ENVIRONMENT **Section 15.0**

Revised November 1, 2022 **Policy**

Canadian Plains Energy Services (CPES) is committed to managing environmental impact as an integral part of our operations. We are dedicated to assuring the environmental integrity of our processes, service offerings and facilities. It is our intention to reduce the impact on the environment by minimizing and preventing adverse environmental effects, through waste management systems, emission reduction, spill prevention, and supporting ecofriendly alternatives.

WE ARE COMMITTED TO:

- Comply with applicable environmental legislation and other regulatory requirements
- Assess the environmental impact of our operations (past, present, future)
- Continually seek to improve environmental performance by conducting periodic environmental performance self-evaluations.
- Reduce pollution, emissions and waste, e.g. emissions from transport, oil leaks and spills, or excessive noise generated by the activities of our operations
- Reduce the use of all raw materials, energy and supplies
- Train our employees in environmental protection practices
- Consider environmental performance and protection when hiring suppliers and contractors
- Assist and work with our clients to use products and services in an environmentally sensitive way
- Liaise with the local community
- Communicate environmental aims and objectives to employees and external stakeholders

RESPONSIBILITIES

Senior Management Responsibilities
- Approve and implement this policy
- Ensure all operations and workforce adhere all practices and protective measures
- Provide all resources required to execute our operations in an environmentally friendly manner

Line Management Responsibilities
It is the responsibility of the Manager to:
- Follow, adhere, and participate accordingly to the Policy.
- Understand and implement this Policy and practices and protective measures
- Be aware of the applicable environmental legislation and other regulatory requirements.
- Provide all resources required to execute our operations in an environmentally friendly manner
- Ensure supervisors and workers comply with this policy and adhere to all practices and protective measure.

Supervisor's Responsibilities
It is the responsibility of the Supervisor to:
- Know what is required as per provincial regulations.
- Ensure that workers are competent in the use of environmental protection equipment and practices
- Ensure workers comply with this policy

Worker's Responsibilities
It is the Responsibility of each worker to:
- Comply with this policy

Subcontractor and Visitor Responsibilities
It is the responsibility of each subcontractor & third-party vendor to:
- Comply with this policy and adhere to all practices and protective measures.

APPROVED:
Aaron Karpan, President

Canadian Plains Energy Services (CPES) is committed to managing the waste products generated across all our operations and exploring alternative solutions to divert waste while in accordance with all applicable regulations. CPES will make every practical attempt to ensure that wastes are managed in such a way as to protect the health of the environment against the adverse effects which may result from the mismanagement of such wastes. CPES is also dedicated to pollution prevention of all waste streams (air, liquid, and solid emissions including hazardous waste through, good operating practices, exploring product alternatives, and proper management of waste.

Responsibilities

CPES will hold Management, employees, and sub-contractors accountable to their responsibilities of managing waste products generated across all operations and projects. Our good operating practices include reducing the volume of wastes generated, reusing as many products as possible, recycling the products that are recyclable and disposing what we cannot reuse or recycle in an appropriate manner.

CPES will include environmental protection and waste management in its work life cycle.

CPES will integrate waste management protocols within its Hazard Identification, Assessment and Control (HIAC) process.

CPES will coordinate with the project site and all stakeholders to ensure good operating practices are followed for proper disposal of wastes, scrap materials, contaminated materials, etc. This includes manifesting, transportation, and final disposal, to the appropriate facilities.

CPES will assign person(s) accountable for disposition of wastes generated at the work site, in accordance regulations or site requirements.

CPES will ensure that project related wastes are stored and maintained in an organized fashion to encourage proper disposal, minimize risks to employees and reduce our impact on the environment. This would include the proper signage, storage containers and waste receptacles.

CPES will ensure that all employees/contractors are WHMIS trained.

CPES will ensure that where applicable, employees are trained in the transportation of dangerous goods (TDG).

Practices

<u>Reduce</u>

- Reduce the amount of non-recycled waste products generated
- Reduce the amount of emissions generated through our fleet, where possible
- Streamline product purchasing and minimize the use of packaging, where possible
- Reduce wastewater, where possible

<u>Reuse</u>

- Purchase and use reusable and refillable containers where possible
- Reuse all materials wherever possible

Recycle

- Collect and recycle used oil and filters
- Collect and recycle all used/scrap metal
- Collect and recycle all used/scrap wood
- Collect and recycle all used paper products
- Collect and recycle all glass and plastic products

Canadian Plains Energy Services (CPES) is committed to preventing and managing any spills of materials that could potentially contaminate the environment.

Any spill or release of hazardous material that meets the regulatory reporting requirements must be immediately reported to the Provincial and/or Federal Environment Department by the appropriate party (usually the site owner). Immediate reporting allows the Provincial and/or Federal Environment Department, and local first response teams, to respond quickly, manage and prevent further damage to the environment through timely containment and effective clean up practices.

Responsibilities

Management, employees, and sub-contractors have a shared responsibility in preventing and managing any spills that could potentially impact the environment, people, and the public. Spill prevention strategies and emergency spill clean-up plans for all facilities and job sites where potentially harmful materials are present must be developed at the planning stage.

Best practices for managing and preventing spills must be employed across the job site, such as secondary containment for fuels, solvents, and equipment.

Adequate spill kits and other means of containment will be provided and regularly inspected to meet regulatory and customer requirements.

Employees must be trained and instructed on the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal, and communication procedures.

Immediately report all spills and releases to your supervisor or site representative, no matter how minor to ensure a timely and effective response.

Chemicals and hazardous materials will be stored as prescribed in the material's Safety Data Sheet (SDS). Consideration should be given to the use of closed containers, secondary containment, and restriction of access to water ways and storm drains.

<u>Emergency Spill Clean-up Plans and Reporting</u>

- The plan should contain a site-specific plan showing the location of storage areas for chemicals, storm drains (and the direction of slopes towards drains) and the description of any devices to stop spills from leaving the site.
- The plan should describe the notification procedures to be used in the event of a spill, such as key company personnel and the Provincial and/or Federal Environmental Emergency Contacts. Contact number for Alberta is 1-800-222-6514, for British Columbia is 1-800-663-3456, for Saskatchewan is 1-800-667-7525, for Manitoba is 1-204-944-4888.
- The plan should give explicit instructions regarding clean-up procedures and include SDS sheets.
- A summary of the plan should be posted at appropriate points on the worksite and identifies the location of spill kits and phone numbers of regulatory agencies to be contacted.

<u>Spill Procedures</u>

- Protect yourself and your co-workers first.
- Secure the spill area.
- Contain spills with absorbent pads, socks, or berms as necessary.
- Contact your supervisor immediately.
- Collect contaminated soil and used absorbents and store in a well-ventilated secure location in a labeled container.

- Dispose of contaminated soil or other material at appropriate facilities only.

References

- CPES Form S-12 Alberta, Reporting Spills and Releases (2 Pages)
- CPES Form S-14 Saskatchewan, Reporting Spills and Releases (3 Pages)
- CPES Form S-15 British Columbia, Hazardous Material and Oil Spills (3 Pages)
- Alberta Environmental Protection and Enhancement Act
- Alberta Release Reporting Regulation
- Federal Transportation of Dangerous Goods Regulation
- Federal Dangerous Goods and Handling Act
- Alberta Oil and Gas Conservation Act
- British Columbia Environmental Management Act
- British Columbia Spill Reporting Regulation
- Saskatchewan Hazardous Spill Reporting Guideline
- Saskatchewan Environmental Spill Control Regulation
- Manitoba Environmental Accident Reporting Regulation

Canadian Plains Energy Services (CPES) is committed to minimizing erosion and sedimentation that may occur through the execution of the following scopes of work; use of heavy equipment, as well as excavating, trenching, boring, stockpiling, backfilling, etc. These activities can impact the environment on and off the worksite including watercourses, water bodies and aquatic life. All stages of job planning, and execution must include good operating practices designed to manage the prevention of soil erosion and sedimentation.

Erosion is defined as the physical removal of soil particles from a given location, usually by water or wind.

Sedimentation is the subsequent transport and deposition of these particles. The natural factors that influence the type and severity of erosion included vegetative cover, topography, soil composition/structure, and precipitation. Humans affect erosion through hydrovac'ing, excavating, and the like. Erosion prevention is the preferred method for eliminating or reducing the potential for sedimentation.

Responsibilities

CPES will hold Management, employees, and sub-contractors accountable to their responsibilities of managing erosion and sedimentation created on project sites. Our good operating practices include ensure that we have a through execution plan with safeguards in place to mitigate our impact.

CPES will include environmental protection practices in its work life cycle.

CPES will coordinate with the project site and all stakeholders to ensure good operating practices are followed to minimize our impact during the execution of our work.

Prevention Strategies

Strategies to prevent/reduce erosion on job sites should follow a hierarchical approach, and include:

- Job planning must be conducted pre-job, during construction, and after construction to identify potential impacts and necessary control measures.
- Implement plan to limit and minimize the duration of soil exposure
- Limiting the size of disturbed areas by minimizing nonessential clearing
- Minimizing slope length and gradient of disturbed areas
- Limiting the size and height of stockpiled soil, especially where wind is a factor, and near steep slopes and watercourses
- Using site perimeter controls, settling controls, and filtration controls to control runoff at both entry and exit points to/from the jobsite.
- Retaining existing vegetation wherever possible
- Utilize erosion control devices to prevent erosion and sedimentation.
- Use of sediment control devices at entry and exit points for any water runoff to prevent sediment from entering any waterways.

Routine monitoring, inspecting, and maintenance are to be conducted on erosion and sediment control equipment. This process shall be performed by workers who have received appropriate training in the design, installation, and maintenance of the implemented devices.

Canadian Plains Energy Service's is committed to management and handling of wastewater on its worksites. The waste streams generated on our worksites is limited however most communally generated through subcontracted hydrovac'ing services and surface runoff that has collected or been directed to a natural or man-made holding feature.

All stages of job planning, and execution must include good operating practices designed to manage the prevention of soil erosion and sedimentation.

Responsibilities

Management, employees, or subcontractors engaged in the handling, storage, analysis, testing, transport, or disposal of wastewater generated on Canadian Plains Energy Services worksites shall be trained and competent before beginning work.

Subcontractors will be held accountable for the disposal or containment of wastewater that is recovered by the vacuum truck during the daylighting process.

If wastewater is to be transported to a treatment or disposal facility, it shall be done using a prequalified contractor, and subject to all processes and standards included under the Transportation of Dangerous Goods (TDG) Regulations.

If wastewater or runoff is to be retained or stored on a Canadian Plains Energy Services worksite, it must be guarded against accidental access by people or wildlife, using fencing and signage.

If any wastewater is to be discharged to the environment, it must be assessed beforehand to determine if it is hazardous or non-hazardous. Typically, this is done by sampling and laboratory analysis, for suspended solids, contaminants, chemicals, etc.

In the case of a client-owned site, any release or discharge of wastewater must be coordinated with that client's representative prior to discharge. This coordination shall include documented evidence, results of testing and adhere to all regulatory requirements.