

EMERGENCY MANAGEMENT PROGRAM

Whitecap Resources Inc. 3800, 525 – 8 Avenue SW Calgary, AB T2P 1G1

> Email: <u>info@wcap.ca</u> Phone: 403-266-0767

Fax: 403-266-6975

AB/SK 24 Hour #: 866-590-5289 BC 24 Hour #: 250-787-3700





This page has been intentionally left blank.



EMERGENCY MANAGEMENT PROGRAM

PROGRAM ADMINISTRATOR

TITLE AND COPYRIGHT

This Whitecap Resources Inc. 'Whitecap' Emergency Management Program Manual is for the use of Whitecap personnel only. No part of the Program Manual may be reproduced in any form by any photographic, electronic, mechanical or other means, or used in any information storage and retrieval system without written permission of the Whitecap Health, Safety & Environment Department.

All information in this manual is considered company confidential.



REVISION REQUEST FORM

Plan Holder Name / Title:
Manual Number:
If any of the following items have changed, please check the box beside it and provide a description of the change in the space provided.
☐ Company information☐ Policy and/or Procedures☐ Other
Description of the change:
Please attach additional pages and / or support documentation as required.
Please return the completed checklist to:
Whitecap Resources Inc. 3800, 525 – 8 th Avenue SW Calgary, AB T2P 1G1
Email: mike.nerbas@wcap.ca
Fax: 403-266-6975



REVISION HISTORY

Date of Issue	Reason for Revision	Section	Affected Pages
February 2022	 Reviewed Emergency Management Program Updated 1.2.1 Regulations & Standards Updated 3.1 – Emergency Response Plan (ERP) 	Sections 1 & 3	Pages 9 & 18
Reviewed Emergency Management Program Updated 1.5 – Documentation & Document Control Updated 1.6 – Records Management Updated 2.2 – Emergency Planning Zones (EPZ) Updated 3.1 – Emergency Response Plan (ERP) Updated 3.2 – Stakeholders within an EPZ Updated 3.4 – Training & Exercises Updated All of Section 4		AII	AII
April 2020	Reviewed Emergency Management Program – no changes required		N/A
November 2019	Create Emergency Management Program		All

DISTRIBUTION LIST

WHITECAP - EMERGENCY MANAGEMENT PROGRAM

Туре	Branch	Title/Agency	Name	
Corporate				
Digital	Calgary	VP, HSE	VP, HSE	

1 Digital Corporate Manual



TABLE OF CONTENTS

PROGRAM ADMINISTRATOR REVISION REQUEST FORM REVISION HISTORY DISTRIBUTION LIST TABLE OF CONTENTS

1.	INTRO	DDUCTION AND PROGRAM OVERVIEW	9
	1.1	PURPOSE	9
	1.2	SCOPE	9
	1.3	GOALS & OBJECTIVES	9
	1.4	PROGRAM COORDINATION & RESPONSIBILITIES	10
	1.5	DOCUMENTATION & DOCUMENT CONTROL	11
	1.6	RECORDS MANAGEMENT	12
	1.7	PROGRAM EVALUATION AND CONTINUAL IMPROVEMENT	13
	1.8	MANAGEMENT OF CHANGE	14
2.	PREVE	ENTION & MITIGATION	15
	2.1	HAZARD IDENTIFICATION AND CONSEQUENCE ANALYSIS	15
	2.2	EMERGENCY PLANNING ZONES (EPZs)	16
3.	PREP <i>A</i>	AREDNESS	18
	3.1	EMERGENCY RESPONSE PLAN (ERP)	18
	3.2	STAKEHOLDERS WITHIN AN EPZ	18
	3.3	EXTERNAL AGENCIES	19
	3.4	TRAINING & EXERCISES	20
4.	RESPO	ONSE	22
	4.1	INCIDENT MANAGEMENT SYSTEM	
	4.2	INTERNAL COMMUNICATIONS	23
	4.3	EXTERNAL COMMUNICATIONS	23
	4.4	MEDIA	23
	4.5	COMMUNICATION WITH STAKEHOLDERS	24
	4.6	RESPONSE PRIORITIES	24
	4.7	COMMAND & COORDINATION CENTRE ACTIVATION	24
	4.8	INCIDENT ACTION PLAN	24
	4.9	SAFETY	25
	4.10	PUBLIC SAFETY	
	<i>I</i> 11	DEACTIVATION & DERRIFFING OF THE RESPONSE	25



1 INTRODUCTION AND PROGRAM REVIEW

1.1 PURPOSE

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

1.2 SCOPE

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



1.2.1 Regulations & Standards

This EMP & Whitecap's Emergency Response Plans (ERP) are designed to meet the following applicable regulatory requirements:

- Canadian Energy Regulator (CER) Onshore Pipeline Regulations SOR/99-294
- Alberta Energy Regulator (AER) Directive 071, February 2017 (Emergency Preparedness & Response Requirements for the Petroleum Industry)
- BC Emergency Management Regulation 217/2017
- BC Emergency Management Manual Version 2.3 November 2021
- Canadian Standards Association (CSA):
 - CSA Z246.2-18 (Emergency Preparedness & Response for Petroleum and Natural Gas Industry Systems)
 - o CSA Z1600-17 (Emergency & Continuity Management Program)
- Environment Canada Environmental Emergency Regulations (SOR/2019-51)
- Canadian Environmental Protection Act 1999 (CEPA 1999)



1.3 GOALS & OBJECTIVES

The Whitecap Emergency Management Program has established the following:

- Meet or exceed all regulatory requirements
- Prevent as many incidents as possible from occurring
- Prevent any incidents that do occur from turning into larger incidents
- Ensure Whitecap personnel are trained and prepared to respond to emergencies
- Develop a partnership with local first response agencies and local authorities to ensure a unified and coordinated response to any incidents
- Following an incident, restore the affected area back to pre-incident conditions
- Continuous learning and improvement of the Emergency Management program

1.4 PROGRAM COORDINATION & RESPONSIBILITIES

1.4.1 CFR Accountable Officer

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



1.4.2 OGC Program Coordinator

Whitecap has appointed a Program Coordinator who is responsible for implementing & maintaining the EMP. The name and contact information of the Program Coordinator has been submitted to the commission. Whitecap will notify the OGC of any changes made in the position of the Program Coordinator within 30 days.

TABLE OF EMP & ERP RESPONSIBILITIES					
	Accountable Officer	Program Coordinator	Production Engineer	Field Leadership	3 rd Party Provider
EMP Development & Maintenance	А	R	N/A	_	R
Hazard & Risk Analysis (H ₂ S, HVP, CEPA, Transportation, Other)	I	А	R	С	R
Emergency Response Plan Development & Maintenance	_	А	N/A	С	R
New Plan Approval	I	А	N/A	R	N/A
Regular Plan Review	I	А	С	R	С
Plan Distribution	I	А	N/A	С	R
Training & Exercise Program	I	А	N/A	С	R
Training & Exercises	I	А	N/A	С	R
Implement Improvements / Learnings		А	N/A	С	R

A = Accountable: Accountable to ensure it is completed R= Responsible: Responsible for completing

1.5 DOCUMENTATION & DOCUMENT CONTROL

The documents listed below support Whitecap's EMP. The first 3 documents are maintained by a 3rd Party Provider and are updated at least quarterly to ensure they are current. If updates are required, the documents updated and redistributed to Whitecap.

- 1. Whitecap ERP Organizational Chart maintained by 3rd Party Provider
- 2. Whitecap ERP Timelines maintained by 3rd Party Provider
- 3. Whitecap 3 Year ERP Plan maintained by 3rd Party Provider
- 4. Whitecap 5 Year Exercise & Training Schedule maintained by 3rd Party Provider and Whitecap
- 5. Whitecap Training & Exercise Program maintained by 3rd Party Provider and Whitecap
- 6. Whitecap Emergency Response Plans (ERPs) maintained by 3rd Party Provider



In line with regulatory requirements, Whitecap ERPs are reviewed on an annual basis by the appropriate Operations Superintendent to ensure that the information remains accurate. Changes to the ERPs could also be identified during training exercises or incidents or they could be submitted by Whitecap staff using the Revision Request form located within the ERPs. Updates to the ERPs could be triggered by some or all 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 ERP update. Significant updates may be distributed via an update package to all plan recipients or new ERPs may be deployed depending on the extent of the updates. These remaining documents are reviewed and updated at least annually:

- 7. Whitecap Health & Safety Management Program maintained by Whitecap
- 8. Whitecap Integrity Management Program maintained by Whitecap
- 9. Whitecap Environmental Management Program maintained by Whitecap
- 10. Whitecap Damage Prevention Program maintained by Whitecap
- 11. Internal Whitecap policies, processes & procedures maintained by Whitecap

1.6 RECORDS MANAGEMENT

1.6.1 Preparation

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

1.6.2 Emergency Response Equipment

Whitecap 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_2S and LEL) to ensure they are maintained in an effective operational condition. Whitecap keeps records of all inspections.

1.6.3 Response

Whitecap utilizes Emergency Response Plans to document incident details and response actions taken to respond. The Emergency Response Plans are available in hard copy and electronic format. Whitecap also utilizing the H2CommandCentre software program to communicate and document actions that taking as part of the response. Following the incident, the final report can be exported or printed for review during the debrief and for audit purposes.

1.6.4 Debrief

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

1.6.5 EMP & ERP Improvements

The Whitecap EMP and all the Whitecap ERPs contain a revision history that documents all the updates / revisions / improvements made.



1.7 PROGRAM EVALUATION AND CONTINUAL IMPROVEMENT

1.7.1 Program Review

Whitecap will complete an annual review of the EMP to ensure its suitability, adequacy, and effectiveness.

The review confirms whether:

- The EMP is fully implemented
- The EMP meets Whitecap's policy and objectives
- The EMP is adequate for its intended purpose
- 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
- The state of preparedness for emergencies (e.g., emergency response 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 for surrounding communities)

Data sources to review should include:

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

1.7.2 External Audit

Whitecap shall engage a 3rd Party Provider to complete a formal audit on the EMP every three (3) years.

1.7.3 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. All changes will be approved by the Program Coordinator to ensure they make sense for the program. The Program Coordinator will consult with the Accountability Officer as required in making these decisions. Updates to the EMP will be completed by 3rd Party Provider 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 Whitecap 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

Whitecap 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. Whitecap'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 Zones (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 & Hazards Zones
- 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 Whitecap'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 pose risks to Whitecap's pipelines, facilities & containers. Preventative measures are identified below each risk.

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



- Vessel Coating
- Vessel Inspections
- o PSV Serviced Regularly
- o ESD (Emergency Shut Down) Testing
- Damage caused by construction or excavation often not related to pipeline activity
 - o Public education program: educating those that live & work in the area
 - o Ground disturbance program and training
- Human error
 - o Equipment & lines are clearly identified
 - Detailed operating procedures
 - o Education & training
 - o Competency checks
 - o Clean work areas
 - Supervisors present
 - o ABSA (Alberta Boilers Safety Association) Compliance
 - SWA (Stop Work Authority)
 - o Car Seal Program
- Deliberate acts by terrorists, countries at war, vandals, or illegal dumpers
 - o Fences & barriers (concrete, pole, guards, etc.)
 - Tank farms
 - o Retention basin (good size, watertight, capacity, etc.)
 - Restricted areas
 - o Security systems
 - o Security cameras
 - o Personnel on-site 24 hours / day
 - o Signage
 - Use of piles
 - o 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_2S) concentrations of 0.1 moles per kilomole or greater (mol/kmol) (0.0001 mole fraction or 100 ppm). The EPZs are calculated using the ERCBH2S models.

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 all assets utilizing ALOHA to determine an EPZ. For sour assets, the largest of the EPZs calculated will be applied to that asset in the ERP.

2.2.3 Saskatchewan

EPZ calculations are completed for any sour well, pipeline or facility. The EPZs are calculated using the nomograph method and the ERCBH₂S models.



2.2.4 HVP Pipelines

Whitecap 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

2.2.5 Sweet CER Pipeline EPZs

Hazard planning zones for sweet CER pipelines are calculated utilizing ALOHA to determine an EPZ.

2.2.6 Facility EPZs

In Alberta and Saskatchewan, 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 or an Environment Canada regulated tank / bullet, the EPZ for that asset may determine the size of the EPZ for the sour production facility.

In BC, all storage tanks are factored into the EPZ for the facility. Storage tanks are calculated utilizing the ALOHA modelling system.

2.2.7 Environment Canada Regulated Facilities

Whitecap utilizes the RMP Comp or ALOHA modelling systems to calculate hazard zones for the regulated tanks / bullets at each facility. If alternate worst case hazard zones are also being calculated, then the same program (either RMP Comp or ALOHA) will be utilized.



3 PREPAREDNESS

3.1 EMERGENCY RESPONSE PLAN (ERP)

Whitecap has developed the following ERPs:

- Northern Alberta & Northeast British Columbia ERP (AER, CER, BCOGC, & Environment Canada)
- West Central AB ERP (Environment Canada)
- Southwest Alberta ERP (AER)
- Olds ERP (AER, Environment Canada)
- West Central Saskatchewan ERP (ER, Environment Canada)
- Southwest Saskatchewan ERP (ER, Environment Canada)
- Southeast Saskatchewan ERP (ER)
- South Central Saskatchewan ERP (ER)
- Weyburn EOR ERP (ER, Environment Canada)

3.1.1 Equipment

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

3.1.2 Hazard Monitoring

Whitecap maintains adequate monitoring equipment. Information on site specific monitoring equipment and its location is available within the ERPs. Early in an incident Whitecap would contact mobile air monitoring companies to come to the site that can take readings in parts per billion. Whitecap would also stay tuned into local weather and news to remain abreast of any other potential hazards (wildfire, flooding, and other natural disasters).

3.1.3 Mutual Aid

Whitecap assesses the need for mutual aid on a case by case basis and, where considered necessary, ensures that agreements are established. Any information regarding mutual aid agreements can be found within the Whitecap ERPs.

3.2 STAKEHOLDERS WITHIN AN EPZ

3.2.1 Consultation with Surface Developments

Whitecap consults with surface developments (residences, businesses, public facilities, etc.) located within its EPZs, located within 25m of its EPZs or located on a road where they would have to egress through its EPZs. 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 new surface developments. The Public Awareness Pamphlet and consultation meets all applicable regulatory requirements.

3.2.2 Notification of Area Users & Rights Holders

Whitecap 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

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

Whitecap provide a copy of the Public Awareness pamphlet to all landowners on an annual basis to make sure they are aware of the associated hazards in the area.

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. Whitecap provides each agency with an informational pamphlet and consults with these external agencies annually to determine their roles & responsibilities for inclusion in the ERP, 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 centers and what level of involvement they would have in coordinating evacuation within their boundaries. Whitecap provides a copy of their ERPs in electronic 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

Regulatory bodies require that the local authorities (R.D., City, Town Village, First Nations Reserve), be provided with specific information about the operations. Whitecap 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 ERP. Whitecap provides a copy of their ERPs in electronic or hard copy format to the required government agencies. External agencies are invited to attend Full Mobilization exercises as required.

3.3.3 Canadian Energy Regulator (CER)

The CER 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 ERPs. Whitecap completes government consultation as outlined above in Alberta & British Columbia and consults with the RCMP, local fire department and local ambulance. Whitecap provides a copy of their ERPs in electronic or hard copy format to the required government agencies.

The CER requires a continuing education program for the 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. Whitecap consults with the government agencies and first responders as indicated above and 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 requires Whitecap to include local, provincial, and federal response authorities in the development and preparation of plans and share the content of the plan with these organizations. For its Environment Canada regulated facilities, Whitecap 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. Whitecap also provides them with a copy of the completed Environmental Emergency Plan that contains emergency response information and information regarding the regulated substance / tank.

3.4 TRAINING & EXERCISES

3.4.1 Training Program

Whitecap has identified the 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. Whitecap personnel are trained through exercises, the operator competency program, and the completion of ICS-100. Leadership in the office and field will receive ICS-200 training. Furthermore, Whitecap personnel will be training up on the H2CommandCentre Response System. The level of training for this program will be determined based on your position within the organizational structure.

3.4.2 Training & Exercise Schedule

Whitecap maintains a training schedule that spans the next five years and identifies the regulatory required exercises as well as the competency based training that is required to ensure that Whitecap staff are qualified to fill their emergency response roles (see attached 5 Year Exercise Schedule).

3.4.3 Alberta

The AER requires an annual tabletop 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 tabletop 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 tabletop exercise to be conducted for each hazard category identified at each registered facility. Additionally, Environment Canada requires each licensee to complete a full-scale exercise every five years for each hazard category identified at each registered facility. The exercise must involve the registered tank / substance. Whitecap invites local response authorities to observe at the exercises where feasible.





3.4.6 Canadian Energy Regulator (CER)

- At least one simulated exercise is held annually (e.g., tabletop, functional) and a full-scale exercise (involving all agencies identified in the company's liaison) is held at least every three years.
- The exercises are varied to confirm that all aspects of potential emergencies are tested; and
- They 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)

Whitecap utilizes the Incident Command System (ICS) for its field responders. ICS is a standardized approach to the command, control, and coordination of emergency response providing a common hierarchy within which responders from multiple agencies can be effective.

Emergency Support Team (EST)

Whitecap utilizes a customized Emergency Support Team (EST) structure for its corporate responders. The field responders focus on control / contain the incident, public safety, etc. whilst the corporate responders focus on supporting the field team, evaluating, and managing long term impacts and threats to company, business continuity. The EST is structured so that corporate responders support the incident by doing their day-to-day jobs that they already know well (i.e. Human Resources) as opposed to trying to learn / fit into ICS roles; they can immediately provide value to a response. Unlike the field responders which rigidly follow the ICS structure, the EST is customized to align with the functional units already existing within Whitecap's organization. The EST plan intentionally does not duplicate the ICS roles for corporate responders to reduce confusion between the field and corporate response (i.e. having two logistics people, two operations people, etc.). Although the ICS position names are not utilized, the EST plan still adheres strongly to the Principles of ICS (Chain of Command, Unity of Command, Span of Control, etc.) to ensure a functional response.

Command and Coordination Centers

Whitecap identifies primary and alternate Incident Command Post locations within the site-specific section of its ERPs. These are the key sites to where a response will be setup in the field.

Whitecap also utilizes the H2CommandCentre central platform for emergency management. This tool helps Whitecap prepare for and manage emergency situations. More details on H2CommandCentre



4.2 INTERNAL COMMUNICATIONS

Whitecap's ERPs contain 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 role description identifies a communication 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 Information Officer role who is responsible for preparing the regular status updates that will be provided to internal company personnel to keep them apprised of the situation.

Whitecap utilizes H2CommandCentre to mass notify individuals internally to gather as many resources as possible to effectively respond to the emergency. The communication processes, procedures, systems, and equipment are tested during training exercises.

4.3 EXTERNAL COMMUNICATIONS

Whitecap's ERPs 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 Whitecap 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.
- Information on how H2CommandCentre's systems work

4.4 MEDIA

Whitecap's ERPs 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 Information Officer role who is responsible for developing and releasing information about the incident to the news media. Whitecap has a media communications expert on retainer to assist in an emergency.



4.5 COMMUNICATION WITH STAKEHOLDERS

Whitecap 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 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:

- Mass notification through H2CommandCentre to send out an initial shelter in place or evacuation message
- Personal phone call utilizing contact lists contained within the ERPs
- Door to door notification where the number of surface developments is low and where notifying personnel this way won't put anyone at risk.
- Via Rovers or Roadblock personnel who would be attempting to locate transients and isolating the hazard area
- Via emergency notification from the local authority

4.6 RESPONSE PRIORITIES

Whitecap utilizes and basis their emergency response the following response priorities:

- Life Safety of responders and others.
- Incident Stabilization the act of establishing command, setting objectives, strategies, and tactics as well as initiating actions.
- Property / Environment Protection means ensuring the emergency doesn't cause more damage or extend to more property loss as well as protecting the environment form further degradation due to the incident.

4.7 COMMAND & COORDINATION CENTRE ACTIVATION

The Whitecap ERPs contain procedures for activating and setting up its command posts as well as communication protocols between the various Whitecap and external agency command posts.

4.8 INCIDENT ACTION PLAN

The Whitecap ERPs contain forms and procedures to assist with develop an Incident Action Plan (IAP) that is specific to the emergency.



4.9 SAFETY

The Whitecap site specific ERPs contain roles for:

- Site Safety 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.

The Whitecap EST contains a role for:

• Health & Safety who ensures that health / safety of responders, employees and the public is the highest priority throughout the response.

Whitecap has policies and procedures in place for COVID-19. Below are some additional details as to how these policies will be implemented during a response:

- Signs will be posted at each key response facility reminding responders of COVID-19 protocols.
- All responders are to follow the guidelines set up by Whitecap's HSE department
- All responders during safety meetings will be briefed on the COVID-19 protocols to make sure
 everyone understands the importance and is adhering to the safety measures
- All responders will have appropriate PPE in place prior to responding to an emergency.
- Any individual who has COVID-19 or is showing symptoms will be removed from the Incident Management and / or Emergency Support Teams

4.10 PUBLIC SAFETY

Whitecap completes a government consultation with the local authorities and health services. During these consultations, the parties discuss the responsibilities prior to, during, and after an emergency that impact public / life safety. This ensure that all public safety actions will be coordinated with the local authorities during an incident.

4.11 DEACTIVATION & DEBRIEFING OF THE RESPONSE

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