



# LEUCRØTTA

EXPLORATION INC.

## EMERGENCY MANAGEMENT PROGRAM

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## PROGRAM ADMINISTRATOR

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## REVISION HISTORY

Date of Issue	Reason for Revision	Section	Affected Pages
July 2018	New EMP Manual	ALL	ALL

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# 1 INTRODUCTION

## 1.1 PURPOSE

Leucrotta Exploration Inc. (Leucrotta) is committed to ensuring the safety of the public, their workers, and the environment. Leucrotta has developed, implemented and continuously maintains the Emergency Management Program (EMP) to effectively mitigate, prepare, respond and recover during an emergency that could adversely affect property, the environment or the safety of workers or the public. The EMP supports internal policies, reflects Leucrotta's company values and complies with relevant government regulatory requirements. The EMP is integrated with Leucrotta's Operating Management System, Programs and processes which are designed to prevent and mitigate releases.

Leucrotta Exploration acknowledges the benefit of implementing an integrated and coordinated approach to emergency management which aligns with our corporate mission of providing safe and reliable natural gas solutions. The purpose of this program is to:

- provide an integrated and coordinated approach between the emergency programs developed at various Functional Levels within the Company.
- ensure compliance with Provincial and Federal legislation regarding emergency programs and Leucrotta's participation in their development and operation.

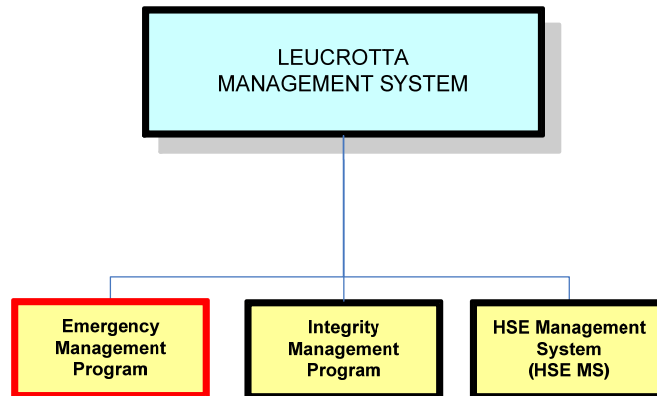
The EMP provides tools to implement an effective emergency management process for incidents arising from Leucrotta operations where Leucrotta has controlling authority. These tools address each of the four pillars of emergency management:



## 1.2 SCOPE

This document identifies the roles and responsibilities of those required to implement and maintain the EMP, referencing and referring to the other Leucrotta programs and site-specific plans that support it. Integration with other Leucrotta programs is key to successfully identifying and managing hazards, responding to incidents, and effectively communicating with stakeholders. The EMP works together with the following programs:

Figure 1



### 1.2.1 Regulations & Standards

This EMP & Leucrotta's Emergency Procedure Manual (EPM) (referred to as Emergency Response Plan – ERP) have been designed to align with industry best practices to meet the following applicable regulatory requirements:

- National Energy Board (NEB) – Onshore Pipeline Regulations
- Alberta Energy Regulator (AER) – Directive 071: Emergency Preparedness & Response Requirements for the Petroleum Industry
- BC OGC Emergency Management Regulation
- BC OGC Emergency Management Manual
- Canadian Standards Association (CSA):
  - CSA Z246.1: Security Management for Petroleum and Natural Gas Systems
  - CSA Z246.2-14: Emergency Preparedness & Response for Petroleum and Natural Gas Industry Systems
  - CSA Z662: Oil and Gas Pipeline Systems
- Canadian Environmental Management and Protection Act

### 1.3 GOALS & OBJECTIVES

The Leucrotta Emergency Management Program goals, objectives, and targets (GOT) as well as all the other Program documents GOTs have been developed to meet overarching corporate strategies.

- **Integrity Management Program** - to maintain the safety and reliability of gas pipelines and other materials that form part of the high-pressure pipeline asset to keep the public and Leucrotta employees and contractors safe. Application of Nondestructive Testing (NDT) to evaluate the properties of a material, component or system without causing damage.
- **HSE Management System (HSE MS)** - includes Policies, Standards, Code of Practice, Exposure Control Plans, Safe Work Practices and Safe Operating Procedures related to the conditions, potential hazards, or equipment involved that must be consulted and followed prior to carrying out work.

### 1.4 PROGRAM COORDINATION & RESPONSIBILITIES

#### 1.4.1 Accountable Officer

Leucrotta has appointed an Accountable Officer (VP Operations & COO) who has the appropriate authority to commit financial and human resources to ensure Leucrotta meets its obligations for safety, security and protection of the environment. The Accountable Officer has signed a statement accepting the responsibilities of this position. Leucrotta will notify the NEB of any changes made in the position of the Accountable Officer within 30 days.

This document shall be reviewed and updated at least annually. The updated document will be submitted to the accountable officer annually for review and approval. This annual update includes key objectives for the following year:

- First Responder Training
- Emergency Response and ICS Exercises
- Incident Review for Continual Improvement
- HSE Management System for Continual Improvement
- Emergency Procedures Manual (EPM)

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### 1.4.2 Program Coordinator

Leucrotta has appointed a Program Coordinator who is responsible for implementing & maintaining the EMP.

#### TABLE OF EMP & EPM RESPONSIBILITIES

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## 1.5 DOCUMENTATION & DOCUMENT CONTROL

The following documents support Leucrotta's EMP:

1. Leucrotta EPM Organizational Chart – maintained by H<sub>2</sub>Safety Services Inc.
2. Leucrotta EPM Overview Map – maintained by H<sub>2</sub>Safety Services Inc.
3. Leucrotta EPM Timeliness – maintained by H<sub>2</sub>Safety Services Inc.
4. Leucrotta 3-Year EPM Plan – maintained by H<sub>2</sub>Safety Services Inc.
5. Leucrotta 3-Year Exercise & Training Schedule – maintained by H<sub>2</sub>Safety Services Inc.
6. Leucrotta Training & Exercise Program – maintained by H<sub>2</sub>Safety Services Inc.

The first 6 documents are maintained by H<sub>2</sub>Safety Services Inc. and are updated at least monthly to ensure they are current. Plan amendments are provided to Leucrotta's EMP Program Coordinator who redistributes them to Leucrotta personnel as required.

7. Leucrotta Emergency Procedures Manual (EPM) – maintained by H<sub>2</sub>Safety Services Inc.

Per AER requirements, Leucrotta's EPM is reviewed on a semiannual basis by the appropriate EMP Program Coordinator to ensure that the information remains accurate. Changes to the EPM could also be identified during training exercises or incidents or they could be submitted by Leucrotta staff using the Revision Request Form located within the EPM. Updates to the EPM could be triggered by some or all of the following:

- Changes to current emergency information
- New mapping information
- New resident information
- Changes to response staff information or response capabilities
- Facility additions such as well or pipeline tie-ins

Minor updates may be documented and rolled into the next EPM update. Significant updates may be distributed via an update package to all plan recipients or a new EPM may be issued depending on the extent of the revisions. These remaining documents are reviewed and updated at least annually:

8. Leucrotta HSE Management System – maintained by H<sub>2</sub>Safety Services Inc.
9. Leucrotta Integrity Management Program – maintained by Leucrotta Exploration Inc.
10. Corporate policies, processes & procedures – maintained by Leucrotta Exploration Inc.

Leucrotta's internal policies, processes & procedures are reviewed for updates at least annually and updates are completed and distributed amongst Leucrotta staff, as required.

## 1.6 RECORDS MANAGEMENT

### 1.6.1 Preparation

Training & exercise records are kept and may include some or all of the following: date of the exercise, attendance list, scenario, worksheets, controller packages, positive observations, opportunities for improvement/recommendations, action items and other associated documentation.

### 1.6.2 Emergency Response Equipment

Leucrotta regularly inspects all emergency communications systems and response equipment (i.e. fire response equipment, respiratory protective equipment, roadblock kits) and warning systems (i.e. gas detectors for H<sub>2</sub>S and LEL) to ensure they are maintained to manufacturers specifications. Leucrotta maintains records of all inspections.

### 1.6.3 Response

Leucrotta utilizes Incident Command System (ICS) Forms located in the Emergency Procedures Manual (EPM) to document incident details and response actions taken to manage emergencies. Following the incident, the final report will include applicable ICS Forms.

### 1.6.4 Debrief

Details of any debrief meetings are documented and included as part of the incident report.

### 1.6.5 EMP & EPM Improvements

The Leucrotta Emergency Management Program (EMP) and Emergency Procedures Manual (EPM) contain a revision history that documents all of the updates/revisions/improvements made.

## 1.7 PROGRAM EVALUATION AND CONTINUAL IMPROVEMENT

### 1.7.1 Management Review

Leucrotta's Senior Management annually completes a review of the EMP to ensure its suitability, adequacy and effectiveness and submits the results of the review to the Program Coordinator.

The review confirms whether:

- The EMP is fully implemented
- The EMP meets Leucrotta's policy and objectives
- The EMP is adequate for its intended purpose
- Where improvements are required

The review addresses the following:

- Suitability of the current policy, goals, and objectives
- Setting objectives in the forthcoming period
- 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 audits
- The state of preparedness for emergencies (e.g., emergency procedures plan, training, and exercise reports)
- The output of any investigations into accidents, incidents, or emergencies
- The assessment of the effects of foreseeable changes to legislation or technology
- The emergency response arrangements and information sharing with municipal emergency service providers
- Emergency communication plans (internal and external)

Data sources to review should include:

- Results of audits
- Corrective and preventive actions carried out since the previous year
- Reports of emergencies and incidents (whether actual or staged for exercises)
- Reports from individual line managers on the effectiveness of the EMP locally
- Reports on hazard identification, risk assessment, and consequence analysis

### 1.7.2 Program Coordinator Review

Leucrotta's Program Coordinator annually completes a review to analyze the performance of the EMP. The Program Coordinator reviews the results of the Senior Management Review of the EMP and conducts their own evaluation which includes but is not limited to the ensuring following:

- Policies, goals, and objectives exist and are still applicable.
- All of Leucrotta's operations are covered by an appropriate EPM and that each plan is current.
- Leucrotta's EMP & EPM meet legislation and best practices including reviewing the impact of new regulations released in the last year.
- Hazard identification and consequence analysis results are current including:
  - All sour assets have calculated Emergency Planning Zones (EPZs).
  - An accurate inventory exists of facilities that need to be registered with Environment Canada, all registrations are up-to-date, hazard zones have been calculated for each site, the appropriate public notifications have been completed and the required Environmental Emergency Plans are in place.
- The review and update scheduled identified under Documentation & Document Control has been followed.
- Exercise and training program is being followed and training records exist.
- That lessons learned and action items from post exercise debriefs or incidents are being tracked, implemented and communicated.
- Opportunities for improvements and action items from previous EMP reviews have been addressed.
- Review the effectiveness of any changes that were implemented in the EMP over the past year.

### 1.7.3 External Audit

Leucrotta shall engage H<sub>2</sub>Safety to complete a formal audit on the EMP every three (3) years.

### 1.7.4 Addressing Deficiencies

All deficiencies, gaps, and limitations identified during any EMP evaluation, audit, or management review shall be assigned to a specific person to complete with a due date and shall be corrected within the specified time frames.

## 1.8 MANAGEMENT OF CHANGE

Changes to the EMP may be required due to regulatory changes, major organizational changes, requests utilizing the Revision Request Form or may be required as a result of an EMP evaluation or audit. All changes will be approved by the Program Coordinator to ensure they are suitable to the program. The Program Coordinator will consult with the Accountability Officer as required in making these decisions and follow the prescribed Management of Change, Safe Work Practice and associated MOC Forms. Updates to the EMP will be completed by H<sub>2</sub>Safety Services upon request from the Program Coordinator. The Program Coordinator will ensure the updated EMP is distributed to and that any major changes are communicated to Leucrotta personnel as required. The effectiveness of the changes will be required as part of the annual Program Evaluation completed by the Program Coordinator.

## 2 PREVENTION & MITIGATION

### 2.1 HAZARD IDENTIFICATION AND CONSEQUENCE ANALYSIS

Leucrotta conducts risk and hazard assessments for all its business operations to identify foreseeable risks and hazards to people, property and the environment. Risk and hazard assessments are reviewed regularly to consider changing circumstances and are used in all stages of the asset's life cycle to make decisions that influence design, construction, operation and decommissioning. This process encompasses hazard and risk recognition, analysis, assessment, remedy, examination and review, and communication and consultation. Leucrotta's risk management methodology reduces the likelihood of emergencies and their potential impacts.

The steps generally include:

- 1) Recognizing potential hazards
- 2) Implementing preventive measures (smart pigs, cathodic protection, participation in local "one-call" organizations, ground disturbance, facility integrity programs)
- 3) Incorporating detection abilities (SCADA, fire eye, etc.)
- 4) Applying mitigation (ESDs, control room procedures, and plant control systems)
- 5) Calculating Emergency Planning Zones (EPZs) & Hazard Planning Zones (HPZ), see below
- 6) Identifying the potential impact on the public & the environment of an incident in that location
- 7) Completing stakeholder involvement within the EPZs & HPZs
- 8) Incorporating stakeholder feedback following liaison activities
- 9) Arranging for equipment, resources and response procedures to protect the public, the environment and remedy the situation in the event of an incident

Based on the type of operations and the geographic location of Leucrotta's assets they pose the following risks to the public & the environment:

- Release and ignition of gas
- Release and ignition of NGL or LPG
- Release of crude oil into a waterbody or environmentally sensitive areas
- Release of sour gas in a populated area

The following poses potential risks to Leucrotta's wells, pipelines, facilities & onsite storage tanks/vessels. Preventative measures are identified below each risk.

- Weather such as heavy rainfall, flooding and land movement
  - Monitor weather conditions to ensure prompt response
- Corrosion, construction defects and cracking
  - Inspection protocols
  - Preventative maintenance program
  - Asset integrity management
  - Smart PIGS
  - Quality management program
  - Cathodic Protection
  - NDT (Non-Destructive Testing)
    - Ultrasonic Testing
    - Internal Testing
    - External Testing
    - Proper Insulating
    - Vessel Coating
    - Vessel Inspections

- PSV Serviced Regularly
- ESD (Emergency Shut Down) Testing
- Damage caused by construction or excavation often not related to pipeline activity
  - Public education program: educating those that live & work in the area
- Human Factors
  - Equipment & lines are clearly identified
  - Detailed operating procedures
  - Education & training
  - Competency checks
  - Clean work areas
  - Supervisors present
  - ABSA (Alberta Boilers Safety Association) Compliance
  - SWA (Stop Work Authority)
  - Car Seal Program
- Deliberate acts by terrorists, countries at war, vandals, or illegal dumpers
  - Fences & barriers (concrete, pole, guards, etc.)
  - Tank farms
  - Retention basin (good size, watertight, capacity, etc.)
  - Restricted areas
  - Security systems
  - Security cameras
  - Personnel on-site 24 hours / day
  - Signage
  - Use of piles
  - Bullets installed away from high traffic areas

## 2.2 EMERGENCY PLANNING ZONES (EPZs)

### 2.2.1 Alberta

EPZ Calculations are completed for any well, pipeline or facility with hydrogen sulphide (H<sub>2</sub>S) concentration of 0.1 moles per kilomole (mol/kmol) (0.0001 mole fraction or 100 ppm). The EPZs are calculated using the ERCBH<sub>2</sub>S model.

### 2.2.2 British Columbia

EPZ Calculations are completed for any sour well, pipeline or facility. The EPZs are calculated using the nomograph method. All Hazards Calculations are completed for any sweet well or pipeline utilizing RMP Comp or Aloha software modelling tools to determine an EPZ for onsite storage tanks/vessels.

### 2.2.3 HVP Pipelines

Leucrotta will utilize the table below to determine EPZs for HVP pipelines.

Pipeline Size		Mix	Ethylene
3"	88.9mm	250m	250m
4"	114.3mm	300m	350m
6"	168.3mm	500m	550m
8"	219.1mm	700m	750m
10"	273.1mm	900m	1000m
12"	323.9mm	1100m	1200m
16"	406.4mm	1600m	1600m

### 2.2.4 Sweet NEB Pipeline EPZs

Hazard Planning Zones (HPZs) for sweet NEB pipelines are calculated utilizing RMP Comp or Aloha software modelling tools to determine an EPZ.

### 2.2.5 Facility EPZs

The EPZ of a facility is the largest EPZ of any pipelines entering or leaving the facility. If the facility has a sour well on site, the EPZ for the well may determine the size of the EPZ for the sour production facility.

### 2.2.6 Environment Canada Facilities

Leucrotta will assign the larger of the calculated zone utilizing RMP Comp software and a 1600m zone.

## **3 PREPAREDNESS**

### **3.1 EMERGENCY PROCEDURES MANUAL (EPM)**

Leucrotta has developed the following EPM (Referenced as Emergency Response Plan – ERP):

- Northeast BC Emergency Response Plan (OGC)

Refer to Leucrotta’s EPM Organizational Chart and EPM Overview Map for more information.

#### **3.1.1 Equipment**

Leucrotta maintains adequate emergency response equipment. Information on site-specific safety equipment and its location is available within the EPM. If additional equipment is required, it can be obtained from local supply & service companies listed within the site-specific EPM.

#### **3.1.2 Hazard Monitoring**

Leucrotta maintains adequate monitoring equipment. Information on site specific monitoring equipment and its location is available within the EPM. At the onset of an incident Leucrotta would contact mobile air monitoring companies to mobilize to the incident site to record air quality monitoring readings in parts per billion (PPB). Leucrotta would also monitor local weather and news to remain informed of any other potential hazards (wildfire, flooding and other natural disasters).

#### **3.1.3 Mutual Aid**

Leucrotta assess the need for mutual aid on a case by case basis and, where considered necessary, ensures that understandings are established. Any information regarding mutual aid understanding(s) will be referenced within the Leucrotta EPM.

### **3.2 STAKEHOLDERS WITHIN AN EPZ**

#### **3.2.1 Consultation with Surface Developments**

Leucrotta consults with surface developments (residences, businesses, public facilities, etc.) located within its EPZs, located within 25m of its EPZs or located on a dead-end road requiring egress through the calculated EPZ. During the face to face consultation which is conducted every two years, a Public Awareness Pamphlet is provided to each surface development. Emergency contact information is gathered and the roads in the area are ground truthed to identify any changes to new and/or existing surface developments. The Public Awareness Pamphlet and consultation meets all applicable regulatory requirements.

#### **3.2.2 Notification of Area Users & Rights Holders**

Leucrotta notifies area users & rights holders (oil & gas, trappers, guides & outfitters, irrigation districts, etc.) and provides them with a Public Awareness Pamphlet annually.

#### **3.2.3 Landowners / Excavators / Contractors**

Leucrotta has developed a Pipeline Safety Awareness pamphlet for its NEB regulated pipelines and provides it to any landowners / excavators / contractors. The pamphlet includes information on identifying pipeline markers, contacting Call Before You Dig, contacting Leucrotta, identifying a leak and what to do if contact is accidentally made with a pipeline.

### **3.3 EXTERNAL AGENCIES**

#### **3.3.1 Alberta**

The AER requires government consultation to be completed with the local authorities (County, M.D., City, Town Village, First Nations Reserve) and health services if there are surface developments located within an EPZ. Leucrotta provides each agency with an informational pamphlet and consults with these external agencies annually to determine their roles & responsibilities for inclusion in the EPM, the location of their EOC, whether they are willing to establish a single Regional Emergency Operations Centre (REOC) in the event of an incident, the location of the reception centre(s) and what level of involvement they would have in coordinating evacuation within their boundaries. Leucrotta provides a copy of their EPM in electronic and/or hard copy format to the required government agencies. External agencies are invited to attend Full Mobilization exercises, as required.

#### **3.3.2 British Columbia**

The OGC requires the local authorities (R.D., City, Town Village, First Nations Reserve), the Government of Canada, if an existing building or structure owned by the government of Canada is within the EPZ & the Ministry of Transportation, if an arterial or municipal highway is within the EPZ, be provided with specific information about the operations. Leucrotta provides each agency with an informational pamphlet and completes government consultation annually with EMBC, the local authorities, the health authority & the Government of Canada & the Ministry of Transportation if required, to determine their roles & responsibilities for inclusion in the EPM. Leucrotta provides a copy of their EPM in electronic and/or hard copy format to the required government agencies. External agencies are invited to attend Full Mobilization exercises, as required.

#### **3.3.3 National Energy Board (NEB)**

The NEB requires the establishment and maintenance of liaison with the agencies that may be involved in an emergency response on the pipeline and consult with them in developing and updating the EPM. Leucrotta completes government consultation as outlined above under Alberta & British Columbia and consults with the RCMP, local emergency services (fire and ambulance). Leucrotta provides a copy of their EPM in electronic and/or hard copy format to the required government agencies.

The NEB requires a continuing education program for police, fire departments, medical facilities, other appropriate organizations and agencies and the public residing adjacent to the pipeline to inform them of the location of the pipeline, potential emergency situations involving the pipeline and the safety procedures to be followed in the case of an emergency. Leucrotta consults with the government agencies and first responders as indicated above and also provides them with an informational pamphlet that contains information on the location of the assets, potential emergency situations and safety procedures to be followed.



### **3.3.4 Environment Canada**

Environment Canada strongly recommends including local, provincial and federal response authorities in the development and preparation of plans and also share the content of the plan with these organizations. For its Environment Canada regulated facilities, Leucrotta annually provides an informational pamphlet to the local authorities, the fire department and the RCMP during the development or update of the Environmental Emergency Plan. Leucrotta also provides them with a copy of the completed Environmental Emergency Plan that contains emergency response information and information regarding the regulated substance tanks/vessels. Leucrotta invites local response authorities to observe at the exercises where feasible.

## **3.4 TRAINING & EXERCISES**

### **3.4.1 Training Program**

Leucrotta has identified Incident Command System (ICS) positions within its organizational structure that are likely to fill specific emergency response roles in the event of an incident and each emergency response role has training that is required of it. Refer to Leucrotta Training & Exercise Program for more information.

### **3.4.2 Training & Exercise Schedule**

Leucrotta maintains a training schedule that spans the next three years and identifies the regulatory required exercises as well as the competency based on training that is required to ensure that Leucrotta staff are qualified to fulfill predetermined emergency response roles. Refer to Leucrotta 3 Year ERP Program for more information.

### **3.4.3 Alberta**

The AER requires an annual table top exercise to be conducted for each regulated Area ERP and a full mobilization exercise to be conducted every three years. External agencies are invited to attend Full Mobilization exercises; as required.

### **3.4.4 British Columbia**

The OGC requires an annual table top exercise to be conducted for each regulated Area ERP and a full mobilization exercise to be conducted every three years. External agencies are invited to attend Full Mobilization exercises; as required.

### **3.4.5 Environment Canada**

Requires an annual table top exercise to be conducted for each registered facility. The exercise must involve the registered tank / substance. Leucrotta invites local response authorities to observe at the exercises where feasible.

### **3.4.6 National Energy Board**

Emergency response exercises should:

- Be held with sufficient frequency. At least one simulated exercise annually (e.g., tabletop, functional) and a full scale exercise (involving all agencies identified in the company's liaison) should be held at least every three years;
- Be varied to confirm that all aspects of potential emergencies are tested ; and
- Simulate a wide range of potential geographic and weather conditions as well as worse-case spill or gas release scenarios.

## 4 RESPONSE

### 4.1 INCIDENT MANAGEMENT SYSTEM

#### Incident Command System (ICS)

Leucrotta utilizes the Incident Command System (ICS) for its field responders. ICS is a standardized management system for effective command, control, and coordination of emergency response providing a common operability for first responders from multiple agencies to communicate and be effective.

#### Command and Coordination Centres

Leucrotta identifies primary and alternate Incident Command Post (ICP) locations and Reception Centres within the site-specific section of its EPM.

### 4.2 INTERNAL COMMUNICATIONS

Leucrotta's EPM contains the following communication procedures / processes:

- An internal notification flowchart that outlines who will receive communication in the event of an incident & an Initial Emergency Report form that identifies what information is to be communicated.
- Each of the role description identifies communications protocol for that specific role (i.e. what to communicate and to whom) and refers each role to specific forms to assist them with documenting and communicating information pertinent to their role.
- Meeting agendas (i.e. operations meeting, planning meeting, etc.) identifying who should attend each meeting and what information should be communicated.
- A chart that shows how communication will take place between the various Command Posts established for an incident.
- The Public Information Officer (PIO) role who is responsible for preparing the regular status updates that will be provided to internal company personnel, external stakeholders and media to keep them apprised of the situation.

### 4.3 EXTERNAL COMMUNICATIONS

Leucrotta's EPM contain the following communication procedures / processes:

- An external notification flowchart that outlines which external responders will receive communication in the event of an incident.
- An assessment matrix that classifies the incident and allows Leucrotta to consistently communicate the severity if the incident.
- A site-specific list of local external responders and their emergency contact numbers.
- The Liaison Officer role who is responsible for notifying government agencies and is the contact for agency representatives assigned to the incident by assisting or cooperating agencies.

## 4.4 MEDIA

Leucrotta's EPM contain the following communication procedures / processes:

- A media section that outlines media relations processes, media management processes, provides a generic media statement, reviews the role of the on-site media spokesperson & discusses managing the media on-site at an incident.
- The Public Information Officer (PIO) role who is responsible for developing and releasing information about the incident to the news media.

## 4.5 COMMUNICATION WITH STAKEHOLDERS

Leucrotta gathers emergency contact information for surface developments (residences, businesses, public facilities, etc.) located within its EPZs, located within 25m of its EPZs or located on a dead-end road where they would have to egress through its EPZs. In the event of an incident members of the public would be notified via one of the following methods:

- Personal phone call utilizing contact lists contained within the EPM
- Door to door notification where the number of surface developments is low and where notifying personnel this way won't put anyone at risk.
- Rovers or Roadblock personnel who would be attempting to locate transients and isolating the hazard area or any surface developments unresponsive to phone calls.
- Via emergency notification from the local authority

## 4.6 RESPONSE PRIORITIES

Leucrotta utilizes the following response priorities:

People – employees, members of the public, assisting external agencies, etc.

Environment – water, land, air, animals / wildlife, etc.

Assets – equipment, property, infrastructure, etc.

Reputation – media, corporate good will, local residents / towns, public opinion, etc.

## 4.7 COMMAND & COORDINATION CENTRE ACTIVATION

The Leucrotta EPM contains procedures for activating and setting up its Incident Command Post as well as communication protocols between the various Leucrotta and external agency Emergency Operations Centres (EOCs).

## 4.8 INCIDENT ACTION PLAN

The Leucrotta EPM contains forms and procedures to assist with develop an Incident Action Plan (IAP) that is specific to the emergency.

## 4.9 SAFETY

The Leucrotta EPM contains roles for:

- Site Safety who is responsible for responder safety and safety advice at all times at the scene of the emergency / incident.
- The Safety Officer who develops and recommends measures for assuring personnel safety, and assesses and / or anticipates hazardous and unsafe situations.

#### **4.10 PUBLIC SAFETY**

Leucrotta completes government consultations with local authorities and health services in the areas where there are surface developments located within its EPZs. This ensures that public safety actions will be coordinated with the local authorities during an incident.

#### **4.11 RESPONSE MOBILIZATION**

Leucrotta utilizes H<sub>2</sub>Safety's 24-Hour Emergency Response support services. Training ICS responders support Leucrotta in their Corporate Emergency Operations Centre (EOC) to assist with response actions to the Field Response Team (FRT).

#### **4.12 DEACTIVATION & DEBRIEFING OF THE RESPONSE**

Procedures exist within the EPM to standing down the level of emergency. The level of emergency will be stood down in coordination with the applicable regulatory agency. Leucrotta will debrief in accordance with the Post Incident section of their EPM.