

Emergency Management Program Information

Introduction

To meet our commitment to the protection of people, the environment and property, Harvest Operations Corp. (Harvest) maintains an Emergency Management Program. This program provides a framework from which we ensure elements of emergency management are in place allowing us to prepare for emergencies that may arise from hazards posed by our operations and be prepared to effectively respond to those emergency situations.

Continual improvement to the Emergency Management Program allows us to address changes within our operations and business and meet our commitments to safe business practices. Harvest has developed and maintains an Emergency Procedures Manual, also known as an Emergency Response Plan (ERP) which is part of the overall Emergency Management Program. While developing and regularly updating the ERP, all hazards are identified and mitigation measures are put in place to eliminate or reduce the hazard where appropriate. The ERP identifies an Incident Management System and response measures which provides guidance on how to respond to the potential effects of an emergency caused by the hazards. Regular review of the ERP by way of training and exercises ensure our personnel are familiar with the hazards and possess the required competence to carry out response roles in an emergency.

Harvest complies with all federal, provincial and local regulations in the development and maintenance of the Emergency Management Program and Emergency Response Plan(s).

Regulating agencies for Harvest include:

- Alberta Energy Regulator (AER)
- BC Energy Regulator (BCER)
- Canada Energy Regulator (CER)
- Environment Canada (Environmental Emergency (E2) Regulations)

Key Public Safety Information

In the event of an emergency incident, Harvest will activate its Emergency Response Plan and assign participants to roles within the Incident Management Team. With these activations, appropriate first responders, regulators, agencies, municipalities and local authorities (including indigenous communities where appropriate) will be identified through the site specific information of the ERP and contacted with a notification of the incident or with a request for assistance to participate in the response. Members of the public previously identified within the affected Emergency Planning Zone (EPZ), will receive direct contact via telephone or visit and provided with appropriate public protection measures. If an incident requires public protection measures outside of the EPZ, public protection notifications will be coordinated with the local authority and contact may be in the form of visits, community news boards, social media, media and/or provincial emergency alerts systems. Contact information is reviewed and updated annually as part of Harvest's ERP consultation process.

Harvest prepares Public Information Packages that are provided during the annual consultation process. In addition to important contact information such as Harvest's 24 hour emergency number, the Local Authority's contact number and the regulating agency's contact number(s), the Public Information Package includes details such as the following:

- Harvest's operations and assets

Key Public Safety Information – Cont'd.

- Identified hazards from operations and potential health impacts from those hazards
- Public protection measures which may be taken during an emergency, including details about area isolation, sheltering-in-place, evacuation, reception centres (if applicable) and ignition
- What to do if you suspect a problem
- Map of the operating area

Notification to Harvest Operations Corp. about an emergency or a suspected emergency can be made by contacting Harvest's 24 Hour Emergency Number at 1-800-760-2826. A Harvest representative will be immediately assigned to investigate and respond as appropriate.

Emergency Procedures Manual / Emergency Response Plan

Harvest Operations Corp has developed and maintains Emergency Procedures Manual(s) (also referred to as Emergency Response Plan(s) (ERP)), which are guiding documents used for emergency response. The manuals are available for viewing on the Harvest website, <http://harvestoperations.com/ehs.html> and are presented as two separate documents, The Corporate Emergency Response Plan and a Site Specific Emergency Response Plan for the applicable area. The Corporate Emergency Response Plan provides details such as the Incident Management System used by Harvest Operations Corp; Identification procedures of emergency situations; Public protection measures taken for various emergency situations; Responder roles and responsibilities; Reporting requirements and communications for emergency's; and Response Forms used in the management of a response. The Site Specific Emergency Response Plan is meant to detail operating area specific hazards, contact information and mapping. Certain information within the publicly posted ERPs has been redacted for the protection of private and/or confidential information, or in instances where posting of information may pose a security threat to Harvest personnel or assets.

Emergency Management Program Summary

The Harvest Operations Corp Emergency Management Program as established under the Environmental, Health & Safety Policy is a framework which allows us to:

- Identify hazards which may impact our organization or hazards our operations may pose to the surrounding community or environment
- Plan for and prepare to respond to emergency situations that may arise from identified hazards
- Develop a system in which we can respond in an organized, effective and competent manner
- Continually improve processes, policies and competencies with respect to Emergency Management

Key elements of the Emergency Management Program which allow Harvest Operations Corp to meet our commitment to the protection of people, the environment and property are listed below.

Policy and Commitment

Harvest Operations Corp. operates under its Environmental, Health & Safety Policy which states its commitment from all levels of the organization to the Environmental Health & Safety Management System (EHSMS) that protects employees, contractors, subcontractors, visitors, the public, property and the environment. The Emergency Management Program is guided by the EHSMS to ensure the policy objectives are met. The policy and management system can be viewed on Harvest's web page at <https://harvestoperations.com/ehs.html>.

Goals and Objectives

Harvest Operations Corp.'s goals and objectives in emergency management are focused on the following categories, each supported with specific activities:

Prevention

Prevention of an emergency occurring is the ideal situation and overriding goal of Harvest. Ensuring we are compliant with regulations, following our corporate codes of practice, implementing engineering controls into our systems and adopting industry best practices are steps Harvest takes to prevent emergency situations. Some of Harvest's management systems that assist in this effort include, but are not limited to:

- Environmental Health & Safety Management System (EHSMS)
- Asset Integrity System
 - ❖ Pipeline Integrity Management Program
 - ❖ Pressure Equipment Integrity Management Program
 - ❖ Key Performance Indicators

Planning

Planning is the key component in ensuring Harvest's goals and objectives are met in the emergency management process. Planning is a continual process at Harvest with ongoing measures listed below (list is not exhaustive):

- Emergency Response Plans are reviewed on a regular basis (at least annually), to ensure risks have been identified and potential consequences planned for; accuracy of the plan is current; and the plan is complete to ensure the three primary objectives of Life Safety, Control and Containment and Environmental Protection are accounted for in a response.
- Continuous education is provided through our emergency management consultation process, which keeps stakeholders informed of ongoing hazards, procedures, contact information and roles & responsibilities. Education is provided to response personnel by way of training and exercise participation which is scheduled according to regulatory requirements and identified Harvest requirements. A system of capturing action items is maintained from training and exercises to ensure continuous improvements are being made and appropriate planning and education is being carried out for emergency management purposes.
- Through planning, emergency response equipment is identified, sourced and located in strategic locations along the operating system to ensure timely response based on the identified hazards.
- Incident Management System is in place, maintained and communicated to responders to ensure effective management of a response. An active Incident Management System also ensures required response roles are filled during an emergency. Ongoing training is conducted to maintain competency of responders in these roles.

Goals and Objectives – Cont'd.***Response***

In any emergency response scenario, Harvest Operations Corp. responds with three primary objectives which include Life Safety, Control & Containment and Environmental Protection.

Recovery

Return to normal operations is the goal in any response at Harvest. Full recovery from an incident will include incident investigations, remediation measures as required and communications and further training as required with Harvest personnel, industry and applicable agencies.

Hazard Identification, Risk Assessment and Controls and Clean-up and Remediation

Hazard identification, risk assessment and controls are the shared responsibility of all personnel and must be considered at several stages throughout the life cycle of all business activities and are essential in ensuring activities are conducted in a safe and responsible manner. Harvest has developed numerous techniques and tools for conducting hazard identification, risk assessment and control. Specific tools are to be utilized when applicable; however the basic process for identifying hazards, assessing risk and implementing controls must be completed in all situations for all work that is to be conducted at all Harvest worksites. A complete list of these policies can be found in Harvest's Environmental Health & Safety Management System. Hazards may include but are not limited to toxic chemical or gas releases to atmosphere; Petroleum product spills; Explosions, fire and heat radiation; Natural disasters caused by weather, wildfires, earthquakes etc.; Security threats or breaches; etc.

As part of the risk assessment, Harvest utilizes dispersion modeling software and/or provincially mandated nomograph calculations to determine the size of the Emergency Planning Zone(s) (EPZ) for identified risks. The EPZ's, which are mandated by regulatory requirements and factor in any mitigating measures taken, provide an area in which stakeholders can be identified and site specific emergency management planning can be conducted factoring in the impact of the risk(s) and consequences to the identified stakeholders and area. Once the size of the EPZ has been determined, GIS mapping software is used to identify geographic features and potential stakeholders that may be impacted by exposed risk(s) in an emergency situation. Ground truthing (the activity of physically traveling the area) to identify locations such as residences and business within the EPZ is also conducted to determine the occupants of the area who may be at risk and require consultation to communicate the possible hazards and public protection measures used in an emergency to ensure their safety.

Emergency Response Plan(s) are developed and maintained to address the identified risks and provide guidance on how to communicate with impacted stakeholders and the public protection measures identified to reduce or eliminate the consequences of an emergency incident.

Hazard Identification, Risk Assessment and Controls and Clean-up and Remediation – Cont’d.

Control systems (dictated by the operational risks eg. Spills, release to atmosphere, etc.) such as valving, leak detection, environmental monitoring, available response and clean-up equipment, safety processes and policies, and specific incident response training are in place within the gathering system to reduce the likelihood of an emergency occurring or providing the ability for early detection. These systems allow for an effective response as required in an emergency situation. After immediate response to an emergency situation, the incident command system and emergency response plan will be activated to establish specific response, recovery and remediation goals, objectives and strategies based on the actual emergency parameters. Response assistance from third parties or municipal authorities will be sourced as required based on the incident type and specific assistance required.

Stakeholder Liaison to Prepare for Emergencies

On an annual basis, as part of the Emergency Response Plan review, Harvest Operations Corp. contacts and consults with key area stakeholders. This contact is meant to complete Harvest’s “Government Engagement Report for Emergency Management” which allows the company to collect or verify current contact information; identify area development; identify stakeholder processes; and establish roles and responsibilities with Mutual Aid partners, Health Authorities and Local Authorities (includes first responders). Annual consultations are conducted by either face-to-face visit at the stakeholder’s place of business, by telephone or electronically via e-mail. The information obtained in the consultation process is used in the development, update and maintenance of the emergency response plan(s) which allows Harvest to:

- Identify and contact appropriate personnel in the event of an emergency to provide response details.
- Identify potential roles and responsibilities of the Mutual Aid partners and/or Local Authorities
- Establish how each party may participate in the response through the Incident Command System organizational structure and how Unified Command would be carried out, if required.

Continuing Education

Harvest maintains communication on an annual basis (or earlier as a result of changing operations), with Surface Developments (residents and businesses within the calculated emergency planning zone(s)), Local Authorities (including first responders), Health Authorities and applicable government regulators. Information is shared to these stakeholders through Harvest’s annual information package which highlights emergency preparedness materials for the area, such as:

- 24 hour emergency contact numbers
- Operational overview of the area
- Levels of emergencies
- Hazards and potential emergency situations associated with Harvest’s operations in the area and impacts to human health
- Public protection measures and how Harvest would implement those measures
- Things to do if one suspects an emergency situation

Continuing Education – Cont'd.

The Harvest Operations Corp's Environmental Health & Safety Management System (EHSMS) has a focus towards continuing education and outlines the requirements for all persons who enter a Harvest site and mandate they receive a Site Specific Orientation & Hazard Assessment. The Site Specific Orientation & Hazard Assessment is intended to communicate site hazards, rules and protocols for the operation. Orientations are conducted as part of regular operations and as part of any emergency response activities.

Key stakeholders who may assist in the response to an emergency incident also receive continuing education by being invited to participate or observe in emergency response exercises and are provided with a copy of the applicable Harvest emergency response plans.

Training and Exercises

Harvest Operations Corp. ensures a state of readiness by scheduling and conducting emergency response training and exercises on a regular basis which are held at a minimum of once per year for those identified for potential roles within the emergency response organization. Mandatory participation is required for identified personnel (both employees and contract) from all levels of the organization including field and corporate based. Exercise scenarios are determined based on the hazards identified for the operational area, and which allow the participants to utilize tools such as the emergency response plan(s). Harvest has established an exercise cycle which includes both discussion based table top or functional exercises and full scale (deployment) exercises.

Exercises provide an opportunity for Harvest and stakeholders such as the Local Authority, Health Authorities, Policing Agencies, Regulatory Agencies and others as dictated by the operation or area, to work together to ensure a coordinated response in the event of an actual emergency. Opportunity is also provided for each organization to understand each other's roles and responsibilities and how they will work together to effectively respond. These stakeholder organizations are invited to participate in all Harvest Full Scale exercises.

Emergency management training is based on the elements that make up the Harvest Emergency Response Plan. These elements would include, but may not be limited to:

- Identification of emergency levels
- The Incident Command System (ICS)
- Public Protection Measure and Responder Safety
- Harvest Emergency Response Organization
- Response Team Duties
- Incident Specific Response Actions
- Reporting Requirements and Communications
- Response Forms
- Equipment

Incident Management System

Harvest Operations Corp. utilizes the Incident Command System (ICS) as its incident management system to manage all company emergencies. This system is effective in any situation, both large and small as it provides for the flexibility to expand or contract the response organization as required to respond to an incident. The standardized ICS system is a combination of facilities, equipment, personnel, procedures and communications operating within a common organizational structure. As ICS is also utilized by potential response partners such as Local Authorities, First Responders, Regulatory Agencies and other Government Agencies, each organization is able to quickly understand the response structure, communicate within it and occupy roles within the response, as required.

Harvest has the capacity to fill all positions within the Incident Command organizational structure with trained personnel and will manage the initial and on-going response to the emergency. In situations where outside assistance is required, outside personnel will be incorporated into the ICS structure and follow the established chain of command for the incident, with ultimate responsibility for the response resting with a Harvest Operations Incident Commander. Unified Command may be adopted in situations where authority for the response is retained by multiple organizations/agencies or as dictated by applicable legislation.

Coordination of a response will be conducted from the Incident Command Post, which may be located at a Harvest field office which has been equipped to support emergency response activities. The location of the Incident Command Post will be determined based on safety of responders and proximity to the incident site. The Incident Command Post may be repositioned if safety becomes a concern or a more appropriate location is required to accommodate Unified Command. Harvest will also establish a Corporate Emergency Coordination Centre, as required, to support the Incident Commander and the field based Incident Management Team.