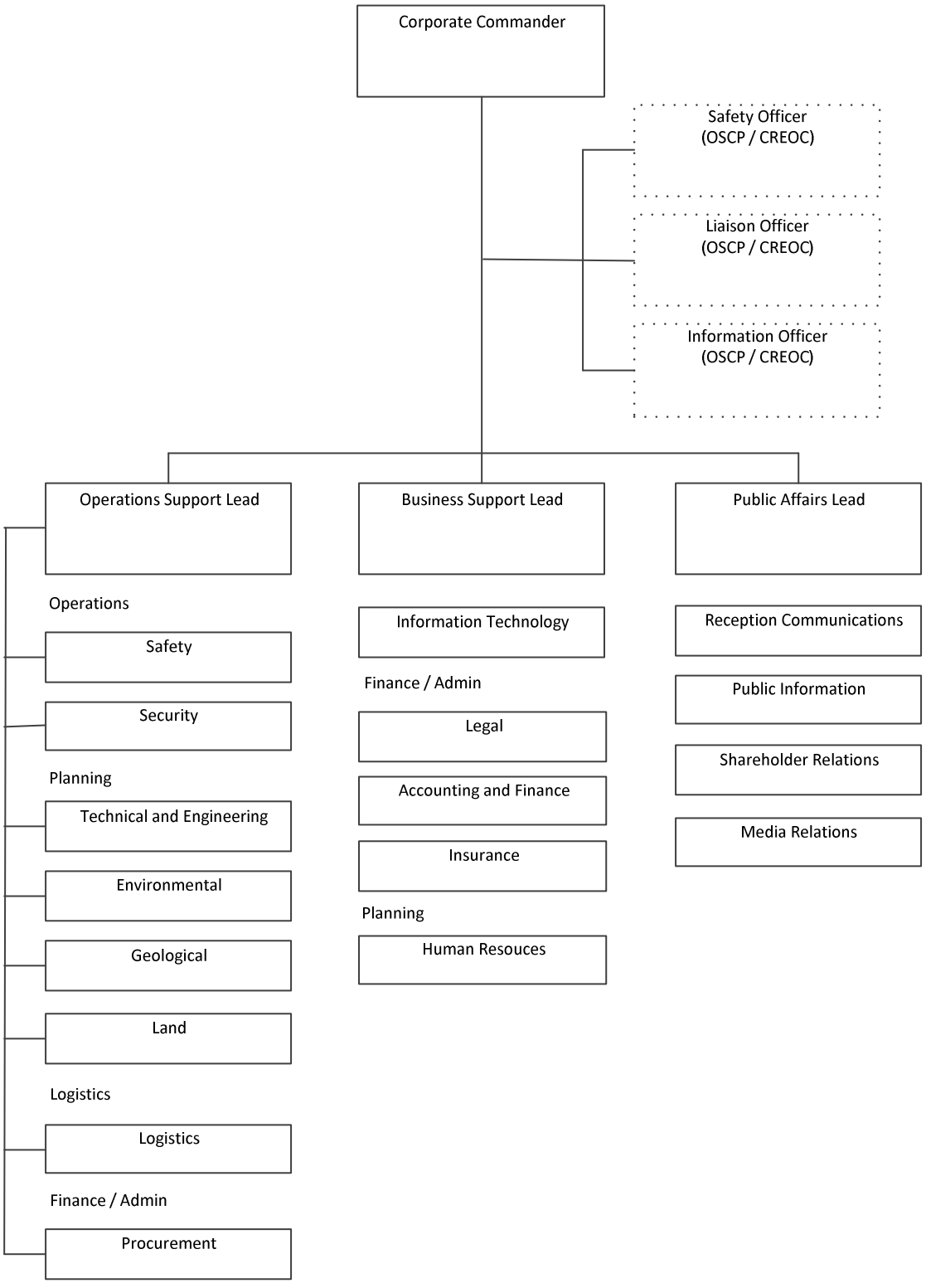
As mentioned previously the frequency of ERP training is prescribed by provincial regulators. At least annually all responders must be involved in training/exercises. This might be “tabletop” where responders work through an emergency scenario by discussing rather than performing their response activities. We could also choose to exercise specific components of the ERP, such as a communication exercise. At least once every 3 years responders must be involved in a “major exercise”. In advance of a major exercise all stakeholders are notified and given the opportunity to be involved in the emergency scenario. Provincial regulators must be invited to a major exercise and are expected to provide feedback essential to our continuous improvement effort. These exercises present the opportunity for responders to act in their roles.

INCIDENT MANAGEMENT SYSTEM

To manage an emergency incident we utilize a system based on ICS (Incident Command System). This is a standard used by First Responders. A typical emergency where ICS would be used in Canada is a forest fire. The primary difference of our ICS is that a Head Office (Corporate Command) organization is included. The following shows how our On-site Command Post response team could be organized:



This organization chart is how we would organize Head Office support in our Emergency Operations Centre:



In a large incident requiring significant external resources the ICS provides a structure to ensure effective:

- Span of Control – to ensure effective management of responder resources
- Organization Flexibility – the response organization can adapt to changing needs
- Unity and Chain of Command – clear line of supervision and authority
- Transfer of Command – needed at response intervals or when authority changes
- Unified Command – jurisdictional and functional authorities work together using a single, coordinated action plan

This information has been made available to anyone using our public website. Please do not hesitate to contact us with any comments or questions or if you require further information.