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1.0 About this Document

Scope and Purpose The scope of this program is to provide tools to implement an effective emergency management process for incidents arising from ARC Operations where ARC Resources (ARC) has controlling authority. These tools address each of the four pillars of emergency management:

- Reduction (risk mitigation, risk prevention)
- Readiness (preparedness)
- Response
- Recovery

The purpose of this program is to address incidents and risks that have the potential to affect public safety or the environment and which may involve response by others not employed or contracted by ARC.

The Emergency Management Program (EMP) is intended for use in situations having actual (or potential) off-site impact with serious to catastrophic consequences, especially when response by others is necessary or required.

The EMP ensures that ARC meets its regulatory requirements at the Federal, Provincial, and local level.

Objectives

The objective of this Program is to implement the eight governing principles that underlie development and execution of the ARC EMP as follows. The EMP shall be:

- Comprehensive – consider and take into account all hazards, all phases, all stakeholders and all impacts from incidents that potentially have serious or crucial off-site consequences
- Progressive – anticipate future incidents and take preventive and preparatory measures to build incident-resistant processes and an incident-resilient work force
- Risk-driven – use sound risk management principles (hazard identification, risk analysis, and development and implementation of appropriate mitigation) to assign priority and resources
- Integrated – ensure unity of effort among all levels of the work force and all stakeholders who respond to an emergency
- Collaborative – create and sustain broad and sincere relationships among individuals and organizations to encourage trust, advocate a team atmosphere, build consensus, and facilitate communication
- Coordinated – synchronize the activities of all relevant stakeholders to achieve common purposes
- Flexible – use creative and innovative approaches in solving on-site and off-site challenges
- Professional – promote a science- and knowledge-based approach within the ARC work force and among all stakeholders; based on education, training, experience, ethical practice, public stewardship and continuous improvement

Application This Program applies to the following:

- All employee and contractor work activities under the direction of ARC Operations.

Users Users of this Program include all workers (employees and contractors) across ARC. Majority of users are involved in Operations activities.

1.1 Core Supporting Documents and Processes for Meeting Requirements

AIMS Emergency Management Program document has been developed in full alignment to the ARC Integrated Management System (AIMS). Several Elements are directly referenced within this Program Document.

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Tools and Templates Tools and templates established to meet the requirements of this Program are as follows:

- Incident Management System
- Emergency Response Plan Templates
- H2S Release Rate Assessment Guidelines
- AER H2S Model
- Emergency Management Declaration Form

2.0 Terms, Abbreviations and Definitions

Terms and Definitions Terms and definitions relevant to this Program are defined below.

Term	Definition
AER H ₂ S Model	A software program that calculates site-specific EPZs using thermodynamics, fluid dynamics, atmospheric dispersion modelling and toxicology.
Consultation	Refers to communicating with stakeholders impacted by ARC’s EPZs.
Critical Well (Alberta Specific)	A well with an H ₂ S release rate greater than 2.0 m ³ /s or wells with lower H ₂ S release rates in near an urban centre as defined in Directive 056: Energy Development Applications and Schedules.
Ground Truthing	Act of physical driving or operators verifying what is on the EPZ maps.
Hydrogen Sulphide (H ₂ S)	A naturally occurring gas found in a variety of geological formations and also formed by the natural decomposition of organic matter in the absence of oxygen. H ₂ S is colourless, has a molecular weight that is heavier than air, and is extremely toxic. In small concentrations, it has a rotten egg smell and causes eye and throat irritations. Depending on the gaseous mixture, gas properties, and ambient conditions, a sour gas release may be: <ul style="list-style-type: none"> Heavier than air (dense), so it will tend to drop towards the ground with time,

	<ul style="list-style-type: none"> • Lighter than air (buoyant), so it will tend to rise with time, or • About the same weight as air (neutrally buoyant), so it will tend to neither rise nor drop but with time disperse.
Hydrogen Sulphide (H ₂ S) Release Rate	The rate that sour gas escapes into the atmosphere is often calculated for sour gas wells. It is usually defined in cubic metres per second (m ³ /s). The size of the emergency planning zone is estimated from the H ₂ S release rate.
Incident	Any unplanned or unexpected event that has a high potential to cause, or has caused harm to people or the environment, damage or failure of equipment, lost production, Non-Productive time and cost, damage to property, regulatory or legal non-conformances, security breaches or public complaints. Incidents include accidents, near misses and non-compliances and non-conformances when they occur.
Major (Full-Scale) Exercise	As described in CAN/CSA Z246.2-18, a multi-agency, multi-jurisdictional activity involving actual deployment of resources in a coordinated response, as if a real emergency had occurred. The full-scale exercise includes the mobilization of units, personnel, and equipment. Participants will assess plans and procedures and evaluate coordinated responses under crisis conditions.
Professional Declaration	Signed off by a licensed professional.
Surface Development	Dwellings that are occupied full-time or part-time, publicly used development, public facilities, including campgrounds and places of business, and any other surface development where the public may gather on a regular basis. Surface development includes residences immediately adjacent to the EPZ and those from which dwellers are required to egress through the EPZ.

*Additional definitions may be found in the AIMS Dictionary and the Core ERP.

Abbreviations

Abbreviations used in this document are as follows:

Abbreviation	Definition
ABSA	Alberta Boilers Safety Association
AEMA	Alberta Emergency Management Agency
AER	Alberta Energy Regulator
AHS	Alberta Health Services
AH	Alberta Health
AT	Alberta Transportation
BCER	BC Energy Regulator
BLEVE	Boiling Liquid Expanding Vapour Explosion
CANUTEC	Canadian Transport Emergency Centre
CAPP	Canadian Association of Petroleum Producers
CEOC	Corporate Emergency Operations Centre
CEPA	Canadian Environmental Protection Act
CER	Canada Energy Regulator
CISD	Critical Incident Stress Debriefing
CMT	Crisis Management Team
CPE	Communications and Public Engagement
CSA	Canadian Standards Association
DFO	Department of Fisheries and Oceans
ECCC	Environment and Climate Change Canada
EMCR	Emergency Management and Climate Readiness
EMO	Emergency Management Organization
EOC	Emergency Operations Centre
EPZ	Emergency Planning Zone
ERAC	Emergency Response Assistance Canada
ERP	Emergency Response Plan
ESD	Emergency Shut Down

ESDV	Emergency Shut-Down Valve
ETA	Estimated Time of Arrival
FH Order	Fire Hazard Order
FNHB	First Nations and Inuit Health Branch – Health Canada
FRT	Field Response Team
GEOC	Government Emergency Operations Centre
HVAC	Heating, Ventilation and Air Conditioning
HVP	High Vapour Pressure
HVPL	High Vapour Pressure Liquid
H ₂ S	Hydrogen Sulphide
IAP	Incident Action Plan
ICS	Incident Command System
IIZ	Initial Isolation Zone
INAC	Indigenous and Northern Affairs Canada
LA	Local Authority
LBV	Line Block Valve
LEL	Lower Explosive Limit
LPG	Liquefied Petroleum Gas
MD	Municipal District
MEP	Municipal Emergency Plan
MOP	Maximum Operating Pressure
NGL	Natural Gas Liquids
NOTAM	Notice to Airmen
OHS	Occupational Health and Safety
OSCAR	Oil Spill Containment and Recovery
OSCP	On-Site Command Post
PAD	Protective Action Distance
PAZ	Protective Action Zone

PECC	Provincial Emergency Coordination Centre
PPB	Parts Per Billion
PPE	Personal Protective Equipment
PPM	Parts Per Million
RCMP	Royal Canadian Mounted Police
RD	Rural District
REOC	Regional Emergency Operations Centre
RHA	Regional Health Authority
RM	Rural or Regional Municipality
SABA	Supplied Air Breathing Apparatus
SCBA	Self-Contained Breathing Apparatus
SDS	Safety Data Sheet
SO ₂	Sulphur Dioxide
STARS	Shock Trauma Air Rescue Society
TDG	Transportation of Dangerous Goods
WCSS	Western Canadian Spill Services
WHMIS	Workplace Hazardous Materials Information System

3.0 Roles and Responsibilities

Roles and Responsibilities

Roles and responsibilities associated with this Program are as follows:

Role/Position	Responsibility
Management	<p>ARC Management is responsible for the following:</p> <ul style="list-style-type: none"> • ARC’s Chief Executive Officer (CEO) will appoint an Accountable Officer who has the appropriate authority to commit financial and human resources to ensure ARC meets its obligations for safety, security and protection of the environment. The Accountable Officer will sign a statement accepting the responsibilities of this position as well as an Emergency Management Declaration Form every 12 months as per the AER’s Directive 71. <ul style="list-style-type: none"> ○ Note: For CER-regulated facilities, ARC will notify the CER of any changes made to the Accountable Officer within 30 days of the change.

- Ensure drills and exercises are conducted as required to make sure all personnel are ready to implement their ERP and respond effectively to potential emergency situations
- Ensure ARC Resources responders complete Emergency Response Plan (ERP) training
- Ensure the Incident Command Post (ICP), Calgary Emergency Operations Center (EOC) and Reception Centers have 24-hour functionality
- Verify ARC operators have full-time access to the most current ERP for their area and they are familiar with:
 - Emergency Planning Zones (if applicable) and how to access resident information, Corporate and Site-specific ERPs & individual roles and responsibilities
 - Demographics; such as landowners, land occupants and/or land lessee, general locations of residences, land use and initial notification requirements
 - Ensure all key regional and local government agencies and mutual aid plan members, potentially engaged in the field response, are aware of ARC operational activities, roles and response expectations
- Ensure hazards, risks, potential emergency situations and warning systems are communicated with all on-site personnel. Ensure there are instructions regarding actions they must take if there is an emergency
- Ensure all emergency communication systems are fully operational.
- Perform annual emergency response plan reviews and assist with update process
 - **Note:** The Production Engineer shall review technical data inputs and monitor related modelling processes to define each Emergency Planning Zone (EPZ).

Program Coordinator

The Program Coordinator is responsible for the following:

- Ensures all Sour Production ERPs are up-to-date and in place
- Ensures up-to-date regulatory references and requirements in each ERP
- Monitors emergency response KPIs outlined in the annual review meeting and in Measures of Effectiveness
- Provides an analysis of ARC performance against these KPIs for each operational period at the annual review meeting. Further information can be found in the AIMS Monitoring, Reporting and Follow-up Element.
- Sets training standards to ensure responder competencies fully meet ARC requirements
- Ensure schedules are in place to prepare, maintain and update ERPs and ERPs are monitored for accuracy

	<ul style="list-style-type: none"> • Completes the ERP Accountability Form and monitors the related timelines • Responsible for keeping the AER’s Emergency Management Program Self-Assessment Reporting Form current to measure EMP performance and promote continual EMP improvement. • Ensures ERPs are updated annually or following a material change in risks, responders, regulatory requirements or corporate standards (i.e. verify telephone numbers, key emergency contact information, public data, etc.)
<p>Health & Safety</p>	<p>The ARC Health and Safety Team is responsible for the following:</p> <ul style="list-style-type: none"> • ARC Health and Safety Team shall assist in facilitating emergency response drills, exercises and training and maintaining current emergency response plans
<p>All Employees</p>	<p>All Employees are responsible for the following:</p> <ul style="list-style-type: none"> • Ensure familiarity with ARC’s emergency response plans and how to access specific information (i.e. landowners, residence locations, services, forms, etc.) • Designated employees shall ensure emergency response equipment (i.e. fire response equipment, respiratory protective equipment, roadblock kits, etc.) and warning systems (i.e. Gas / Fire detection) are routinely checked and maintained in an effective operational condition • Participate in ERP training/exercises (ICS-100, role based, tabletop, etc.) and ensure they fully understand their roles in the event of an emergency
<p>Third-Party Resources (Contractors)</p>	<p>Third Party Resources (Contractors) are responsible for the following:</p> <ul style="list-style-type: none"> • Complete their own Site-specific emergency response plans in coordination with ARC plans • Conduct and document drills (e.g. man down) as required by legislation or as directed by the ARC supervisors, as well as, participate in ARC scheduled exercises as required • Follow direction from ARC resources personnel when responding to an emergency
<p>Executive Leaders</p>	<p>Executive leaders are responsible for the following:</p> <ul style="list-style-type: none"> • The Emergency Management Program accountability is driven from ARC Executive Management. The President appoints an Accountable Officer, who is then responsible to ensure the EMP is implemented, reviewed and that incidents and near misses are addressed with corrective actions. • The Program Coordinator is accountable to establish Corporate Emergency Response Planning Standards and to track legal requirements • The Program Coordinator is accountable to execute Emergency Plan Audit Protocols and to report on completed training and exercises. Lessons learned and

opportunities for improvement are captured in Exercise Reports. These will be kept for a minimum 5 years and may suggest necessary updates to Emergency Response Plans.

- In jurisdictions where clear regulatory guidelines for emergency planning are not available, the guidelines in Directive 071 for Alberta will apply. In general, a Sour Production Emergency Response Plan will be prepared whenever:
 - A surface development exists within an Emergency Planning Zone (EPZ) including those residing on dead-end roads beyond the EPZ where occupants are required to egress through the EPZ. Surface developments include the following:
 - Permanent and part-time residents
 - Occupied businesses, industrial activities including oil and gas operators with manned facilities.
 - Private and public recreational property owners, operators and occupants.
 - Rural public facilities and publicly used developments such as schools, community centers, registered campgrounds, and picnic areas.
- The Management Engagement Accountability Form will be maintained by the Accountable Officer (Chief Operating Officer) with assistance from the Program Coordinator and the Manager, OMS, Safety Programs and Regulatory.
- The figure on the next page outlines the flow of accountability for the various components of the ARC Emergency Management Program. The accountable person for each of the steps in the graphic is shown in “red”.

ARC EMERGENCY MANGEMENT PROGRAM

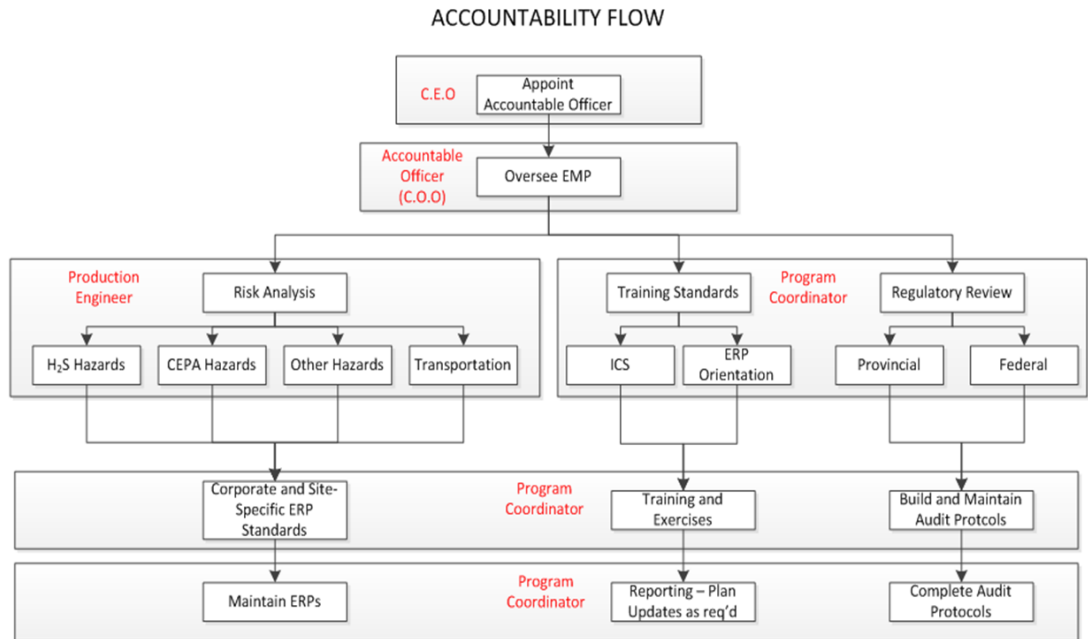


Figure 1 – ARC Emergency Management Program Accountability Flow

4.0 Emergency Preparedness Training and Exercises

4.1 Training and Exercises

ERP Training and Validation

ARC conducts ERP training and validation of emergency preparedness through periodic drills and simulation exercises. ARC has a training plan that outlines training needs, scope, methods, materials, schedules, records and evaluation.

Training and exercise sessions shall be conducted in accordance with industry standards and regulatory requirements to ensure that responsible personnel remain competent in emergency response procedures to:

- Promote emergency preparedness
- Test or evaluate emergency operations, policies, plans, procedures, facilities or communications
- Test the effectiveness of public safety procedures
- Train personnel in emergency duties

Exercises

Tabletop or functional exercises will be conducted in each area annually (except in a year when a major exercise is held) and major exercises are conducted in each area every 3 years. In situations where ARC has multiple area ERPs with the same field supervisory response personnel and infrastructure, the ERPs may be tested simultaneously through one exercise. All exercises will be documented with key learnings and corrective actions identified and communicated.

ARC Capital operations (Drilling, Completions, Pipelines/Facilities, etc.) will complete drills in accordance with regulatory requirements and industry best practices.

Exercises will test the following:

- A range of potential emergency scenarios, incorporating variations to address different emergency scenarios identified that pose a risk to ARCs operations.
 - Public safety and environmental protection procedures identified in the ERP
 - Mutual aid agreements or cooperatives, where applicable
-

Training Requirements

ARC requires its employees to complete ICS-100 and an internal Emergency Management online training when onboarding leaders, operations personnel, OSS and to corporate roles who could play a role in emergency response. ICS 200 and 300 are also required for various leadership roles.

ARC’s AIMS Training and Competency Element Assurance Element mandates responder training qualifications and competencies as well as evaluation tools to ensure effective incident response. ARC personnel who have or may have a role in emergency response participate in a minimum of one exercise annually and one Major Exercise every 3 years.

ERP training will include the following:

- All components of the plan, and the supporting tools and technology
 - Roles and responsibilities during an incident
 - Measures to protect the public and the environment during an incident
 - Planned communication protocol
-

4.2 Potential Invitees to a Response Exercise

Internal Responders

Below is a list of potential responders that should be included in the invitation:

- Area field leadership and operating staff
- Field HS Advisor
- Technical Operations Manager and direct reports (optional for tabletop exercises)
- HS Manager and direct reports (Optional for tabletop exercises)
- ERP team
- Consultant/OSS (if necessary)

Major exercises will also include:

- Production Manager and direct reports
 - Corporate On-call team
 - Calgary Reception
 - Investor Relations
-

External Responders

British Columbia

- BCER (30 days minimum notice)
- Emergency Management BC
- Regional District
- Regional Health Authority
- RCMP
- Fire Department
- WorkSafeBC
- CER (CER pipelines are regulated - 30 days minimum notice)

Alberta

- AER (30 days minimum notice – including exercise scenario details)
- Local Authority (30 days minimum notice)
- Alberta Health Services
- RCMP
- Fire Department
- CER (CER pipelines are regulated - 30 days minimum notice)
- Alberta Emergency Management Agency

4.3 Documentation of Key Learnings

Key Learnings

Third-party training providers will document all exercise details including key learnings and provide access to ARC. Real time activations of the ARC’s ERP are captured by the Program Coordinator and learnings are shared with all parties involved.

Deficiencies identified during exercises or real-life activations are captured on a web-based program (Intelex) that enable responsibility and timeline for completion to be assigned and tracked to closure.

4.4 Emergency Exercise Invitations

Invitations

ARC Resources emergency response exercises are an opportunity for external agencies to gain valuable continuing education with respect to ARC’s ERPs and areas in which ARC operates. External agencies should be invited with the intent that they may also participate in the exercise.

ARC emergency response drills (Base Operations tabletop and major field exercises) require “invitations to participate” sent to all potential responders (internal and external) 30 days prior to the scheduled exercise. (For major ERP exercises, it is preferred to give more than 30 days’ notice i.e. two or three months in advance).

The following information will be provided to the exercise participants and observers:

- Name
- Date
- Location
- Agenda
- Scenario (only to the AER, BCER, or CER)

All invitees are required to confirm participation with the Program Coordinator.

All emergency response drill participants are invited to provide feedback during and after drills to ensure continuous improvement of ARC’s EMP.

ARC’s process for all internal and external communication of information that includes procedures for communication with the public, corporately, contractors, regulatory agencies and emergency response agencies can be found in AIMS License to Operate Element.

4.5 Spill Response Equipment Training

Spill Cooperatives

ARC Resources is a member of the Western Canadian Spill Services (WCSS) Spill Cooperative. WCSS asks its members to complete at least one of the following:

- Participate in at least one spill cooperative annual deployment exercise in the area of its operations (attendance of an exercise outside of the area where the approval holder operates is also acceptable).
- Area representatives have completed a spill response course (excluding online courses) or an on-scene spill commander course from a recognized training institution (this option cannot be used in consecutive years by the approval holder).

Spill Training Exercises

ARC Resources must conduct annual spill training in the area of its operation, involving the same field supervisory personnel and using the spill response equipment. ARC must notify the AER via the designated information submission system at least 30 days in advance of the training and provide the following information:

- The nature of the training exercise, the exercise date, and the legal land description of the land on which it will be conducted. Alberta Energy Regulator 18 Directive 071: Emergency Preparedness and Response (December 2025)
- A map showing the general topography, location of and access routes to the deployment area, and the location of any municipal water intakes within three kilometres of the deployment area.
- If the spill training exercise involves using a spill material, the approval holder must identify the proposed material and planned volume.

- Comments on the public use of the area, the collection and disposal of garbage, and a statement indicating the extent, if any, of anticipated surface disturbance to stream banks or shorelines at the test site.
- Confirmation of the training exercise occurring on private land, and whether the landowner agrees to the exercise proceeding at the proposed site.

5.0 Responding to an Emergency

5.1 Emergency Response Plans

Overview

ARC maintains Emergency Response Plans (ERPs) for all company operations. ERPs describe the response functions and emergency procedures that will be implemented should an emergency arise.

The ERP is activated based on provincial or federal (CER) Incident Classification criteria which can be found in the Incident Classification section of each ERP. The Incident Commander activates the emergency response plan and declares the initial incident classification. In addition, the provincial regulatory authority must be contacted to confirm the Emergency Level.

Types of Emergency Response Plans

There are four different types of Emergency Response Plans to cover requirements for Energy Regulators:

- Corporate Emergency Response Plan
- Drilling and Completions Supplemental or Site-Specific Emergency Response Plans (Sour/Critical Sour for Alberta and Sweet/Sour/Special Sour for BC)
- Sour Production Site-specific Emergency Response Plans
- Supplemental Emergency Response Plans (Primarily BC Operations)

ARC maintains two additional types of plans for other regulators:

- Emergency Response Assistance Plan (ERAP)
- Environment Canada Environmental Emergency Plans (E2)

ARC has multiple Area Operating ERPs and CEPA E2 Plans in place.

Additionally, ARC maintains office emergency response plans for both Corporate Head office and field offices as well as updates the Government of Alberta's Industrial Wildfire Control Plan annually.

Compliance with Regulations

ARC's ERPs define the organizational framework to effectively respond to any incident with potential to significantly threaten or adversely impact ARC, its subsidiaries, employees, operations, finances or reputation. The ERPs utilize Incident Command System (ICS) concepts to help facilitate mutual aid benefits with other agencies or organizations that are also trained to Incident Command.

ARC ERPs comply with regulatory requirements and provide information and guidelines for personnel involved in ARC's response to alert or emergency situations. The plans include:

- Description of the response organization structure

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- Notification and activation procedures
 - Clarification of emergency classification and appropriate responses
 - Duties and checklists for each response team position
 - Actions necessary to manage key stakeholder communications
 - Procedures to return incidents to normal
 - Documentation tools
 - Site-specific information & Resource listings
 - Key contacts
-

5.2 Standard ERP Format

ERP Format ARC has a standardized format for its plans. This standardization has the following benefits:


- Standardized training to enable corporate-wide support.
- Efficiency in the development of ERP documents.
- Assurance of compliance to regulatory and ARC’s response requirements

The scope of ARC’s Emergency Response Plans addresses all hazards including, but not limited to, the following situations:

- Medical Emergency
 - Motor Vehicle Accident
 - Sour Gas Release
 - Fire / Explosion
 - Petroleum and / or Hazardous Materials Spill
 - CEPA Product Environment Release (i.e. LPGs, NGLs or HVPs, etc.)
 - Next-of-Kin Notification
 - Natural Hazards
 - Wildlife Encounters
 - Mining
 - Security Incidents
 - Gas Turbines
 - Electrical Emergencies
 - Acid Gas injection Wells
-

5.3 Emergency Response Plan Types and Content

Corporate ERPs Site-Specific, Supplemental and Area Operating ERPs are generally prepared for **sour** operations that have members of the public working or living within the Emergency Planning Zone, all other operations are covered by the Corporate ERP.

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The Corporate ERP complies with Alberta and BC regulatory requirements. The Corporate ERP describes response functions and emergency procedures that would be implemented if an emergency event were to occur on company property, affects company operations; or has the potential to pose a risk to the company, contract personnel, public or the environment. The Corporate ERP is intended to address all hazards.

Site Specific ERPs

The Alberta Energy Regulator (AER) and the British Columbia Energy Regulator (BCER) have specific requirements in regard to the development of Site-Specific emergency response plans. Typically, these plans cover sour, Natural Gas liquids (NGL) and High Vapor Pressure (HVP) pipeline operations where people may cluster within an emergency planning zone, such as residents, businesses or campgrounds.

OH&S regulations require a written emergency response plan for responding to an emergency that may require rescue or evacuation.

Sites with CEPA products that meet threshold quantities and container capacity requirements must be compliant with Environment Canada Environmental Emergency (E2) Regulations and may require an E2 Plan for these products.

A Site-Specific ERP is required for any facility, well, or pipeline containing H₂S where a surface development (i.e. occupied dwelling, campground, public facility) is located within or egresses through the calculated EPZ.

In BC, Supplemental or Site-Specific ERPs are required for and sour well drilling and completion operations. The Supplemental ERP is an addendum to the Corporate ERP and contains details such as:

- Contact information of the wellsite personnel & key emergency contact information
- Affected land or lease user information as well as Rights holders
- A map showing the directions to the location
- Dates and timing related to the well and related H₂S release rate information.

Environmental Emergency Plans (E2)

Environment Canada has requirements for E2 plans to deal with the storage of certain volumes of regulated hazardous products such as NGL's/LPG's, chlorine, etc. Any operated area with an E2 registered substance must have a section in the site-specific emergency response plan outlining additional contact numbers, procedures and other special response/handling instructions as per the requirement of the E2 plan.

Emergency Response Assistance Program (ERAP)

Transport Canada has requirements for emergency response plans for transportation of Dangerous Goods. Prior to anyone offering for transport any Dangerous Goods requiring an ERAP (indicated in Column 7 of Schedule 1 of TDG regulations) they must have an associated Emergency Response Assistance Plan filed with and approved by Transport Canada.

ARC has an approved ERAP for Liquid Petroleum Gas (LPG)/Propane/NGL. In the event of a transportation accident or incident involving LPG/Propane/NGL being transported from the ARC site or the storage bullet, the ERAP is enacted by ARC through Emergency Response Assistance Canada (ERAC).

Office Emergency Response Plan	These plans are office specific and may include (but are not limited to) things such as building set-up, head counts, evacuation procedures, security, etc. to ensure a coordinated company response to all types of emergency situations.
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Industrial Wildfire Control Plans	<p>The Industrial Wildfire Fire Control Plan is a legislated requirement of the Forest Prairie Protection Act. The intent of the plan is to proactively identify assets, such as personnel, at risk and prevention strategies to reduce the negative impacts of Wildfire.</p> <p>The information provided by ARC will be used to enhance local knowledge and communications between Government of Alberta Forestry and Parks staff and the stakeholder/client, to effectively deal with strategies to reducing the negative impacts of wildfire.</p>
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5.4 Emergency Response and Capabilities Requirements

Response Team List	<p>ARC will use the Incident Command System (ICS) to direct, control and coordinate response operations</p> <p>Because the number of people and amount and type of equipment/services required to respond to an emergency varies, up-to-date Corporate and Field Response Team lists as well as lists of available services will be maintained for each operating area in its ERP.</p> <p>ARC ensures all listed Corporate and Field Response Team personnel who have a role in emergency response are trained and familiar with the role(s) they may be expected to play. This includes office staff such as Reception, Investor Relations, etc.</p>
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6.0 Regulatory & Legal Compliance

6.1 Monitoring the Regulatory Process

Regulatory Compliance	ARC strives to maintain regulatory compliance. This program is designed to be in accordance with all federal and provincial regulations. In addition, ARC is an active member of the CAPP Emergency Management Committee and tracks Emergency Management regulations through ARCs Legal Register. ARC’s Regulatory Change Management Process coordinates the throughout assessment of all pending and actual regulatory changes to ensure ARC remains compliant.
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Policies and Goals	ARCs Operational Excellence Policy outlines the commitment to ensure emergency response protocols are implemented that adequately reduce the risk to employees, contractors, stakeholders, the public, environment, and the process.
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Legal Requirements	ARC maintains a “legal registry” for identifying and monitoring compliance with both regulatory and legal requirements in addition to a documented process for Managing Regulatory change and identifying and resolving compliance related deficiencies.
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Monitoring Investigation & Reporting	<p>AIMS Incident, Emergency & Security Management Element provides detailed direction and procedures for incident and near miss reporting, investigation and follow-up. These procedures shall also be used when considering the cause(s) of any incident requiring emergency response and for the development, implementation and follow-up of corrective actions to prevent reoccurrence.</p>
Hazard Identification, Risk Assessment & Control	<p>ARC is committed to planning for all hazards / risks as well as potential hazards / risks that could reasonably impact our workers, facilities and infrastructure, the public, or the environment related to normal and abnormal operating conditions. This includes but is not limited to medical incidents, fires, spills, ruptures, releases, natural hazards, security incidents and well control incidents.</p> <p>All hazards, potential hazards, must be reported immediately to an ARC supervisor. ARC supports and encourages all personnel to report suspected incidents of non – compliance with any applicable law or regulation.</p> <p>Any personnel making a report will be given immunity from disciplinary action or retaliation for the reporting of health, safety, environmental or compliance related events.</p> <p>ARC’s process for risk management which includes items such as hazard / risk identification, assessment (based upon severity and likelihood of occurrence), control, reporting and communication of hazards / risks can be found in the AIMS Risk Management Element.</p> <p>As per the AER’s Directive 71, a Hazard Identification and Consequence Analysis will be conducted on ARC’s Alberta operations and the “Professional Declaration for Hazard Identification and Consequence Analysis” form is to be signed off by a licensed professional.</p> <p>As per the British Columbia OHSR Sections 5.99 and 5.1, a hazard inventory and risk ranking is to be completed for BC worksites.</p>

6.2 Consultation and Communication of Risk

Consultation and Communication of Risk	<p>ARC will ensure that all residents, businesses, industrial operations, and recreational property owners as well as those who must egress through an Emergency Planning Zone (EPZ), are provided with a public information package and have a personal consultation conducted to explain the hazards associated with the project and response requirements if there is an incident.</p> <ul style="list-style-type: none"> • Notification goes to nonresident landowners, farmers renting land who do not live on property, registered trappers, guides, outfitters, registered grazing lease and allotment users, rights holders, oil and gas operators with unmanned facilities and owners of rented residences that are within the EPZ. • Detailed public consultation requirements are outlined in AER Directive 71< Sections 33 – 35 of the CER Onshore Pipeline Regulations, and the BCER Consultation and Notification Manual. Information gathered from the public will be captured on a standardized form. Hard copies of information shall be kept in a secure room or locked cabinet and electronic copies of public
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information shall be password protected as per The Personal Information Protection Act (PIPA).

ARC’s public consultation standard, with regard to residents, calls for face-to-face consultations every two years with telephone consultations in the interim years and is carried out by an external contractor. This is how ARC conducts the annual public preparedness program.

Ground truthing of ARC’s EPZs is conducted on an annual basis using either a third party vendor or area operators to update the maps and capture any physical changes to the EPZs.

Government agencies and mutual aid organizations that may be involved in a response will be consulted and provided informational materials outlining the project, its risks and key contact numbers. Information gathered from the government agencies must be sufficient to establish:

- Key contact numbers to activate a response from the agency or organization;
- Contact names and phone numbers; and
- Confirm capabilities, roles and responsibilities.

6.3 Issue Documentation & Resolution Process

Issue Documentation & Resolution	<p>Issues arising from consultation will be properly recorded and promptly resolved. ARC’s Surface Land department assesses the nature of the issue, concern or commitment and prepares a timeline for resolution and identifies the responsible person.</p> <ul style="list-style-type: none"> • Any issues or concerns identified by potential stakeholders, or commitments made to stakeholders, must also be recorded, filed and immediately forwarded to ARC’s Program Coordinator. The Program Coordinator will track the resolution to ensure the item is closed on a timely basis.
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Sale of Property / Transfer of License	<p>If a well, facility, or pipeline with an ERP has been sold, the prospective approval holder involved in the license or approval transfer or amalgamation must submit a letter to the AER at Directive71@aer.ca notifying the AER of the incoming transfer within 30 days of the transfer of the license or approval, as well as discuss a timeframe for submitting a new ERP or an amendment to an existing ERP. The notification letter must include the following information:</p> <ul style="list-style-type: none"> • Confirmation of the 24-hour emergency contact number for the subject assets and the new approval holder’s primary contact information. • The anticipated submission date for either a new ERP or an amendment to an existing ERP. • List the ERP registration numbers for all operation-specific ERPs in effect during the transition period. If none of the existing operation specific ERPs will be used, the letter must provide the AER with a detailed interim plan that satisfies the ERP requirements for the transition period.
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Residents within the EPZ and the local authority must be notified of the change in ownership and be advised that the licensee will be conducting a public involvement

program as part of the development of a new ERP. The new licensee must ensure that the emergency response procedures in place will not be compromised prior to approval of the new ERP.

ARC will follow the protocols noted above any time they are a “new licensee” or “prospective approval holder”.

Management of Change

Changes to the Emergency Management Program will be made with the AIMS Change Management Process.

Review and approval of changes that relate to revisions to contact information and general wording clarifications are approved by the Program Coordinator. Changes that involve amendments to the overall processes outlined within this document must be approved by the Manager – OMS, Safety Programs and Regulatory.

ARC has also implemented a robust Management of Change program for identifying, managing and documenting changes to equipment/process, standards / procedures or organizationally that could have an impact on health and safety, environment or regulatory requirements.

Any changes to the EMP will consider the public and the environment, hazard ID and consequence analysis, the emergency management structure, and regulatory requirements.

All changes will be documented, approved, and implemented including communication of changes.

The process for this can be found in AIMS Management of Change Element.

7.0 Estimating External Community Exposure

Estimating Potential Exposure

ARC uses a combination of processes to estimate potential exposures off-site. These include but are not limited to Technical Data Management, Risk Assessment, Modelling and Emergency Planning Zone identification.

7.1 Technical Data Management

Technical Data Management

Technical data is the foundation of the Emergency Response Planning process. It determines the size of the EPZ. Technical data affects public engagement requirements and the geographic area to which an emergency response is directed. The consistency and quality in the preparation of this important data is essential in managing ARC’s reputational risk.

Technical data will be prepared under the supervision of a qualified professional engineer or other appropriate technical designation. This step ensures new projects are appropriately modeled to define the EPZ.

Once an EPZ is identified and plotted, ARC will assess whether the risk is acceptable. If community impact is potentially too extensive, ARC shall reassess the project design parameters and repeat the modelling and mapping cycle.

Once acceptable risk is defined, the technical data and maps will be forwarded to ARC’s Program Coordinator for integration into the site-specific Emergency Response Plan.

The Field Manager, Field Foreman, Production Engineer, and Program Coordinator assess risk acceptability. As the project moves forward, site personnel should monitor for changes

related to modifications or additions of wells or pipelines, changes in operating conditions and encroaching development. Material changes in any of these items may necessitate an update to the Emergency Response Plan or development of a new Emergency Response Plan.

ARC Technical Data Management Process

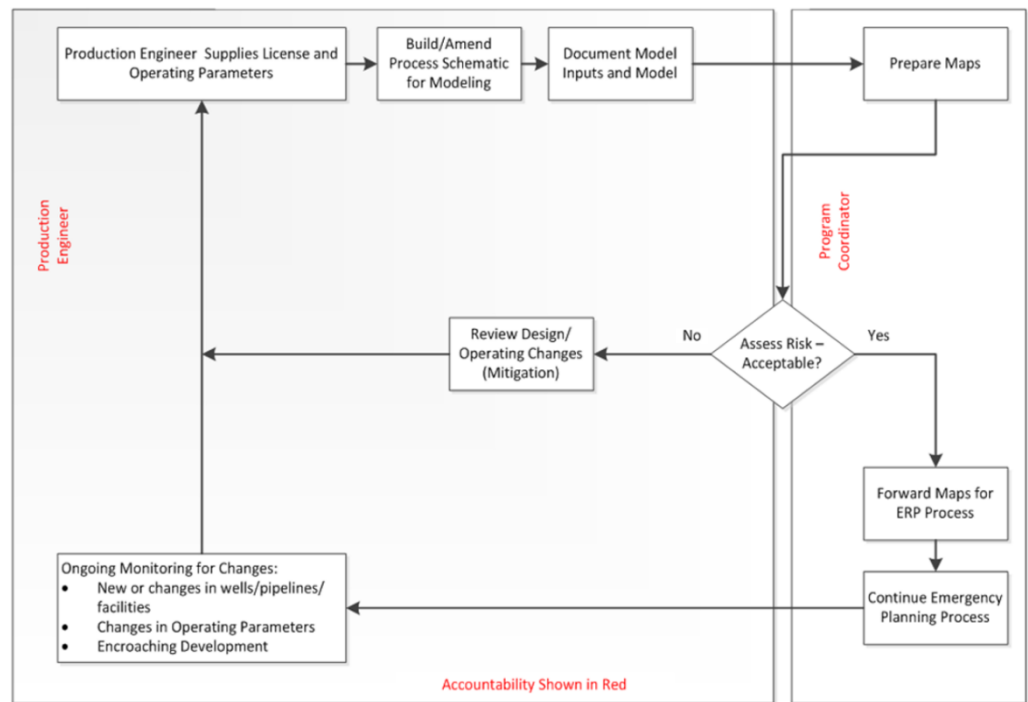


Figure 2: ARC Technical Data Management Process

7.2 H₂S Assessment for Wells

H₂S Assessment for Wells

Each of ARC’s drilling and completion operations shall have an H₂S Release Rate Assessment prepared in accordance with the Canadian Association of Petroleum Producers (CAPP) H₂S Release Rate Assessment Guidelines document.

For wells drilled in Alberta the latest version of AERH₂S Model will be used to determine the appropriate Emergency Planning Zone size. (Applies to Pipelines as well). The CSV file from the AERH₂S Model will be submitted to the AER.

For wells in British Columbia, EPZs are determined using the nomograph formulas found in the in the BC Emergency Management Regulation (2013) – Schedule A. **(Applies to Pipelines as well).**

Prior to drilling and completion, new wells must have Drilling H₂S Release Rates, Completion/Service H₂S Release Rates, and Suspended/Producing H₂S Release Rates prepared prior to the preparation of the well license or well authorization application. The higher of these release rates sets the category of the well for the application. The Suspended/Producing H₂S Release Rate also sets the level designation of the well for land-use setback restrictions.

- Once wells are tested and placed on production, the actual H₂S concentration and flow capability of the well should be reviewed. The Suspended/Producing H₂S Release Rate should be updated by the Production Engineer and forwarded to the

Program Coordinator to oversee the update of the technical data in the appropriate Emergency Response Plan.

- Existing wells must have representative Suspended/Producing H₂S Release Rates based on the actual flow data of the well.
- Prior to commencing workover operations on existing wells, the Servicing H₂S Release Rate should be reassessed if it has the potential to be materially different from the Suspended/Producing H₂S Release Rate.

7.3 H₂S Assessment for Facilities and Pipelines

H₂S Assessment for Facilities and Pipelines

New sour pipelines and facilities must be assessed to determine the H₂S Release Volume of the facility. The H₂S Release Volume sets the level of the facility for land-use setback restrictions.

Existing pipelines will be assessed annually to ensure the H₂S Release Volume calculations are based on actual operating and licensed conditions.

Mitigation opportunities, such as adjustment of the set pressure on the Emergency Shutdown Valve (ESD valve) or changes in license conditions, will be incorporated into the annual review.

Determination of the H₂S Release Volume and related Emergency Planning Zone starts with an understanding of the interconnectivity of the pipeline systems.

A schematic showing pipeline nodes is useful to ensure inputs into the pipeline model are correct and the model represents potential system drainage that could occur from a failure. A node is considered to be any of the following:

- An emergency shutdown valve (ESD) or check valve (CV).
- A junction.
- The start or endpoint of a pipeline segment, such as a well or facility.
- A change in operating condition or pipe dimension.

7.4 CEPA Product Assessments


CEPA Product Assessment

Environment Canada’s Environmental Emergency (E2) regulations apply to any person who owns or has the charge, management or control of a listed substance.

CEPA-regulated products in ARC production are primarily propane, butanes and LPG mixes.

A copy of the E2 Plan and related documents must be filed at the place where the products are stored.


E2 Plans for each facility must be tested at least once per year. An E2 plan exercise cannot be applied to more than one facility.

	<p>NOTE: When testing a facility E2 plan, there is opportunity to explore the difference of other facilities and discuss how the response would be different, provided that the responders for the other facility are</p>
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<p>present. An independent report can then be prepared and filed at the alternate location.</p>

The following guidelines apply for notices that must be submitted to Environment Canada:

- Notice of Identification of Substance and Place if either:
 - Maximum quantity equals or exceeds threshold; or
 - Largest container capacity equals or exceeds threshold.
- The Notice of Identification of Substance and Place must be filed within 90 days if either of the two criteria are met.
- Notice of Plan Preparation (to be filed within 6 months of the criteria being met) and Notice of Implementation and Testing (to be filed within 1 year of the criteria being met) required if both:
 - Maximum expected quantity equals or exceeds threshold; and
 - Largest container capacity equal or exceed the threshold.
- Notice of Closure or Decommissioning (within at least 30 days or as soon as feasible in the case of extraordinary circumstances).
- Amended Notice of Identification of Substance and Place must be filed within 60 days of any changes in information or increases in the maximum expected quantity greater than 10%.
- Notify the Minister if either the amount or container capacity criterion becomes less than the threshold quantity or below maximum capacity of the largest container (each set out in column 3 of Schedule 1) for 12 consecutive months.

	<p>NOTE: All notices submitted must be accompanied by an authorized official's signature (Schedule 3 – Certification).</p>
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A flammable mixture is reportable if it contains an E2 substance and it meets 4 criteria:

- E2 substance has a percentage concentration in the mixture of at least 1%;
- The flash point is less than 23°C;
- The boiling point is less than 35°C;
- The quantity of the flammable mixture is at least 4.5 tonnes.

If all 4 criteria are met – report the mixture as the highest concentration E2 substance (flammable mixture) and the applicable notices will be filed with the appropriate planning and testing to follow.

7.5 Transportation Risks

Transportation Risks

Part 7 of Transport Canada’s Transportation of Dangerous Goods Act, 1992 requires that before a person offers for transport or imports certain dangerous goods, the person must have an approved Emergency Response Assistance Plan (ERAP).

Column 7 of Schedule 1 as well as Part 7.1(2) - Emergency Response Assistance Plan of the Transportation of Dangerous Goods Regulations (TDGR) prescribe the dangerous goods and the concentration or quantity for which an ERAP is required.

Propane, butane, their isomers and LPG mixtures are listed in Column 7 of Schedule 1 and they require an ERAP.

Crude Oil and Condensate are not listed in Column 7 of Schedule 1 and therefore do not require ERAPs for transportation by tank truck.



NOTE: Transportation of Dangerous Goods Regulations requires a person importing or offering for transport dangerous goods (listed in SOR/2015-100) that include Crude Oil and Condensate by rail in a tank car must have an approved ERAP if the quantity of the dangerous goods in the tank car exceeds 10000 L.

ARC is a member of Emergency Response Assistance Canada (ERAC) (formally known as LPGERC) and through this membership have the benefits of a standby team to provide the expertise and resources to assist with any incident.

ARC will file the ERAP for approval with Transport Canada. The length of the approval will range from five to seven years for final approvals and one to three years for interim approvals.


Currently ARC has ERAPs for LPG/Propane. ARC will require leadership on location of an incident involving the transportation of these products.

ARC’s ERAP number and 24-hour emergency number are listed on all ARC TDG shipping documents.

7.6 Pipeline Incident Risks

Pipeline Incident Risks

Pipelines are modelled using the specific operating parameters of the pipeline with hazard assessment software or nomographs (BC). Pipeline EPZs will be mapped and consultation will be conducted where information, including risks, will be provided and communicated to any public inside the EPZ.

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8.0 Monitoring and Review

8.1 Audits and Inspections

Audits and Inspections

ARC’s Emergency Management Program is formally audited through the established processes outlined in ARC’s Operations Assurance Element.

Audit Protocols for management system audits or program compliance audits include requirements from external regulators such as AER, CER, and BCER. If deficiencies are identified, action items and timelines for completion are assigned to a responsible party.

ARC has an established process for conducting and documenting internal inspections to verify field compliance. Tools such as the Facility Inspection, Wellsite inspection and Roadblock Kits inspection have components that confirm EM program compliance at the field level. Each of the tools used allows for documentation of deficiencies as well as assignment and communication of responsibility and timelines for completion of required corrective actions to responsible parties.

8.2 ARC’s Integrated Management System Review Process

ARC’s Integrated Management System Review Process

ARC utilizes an Integrated Management System (AIMS) review process to analyze data and information from the following:

- Performance measures and KPIs
- Corrective and preventative actions from assurance activities and investigation learnings.
- Stakeholder feedback from field and office teams

The analysis of this information ensures that the highest risk opportunities are actioned and resourced accordingly. The AIMS review is an annual activity that occurs in the fourth quarter of each calendar year. Results from the AIMS review are used to populate an annual AIMS Plan which is approved and endorsed by Managers and Executives at ARC. AIMS review actions are assigned to employees, tracked to closure and reported out to Managers and Executives to enable continuous improvement of AIMS.

9.0 Document Control

Document Control

AIMS Document and Records Management Element outlines the framework and procedures for managing the preparation, review, revision / approval process, retention and control of ARC documents including Emergency Management.

Document Reviews

Reviews of the Program, legal and regulatory requirements are completed by the program coordinator annually and as required when regulatory changes occur.

9.1 ERP Document Control

ERP Document Control

The front of each plan (Section 0) includes a distribution list. Plan holders are responsible to apply updates to the physical binders when they are distributed.

When a plan is updated, the revision log is also updated, including a description of the changes as well as the impacted page numbers.

Each of the plans are numbered and assigned to a specific individual. The plans are marked as either Full or None. Full copies are confidential and contain public information that is not intended for general distribution and is provided only to those responders who will require the information to effectively complete their tasks.

Confidential copies are also secured so that they are available only in an emergency by responders. Non-confidential electronic copies of the Emergency Response Plans and associated maps are available on ARC's internal website.

A revision request process, that identifies errors or updates is forwarded to the appropriate responsible person.

10.0 Performance Measures

Overview Performance measures are used to evaluate whether we are meeting the Program objectives and to indicate overall health of the Program.

Leading Indicators Leading indicators required to be tracked and communicated on an ongoing basis include:

- Percent full scale emergency exercises completed (Completed vs. Planned)

Lagging Indicators Lagging indicators required to be tracked and communicated on an ongoing basis include:

- Percent of action items assigned from response exercises (Closed vs. Assigned)
- Number of external regulatory non-compliances received related to emergency management

Self Assessment Self-Assessments are utilized to verify compliance with regulatory expectations and are conducted by the Program Coordinator using the Emergency Management Program Self-Assessment Reporting form.

Correcting any deficiencies, gaps, and limitations identified during an EMP evaluation, self-audit, or management review within planned intervals or as requested by the regulator during a compliance review.


Considerations When Evaluating the EMP Management should consider the following when evaluating the EMP:

- Suitability of the current EMP performance standards
- Adequacy of the hazard identification and consequence analysis processes
- Adequacy of resources (e.g., financial, personnel, material, mutual aid)
- Effectiveness of the EMP evaluation process
- Results of the self-assessment
- The state of preparedness for emergencies (e.g., ERP, training, and exercise reports)

- The results of any investigations into incidents or emergencies
- The assessment of the effects of foreseeable changes to regulations or technology · emergency response arrangements and information sharing with appropriate authorities and municipal emergency service providers
- Emergency communication plans (internal and external)

11.0 External Reference Documents

External Reference Documents	Document / Tool Title
	AER Directive 071, 2026 02 02 – Emergency Preparedness and Response Requirements for the Petroleum Industry .
	AER Directive 056, 2014 05 01 – Energy Development Applications and Schedules
	AER Manual 026: Emergency Preparedness and Response Guide
	BCER Emergency Management Manual – April 2025
	BC Consultation and Notification Regulation 279-2010 with 2013 09 26 Amendments
	BC Emergency Management Regulation 204/2013
	Worksafe BC – Part 5 Chemical Agents and Biological Agents
	CSA Z246.1-13 – Security Management for Petroleum and Natural Gas Industry Systems
	CSA Z1600-14 – Emergency and Continuity Management Program
	CSA Z246.2-14 – Emergency Preparedness and Response for Petroleum and Natural Gas Industry Systems
	CSAZ662-15 – Oil and Gas Pipeline Systems
	Environment Canada Environmental Emergency Regulations (SOR/2003-307) – 2011
	Environment Canada Implementation Guidelines for the Environmental Emergency Regulations – 2011
	CER Onshore Pipeline Regulations SOR/99-294
	CER Guidance Notes for the Onshore Pipeline Regulations – Sections 32, 33, 34, 35, and Annex A
	CER Management System and Protection Program
	CER Letter - 2015 03 26 and Appendix A

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Transport Canada - Transportation of Dangerous Goods Regulations includes SOR/2016-95

Transport Canada – Transportation of Dangerous Goods Act, 1992

Personal Information Protection Act (PIPA)
