



**STEELREEF**  
INFRASTRUCTURE CORP.

# SITE SPECIFIC CONSTRUCTION SAFETY PLAN

Sinclair Pipeline Project



August 8, 2022

Rev 0

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## Site Specific Safety Plan (SSSP) Overview

The subject SSSP outlines how occupational, health and safety aspects of the project will be managed during the construction lifecycle. The SSSP explains how safety concerns will be identified and addressed; it also describes the responsibilities of project stakeholders with respect to health and safety.

The SSSP provides an overall framework incorporating legal and project-specific safety requirements in order to ensure a safe worksite through the duration of the (construction) project. The SSSP reflects the implementation of the Steel Reef Infrastructure Corporation (Steel Reef) Management System and Safety Management Program. It is applicable to both employees and contractors.

In accordance with provincial and federal occupational health and safety legislation, a company is to have a Safety Management Program in place that anticipates, prevents, manages, and mitigates any conditions that may affect safety during all company activities.

The Canadian Energy Regulator also requires regulated companies to develop a Construction Safety Manual to provide for safety during all company activities throughout the project lifecycle. The SSSP is Steel Reef's Construction Safety Manual – which has been combined with project specific information to reflect the site-specific conditions and information for which the SSSP has been developed.

## Project Scope

*Slightly sour natural gas will be transported from the Steel Reef compressor station (located at 16-32-007-29 W1M (16-32) in SW Manitoba through a new 6" steel pipeline to an existing third-party (Nottingham Midstream) facility located at 16-10-006-30 W1M (16-10) in SE Saskatchewan and then to Steel Reef's Nottingham Gas Plant (08-17) located at 08-17-005-32 W1M through an existing 6" pipeline system.*

*Currently the slightly sour gas is being flared from several [REDACTED] field locations in Manitoba and this project will enable the gas to be transported to 08-17 Nottingham Gas Plant to be processed to produce a saleable commodity. This will also eliminate the need to burn the slightly sour gas, thereby reducing Green House Gas (GHG) emissions.*

*This project falls under the jurisdiction of the Canada Energy Regulator (CER) and encompasses an approximately 20km NPS 6 pipeline crossing the Manitoba and Saskatchewan border and the associated surface facilities.*

*The system is designed for a flow rate of 140 Std e3m3/d with up to 2.0% H2S (matching the inlet pipelines), a max operating pressure (MOP) of 2,750 kPa and a design pressure of 4,940 kPa.*

The scope of this project includes:

- One (1) new Steel Reef 16-32 compressor station (greenfield) including but not limited to:
  - Lease development: new access road, fencing, grading, graveling, etc.
  - Inlet riser area: new emergency shutdown valve (ESDV) installed downstream of the NPS 4 and 10 pig receivers (receivers by others), new slug breaker valve upstream of the new inlet separator.
  - One (1) new horizontal 2 phase sour specification separator.
  - One (1) existing Arial JGK-4 electric reciprocating sour specification 1200 hp compressor (relocated from [REDACTED]).

- Two (2) new electric liquid pump trains (booster and injection) included in the inlet separator building.
  - Metering: gas metering via existing v-cone meter on the compressor discharge and liquid metering via new Coriolis meter located in the inlet separator building.
  - Discharge riser area: new NPS 6 riser and pig launcher with ESDV.
  - One (1) new high pressure flare stack.
  - One (1) 1000-gallon propane storage bullet for flare pilot.
  - One (1) new high pressure flare knock-out drum.
  - One (1) new instrument air and nitrogen generator skid
  - One (1) chemical injection package (methanol and corrosion inhibitor).
  - One (1) electrical building (MCC) including switchgear, VFDs, and PLC
  - One (1) existing 4160 VAC switchgear building (relocated from [REDACTED])
  - Manitoba Hydro utility connection and transformer.
- 16-10 facility modifications (brownfield):
    - One (1) new NPS 6 pig receiver with two (2) ESDV (for over-pressure protection). ESDVs also equipped with low-pressure set-points to reduce the impact of a pipeline leak.
    - Pipeline tie-in to third-party pipeline system.
    - Utility tie-ins: flaring, purge gas, instrument air, electrical power, control system integration communications.
  - New 20.74km NPS 6 pipeline from the 16-32 compressor station (Manitoba) to the 16-10 facility (Saskatchewan).

## Safety Policy and Prime Contractor Duties

Steel Reef is designated as the Prime Contractor for this project. The Prime Contractor is responsible for the overall safety and security associated with all employees, contractors and sub-contractors working on site.

Steel Reef has designated the Site Construction Supervisor/Inspector listed below to act as the Prime Contractor representative on their behalf, to implement the Steel Reef Health and Safety Plan, and to uphold a high standard of safety.

Contact information of the Prime Contractor representative for this project:

Name	[REDACTED]
Company	Steel Reef Pipeline Canada Corp.
Phone Number	[REDACTED]
E-mail address	[REDACTED]

A Prime Contractor is required under the following criteria:

Province	Criteria
Alberta	A prime contractor is required when there are two or more employers or self-employed persons (or a combination of these) involved in work.

Province	Criteria
Saskatchewan	A prime contractor is required when there are 10 or more workers or self-employed persons under the direction of two or more employers.
Manitoba	A prime contractor is required on any construction project that involves more than one employer or self-employed person.

The Prime Contractor representative's duties include, but are not limited to:

- identifying and informing employers and self-employed persons about hazards for which the prime contractor is responsible;
- setting up an effective system to ensure that everyone involved in work at the project meets their legal safety and health obligations;
- coordinating the safety and health programs of contracted employers;
- ensuring, insofar as reasonably practicable, that the employers or self-employed persons at a worksite eliminate hazards identified by the prime contractor before activities or operations begin on the worksite and after they have commenced;
- ensuring that the employers of self-employed persons at a worksite reduce or control hazards that cannot be reasonably eliminated;
- ensuring that the contact information of the prime contractor is posted in a conspicuous location at the worksite;
- ensuring that all activities at the worksite that may affect health and safety are coordinated;
- ensuring, as far as reasonably practicable, that all employers and self-employed persons have adequate and appropriate occupational health and safety policies and procedures, safe work practices and equipment, and competent and informed workers;
- identifying a competent person to oversee and direct, on behalf of the prime contractor, the activities of employers and self-employed persons at the worksite; and
- preparing a written plan that explains how the requirements are to be met and delivering a copy of the written plan to all employers and self-employed persons before any work commences.

**A copy of this SSSP shall be made available to all personnel working on site.**

*The Steel Reef Project Team is committed to the principle that "all occupational injuries and illnesses are preventable". We believe that everyone's health and safety is an essential part of the project; we are responsible and accountable to effectively implement the "Site Specific Safety Plan" (SSSP) - which will aid in incident prevention.*

## Site Traffic Plan

- The work area includes pipeline right-of-ways, temporary workspaces, flagged areas on 3<sup>rd</sup> party leases, and laydown yards. Only required work vehicles and equipment are authorized to be in the work area.
- Access includes public roads, 3<sup>rd</sup> party joint-use roads, temporary access roads, and designated travel outside of pipeline right-of-ways. Only marked approaches should be used for entry/exit onto pipeline right-of-way or 3<sup>rd</sup> party lease.

- No equipment or workers are allowed off posted work areas. Trespassing on to adjoining lands will not be tolerated.
- Ensure Operations Contact (refer to *Project Contacts List*) is consulted prior to staging of equipment, trailers, materials, etc.

## Site Work Permits

The Construction Team is set to work on a “two zone” permit system. One zone is the Operations Safe Work Permit, and the other is the Construction Safe Work Permit. Both permits must be in place during project construction.

- **Operations Safe Work Permit** – In cases where constructions will take place within an operations-controlled area, it identifies all planned work up to a maximum of (7) seven days, or as directed by Operations. This permit will be completed by Operations (Steel Reef or 3<sup>rd</sup> Party) and issued to the Site Construction Supervisor who is responsible for permitting all construction work within the area defined in the Operations Safe Work Permit.  
  
Any concurrent work activities will be identified and addressed in the issuance of the Safe Work permit.
- **Construction Safe Work Permits** – Issued by the Site Construction Supervisor to any contractors working within the above defined work area. The site Construction Supervisor is responsible for all work that falls within the Construction Permit.

A high-level map of the project work area is shown below. Operations-controlled areas shall be identified with barriers and proper signage identifying where an Operations Safe Work permit is required. Construction workers must comply with the Operations Safe Work Permit requirements within the live operating facility.

For more information on the Steel Reef permitting system and procedure, refer to the *Control of Work Procedure (PR-CORP-8.2-001)*. This formal document provides an overview of the systematic control of work standards, systems, processes, and procedures to be used at Steel Reef worksites. The objective of the *Control of Work* is to provide a consistent system of work planning to ensure safe operations, maintenance, and other activities are provided for those working at Steel Reef’s operations.

[illegible]

- Commence Construction September 6<sup>th</sup>, 2022
- Mobilization – September 7<sup>th</sup>, 2022
- Construction Start date – September 7<sup>th</sup>, 2022
- Peak workforce – 35 people (pipeline), 30 people (facility)
- Commissioning – December 5<sup>th</sup>, 2022
- Start-up – December 21<sup>st</sup>, 2022

The following OHS legislation and regulations apply:

Saskatchewan	<ul style="list-style-type: none"> <li>• Saskatchewan Occupational Health &amp; Safety Regulations, 2020 amendment history: Chapter S-15.1 Reg 10 (effective April 1, 2021)</li> <li>• Saskatchewan Employment Act Chapter S-15.1, 2013 (effective April 29, 2014)</li> </ul>
Manitoba	<ul style="list-style-type: none"> <li>• Workplace Safety and Health Act W210 (2022) inclusive of:             <ul style="list-style-type: none"> <li>○ Workplace Safety and Health Regulation</li> <li>○ Administrative Penalties Regulation</li> <li>○ Operation Mines Regulation</li> </ul> </li> </ul>
Federal	<ul style="list-style-type: none"> <li>• Canada Labour Code Part II, RSC 1985c. L-2 Amended</li> </ul>

	<ul style="list-style-type: none"> <li>• Canada Occupational Health and Safety Regulations SOR/8-304 Regulations</li> <li>• Criminal Code of Canada Section 217.1 (Bill C-45)</li> <li>• Canadian Energy Regulator Act (S.C. 2019, c. 28, s. 10)</li> <li>• Canadian Energy Regulator Onshore Pipeline Regulations (section 6.5)</li> </ul>
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#### Other Legislative and Standards References:

- E-10.21 – The Environmental Management and Protection Act 2002. Repealed by Chapter E-10.22 of the Statutes of Saskatchewan, 2010 (effective June 1, 2015)
- Canadian Environmental Protection Act 1999 (CEPA 1999)
- CSA Z246.1-17 Security Management for Petroleum and Natural Gas Industry Systems.
- CSA Z246.2-18 (Emergency Preparedness and Response for Petroleum and Natural Gas Industry Systems)
- CSA Z1600-17 (Emergency and Continuity Management Program)
- API Security Vulnerability Assessment Methodology for the Petroleum and Petrochemical Industries.
- ANSI / API STD 780 Security Risk Assessment Methodology for the Petroleum and Petrochemical Industries.
- ANSI / ASIS SPC.1-2009 Organizational Resilience: Security, Preparedness, and Continuity Management Systems.

#### Key Safety Performance Indicators (KPIs)

Leading safety performance indicators are proactive activities that are designed to address potential hazards before they result in loss. Lagging safety performance indicators are any reactive event that results in a loss (called an incident).

The following targets have been established for proactive activities.

- A Job Safety Assessment (JSA) is required for all construction activities.
- All workers are required to complete the Steel Reef Safety Orientation before starting work. This can be done through ComplyWorks (the system used by Steel Reef to manage contractor requirements).
- Tailgate meetings are held daily and attended by all workers on site.
- JSA review meetings are to be held daily and attended by workers on site.
- Total hours worked, near misses and hazard identification (hazard IDs) are reported and discussed on a daily basis with workers.
- All incidents are recorded and reported to the Steel Reef supervisor responsible for the worksite within 24 hours.
- Appropriate audits and inspections are completed and documented on a daily basis, with findings reported at daily tailgate meetings.



## Safety Roles & Responsibilities

### Site Construction Supervisor

- Actively seek to provide a safe workplace for all workers.
- Evaluate JSAs to ensure effective hazard identification and mitigation is being done.
- Conduct a pre-job hazard assessment, according to Steel Reef's standards (via the SSSP).
- Coordinate activities on site which may affect the health and safety of the workers present
- Identify and report known hazards to all personnel on site. Immediately correct unsafe conditions or behaviours.
- Ensure that site personnel have eliminated the hazards identified by the Prime Contractor prior to work commencing. If a hazard cannot be reasonably eliminated, ensure adequate steps have been taken by site personnel to control and/or mitigate any residual risk.
- Implement corrective actions for identified hazards, within a timeframe correlated to the hazard level. Review with workers on the worksite.
- Ensure site personnel have appropriate occupational health and safety procedures, safe work practices, and necessary equipment in place prior to work commencing. Site personnel must be competent and informed of these procedures/practices, and familiar with safety equipment.
- Apply Steel Reef's safety policies, Occupational Health & Safety (OHS) legislation, agency regulations, and industry-recommended practices.
- Ensure that safety equipment, including personal protective equipment (PPE), is available onsite, properly stored, maintained in good order, and replaced when necessary.
- Educate employees/contractors how to work in a safe manner, use protective devices and procedures required by Steel Reef, and observe regulatory legislation to protect their health and safety.
- Inform workers of their 'Right to Refuse' unsafe work, if they believe an imminent danger exists to themselves or others, as identified in OHS regulations
- Authorize a 'stop work' when imminent danger is present at the work site or when hazards have not been assessed.
- Ensure all workers attending the worksite have completed an orientation before work commences.
- Communicate hazards to workers, and advise workers how to isolate, prevent and/or remove such hazards before work begins. This can take place during the permitting process as well.
- Report incidents and near-misses, as per Steel Reef's procedures.
- Confirm formal investigations are conducted when an incident occurs. Participate in incident investigations, as requested.
- Support health and safety compliance by conducting and documenting regular safety meetings and inspections.
- Confirm that safety manuals, required forms, OHS legislation, emergency response plans and emergency contact numbers are available at worksites.
- Maintain health and safety documentation, and ensure they are current with applicable legislation.
- Confirm emergency response plans are current, with applicable legislation, and the plan is followed.

- Arrange for medical response or treatment in the case of injury or illness, including transportation to a doctor or hospital, when necessary.
- Initiate a worksite safety plan addressing the regulatory requirements in compliance with OHS Acts, Codes, and Regulations.
- Confirm planned inspections are completed according to Steel Reef's procedures.
- Restrict or deny access to visitors to all or part of a worksite, based on the assessment of the risk to that person, or to the employees/contractors on the worksite, or if the visitor is not in compliance with minimum PPE standards.
- Provide visitors to the worksite with a briefing on site-specific or process-specific hazards and relative safety procedures. Ensure visitors are escorted while on the worksite.

### **Main Contractor**

Main contractor is defined as any person, entity, or company which has undertaken a contract with Steel Reef to provide materials, labour, or service.

- Actively seek to provide a safe workplace for all workers.
- Comply with all HS&E practices and procedures.
- Confirm personnel, including subcontractors, are competent to perform assigned tasks, are educated to work in a safe manner, and possess valid training as per work requirements.
- Ensure workers have completed a general safety orientation.
- Ensure all workers have completed a site orientation.
- Adhere and enforce the requirements of the SSSP.
- Report incidents and near-misses, as required by Steel Reef, as well as learning opportunities.
- Participate in pre-job meeting, site kick-off, and daily tailgates.
- Be aware of how off job activity and lifestyle impact job performance and reputation in the community.
- Maintain effective safety programs and procedures, which comply with or surpass Steel Reef's safety expectations, policies, and procedures, as well as contractual and regulatory requirements.
- Practice due diligence in training and documentation for new workers.
- Monitor work performance to confirm compliance of health and safety rules and procedures.
- Inform workers of their 'Right to Refuse' unsafe work, if they believe an imminent danger exists to themselves or others, as identified in OHS regulations.
- 'Stop work' when imminent danger is present at the work site and report immediately to supervisor or prime contractor.
- Participate in Steel Reef safety orientations, inspections, incident investigations or safety meetings.
- Confirm safety inspections are completed, as required.
- Review site-specific emergency response procedures, the location of emergency equipment, and the alarms/beacons used at the site.
- Develop and maintain a safety management system.

- Encourage workers to participate in health and safety initiatives and provide feedback with respect to the program.
- Insist on safe performance throughout their operations by providing the time and resources required for workers to do their work properly.
- Confirm workers are provided with and use all protective devices and procedures required by Steel Reef and regulatory legislation to protect their health and safety.
- Ensure workers demonstrate competent use of appropriate tools and personnel protective safety equipment.
- Confirm contractor-supplied vehicles, equipment, tools, and materials used at the worksite are inspected and maintained regularly.
- Formally inspect and maintain emergency equipment.
- Report hazardous conditions or situations, that can't be immediately resolved, to fellow employees/contractors as job competency lesson and management to correct the situation.
- Perform a pre-job hazard assessment and communicate hazards to workers before work begins.
- Monitor work tasks occasionally to confirm safe work permits and pre-job activities are completed effectively, provide feedback when necessary.
- Reinforce compliance to permit issuance procedures.
- Implement corrective action(s) for reported hazards or concerns that are identified from inspections, safety meetings or incident investigations.
- Share lessons learned with workers to reduce the potential for reoccurrence.
- Take all necessary precautions to keep the worksite free of hazards and communicate hazards to all individuals performing work at the worksite.
- Maintain good housekeeping conditions in all work areas.
- Comply with regulatory record keeping and reporting requirements, records should be available upon request by Steel Reef.

### Visitors

- Make reasonable efforts to notify the Site Supervisor at the worksite a minimum of 24 hours prior to the site visit.
- Report to the site supervisor and receive a site orientation.
- Follow the instructions of the site supervisor or personal escort.
- Wear personal protective equipment when required.
- Never walk about a worksite unescorted.
- Review emergency response requirements for the site and be aware of the predetermined evacuation point in case of an emergency; re-enter the worksite only as directed by a Steel Reef representative.

### Safety Orientation, Training, & Competency

A general safety orientation is required for all new, inexperienced, or transferred workers. Steel Reef accepts the following general safety orientation:

1. Preferred: Common Safety Orientation (CSO) certification.

## 2. Steel Reef's "Safety Orientation Handbook" – including successful completion of exam.

A site orientation will take place through review of the SSSP – which will take place with all workers ahead of work commencing. The SSSP is required for all work sites where construction activities are taking place; all workers attending the worksite must be oriented to the site-specific work hazards outlined in the SSSP.

General or basic training requirements are as follows:

- First Aid - required for all workers
- WHIMIS – required for all workers
- TDG – required for all workers
- H<sub>2</sub>S Alive – required for all workers at sour sites
- Confined space – required if performing work where entry into a confined space will take place.
- Ground disturbance – required if performing work where ground disturbance will take place.

It is the responsibility of each contractor (the employer) who has workers attending the worksite to ensure their personnel, including subcontractors, are competent to perform assigned tasks, are educated to work in a safe manner, and possess valid training as per work requirements.

## Safety Communication & Consultation

### Site Kick-off Meeting

- Scheduled prior to the commencement of work.
- SSSP will be reviewed during this meeting. Intent is to go through the SSSP in detail and identify any deficiencies. The SSSP will be updated with any changes identified in the kick-off meeting.
- The completed *Appendix A - Safety Risk Identification, Assessment & Control* – will be reviewed during the kick-off meeting.
- A template kick-off meeting agenda is included for reference in Appendix B.

### Tailgate Meetings

- Shall be conducted daily before work begins. Meeting minutes will be kept on record. Any corrective actions will be recorded along with person responsible and deadline for completion.
- All workers on site are required to attend daily tailgate meetings.
- Tailgate meeting will review the hazards of the work ahead and the specific measures required to protect workers from those hazards.

### Safety Documents & Records

The following list of records (at minimum) should be tracked and/or reported for the duration of the project:

- Proof of orientations – general and site specific
- Operations Safe Work Permits
- Construction Safe Work Permits

- Safety KPIs as referenced in *Key Safety Performance Indicators (KPIs)* section of the SSSP (total manhours worked, near misses and hazard IDs)
- Job Safety Assessments (JSAs) for construction activities
- Incident Reports (including follow up actions)
- Inspections completed
- Tailgate meeting minutes
- SDSs for any controlled or hazardous products

## Safety Inspections & Audits

The following safety inspections/ audits may take place during the construction phase of the project. In the event of inspection, it will be documented, along with any follow-up actions tracked for completion. Inspection outcomes will be reviewed at tailgate meetings with applicable contractors and workers.

- Informal worksite reviews
- Site inspections
- Project Manager site audits

## Incident Management

All employees/contractors shall immediately report all incidents, regardless of severity, to their immediate supervisor or the senior Site Representative. This enables Steel Reef to follow up as needed, verify safe work practices and other controls are working as intended, and analyze information to identify safety trends and performance indicators.

Near-miss incidents must also be reported, as a near-miss can highlight deficiencies in the safety management system. If something happens that could have reasonably caused a loss but does not actually result in loss (injury, damage, lost production, etc.) then it is classified as a near-miss. Steel Reef reports and follow ups on near-misses the same way as with an incident because identifying near-misses are an important part of an effective health and safety management system.

The workers involved in the incident are responsible for completing the Steel Reef Incident form (Appendix C), and a WCB employee report of injury (if applicable). The Project Manager is responsible for consulting with Steel Reef Senior Management to determining what level of incident investigation is required.

The following incidents are reportable to the relevant Regulator:

Regulator	Criteria	Phone Number
Manitoba Workplace Health and Safety	<p>When a serious incident occurs at a workplace, the employer is required to notify the Workplace Safety and Health Branch (WSH) of the incident immediately, and by the fastest means of communication available.</p> <p>Serious Incidents are those:</p> <ul style="list-style-type: none"> <li>• in which a worker is killed; or</li> <li>• in which a worker suffers: <ul style="list-style-type: none"> <li>○ an injury resulting from electrical contact,</li> <li>○ unconsciousness as the result of a concussion,</li> </ul> </li> </ul>	<p>1-855-957-SAFE (7233)</p> <p>Select 'Option 1'</p>

Regulator	Criteria	Phone Number
	<ul style="list-style-type: none"> <li>○ a fracture of his or her skull, spine, pelvis, arm, leg, hand, or foot,</li> <li>○ amputation of an arm, leg, hand, foot, finger, or toe,</li> <li>○ third degree burns,</li> <li>○ permanent or temporary loss of sight,</li> <li>○ a cut or laceration that requires medical treatment at a hospital as defined in The Health Services Insurance Act;</li> <li>○ asphyxiation or poisoning; or</li> <li>• that involves:               <ul style="list-style-type: none"> <li>○ the collapse or structural failure of a building, structure, crane, hoist, lift, temporary support system or excavation,</li> <li>○ an explosion, fire or flood, an uncontrolled spill or escape of a hazardous substance, or</li> <li>○ the failure of an atmosphere-supplying respirator.</li> </ul> </li> </ul>	
Saskatchewan Occupational Health and Safety Division	<p>An employer or contractor shall give notice to the Occupational Health and Safety Division as soon as is reasonably possible of every accident at a place of employment that:</p> <ol style="list-style-type: none"> <li>1. Causes, or may cause the death of a worker; or</li> <li>2. Will require a worker to be admitted to a hospital for 72 hours or more; or</li> <li>3. Dangerous occurrence</li> </ol> <p>A dangerous occurrence is any occurrence at a place of employment that did not result in, but could have resulted in, the death of a worker or required a worker to be admitted to a hospital as an in-patient for 72 hours or more, and includes:</p> <p>The structural failure or collapse of:</p> <ul style="list-style-type: none"> <li>• A structure, scaffold, temporary falsework, or concrete formwork; or</li> <li>• All or any part of an excavated shaft, tunnel, caisson, coffer dam, trench or excavation;</li> <li>• The failure of a crane or hoist, or the overturning of a crane or unit of powered mobile;</li> </ul> <p>An accidental contact with an energized electrical conductor;</p> <p>The bursting of a grinding wheel;</p> <p>An uncontrolled spill or escape of a toxic, corrosive, or explosive substance;</p> <p>A premature detonation or accidental detonation of explosives;</p> <p>The failure of an elevated or suspended platform; and</p> <p>The failure of an atmosphere-supplying respirator.</p>	1-800-567-7233
Canadian Energy Regulator	<p>The following require reporting to the CER:</p> <ul style="list-style-type: none"> <li>• Incidents under the CER Onshore Pipeline Regulations (OPR), CER Processing Plant Regulations (PPR):</li> <li>• unauthorized activities under the NEB Act and Pipeline Damage Prevention Regulations – Authorizations (DPR-A);</li> </ul>	403-299-2773 (CER)  819-997-7887 (Transportation Safety Board –

Regulator	Criteria	Phone Number
	<ul style="list-style-type: none"> <li>• pipeline damage and consent suspensions under the Pipeline Damage Prevention Regulations – Obligations of Pipeline Companies (DPR-O);</li> <li>• emergency burning or flaring under the PPR;</li> <li>• hazard identification under the PPR;</li> <li>• suspension of operations under the PPR;</li> <li>• near-misses under the DPR;</li> <li>• serious accidents or incidents under the Canada Oil and Gas Geophysical Operations Regulations/Oil and Gas Geophysical Operations Regulations;</li> <li>• emergencies or accidents under the Canada Oil and Gas Installation Regulations/Oil and Gas Installation Regulations; and</li> <li>• accidents, illnesses, and incidents under the Canada Oil and Gas Diving Regulations/Oil and Gas Diving Regulations.</li> </ul> <p>Incident is defined as:</p> <ul style="list-style-type: none"> <li>• the death of or serious injury to a person;</li> <li>• a significant adverse effect on the environment;</li> <li>• an unintended fire or explosion;</li> <li>• an unintended or uncontained release of low-vapour pressure (LVP) hydrocarbons in excess of 1.5 m<sup>3</sup>;</li> <li>• an unintended or uncontrolled release of gas or high-vapour pressure (HVP) hydrocarbons;</li> <li>• the operation of a pipeline beyond its design limits as determined under CSA Z662 or CSA Z276 or any operating limits imposed by the CER.</li> </ul> <p>Where regulations require an event to be reported “immediately” companies must also consider whether the event meets any of the following definitions:</p> <p>An Incident that Harms People or the Environment:</p> <ul style="list-style-type: none"> <li>• a death;</li> <li>• a serious injury (as defined in the OPR or TSB regulations);</li> <li>• an unintended or uncontrolled LVP hydrocarbon release in excess of 1.5 m<sup>3</sup> that leaves company property or occurs on or off the right of way;</li> <li>• an unintended or uncontrolled sweet natural gas or HVP release &gt;30,000 m<sup>3</sup>;</li> <li>• any unintended or uncontrolled release of sour natural gas or hydrogen sulfide; and/or</li> <li>• a significant adverse effect on the environment.</li> </ul> <p>A Rupture:</p> <ul style="list-style-type: none"> <li>• an instantaneous release that immediately impacts the operation of a pipeline segment such that the pressure of the segment cannot be maintained.</li> </ul> <p>A Toxic Plume:</p>	Single Window with CER)

Regulator	Criteria	Phone Number
	<ul style="list-style-type: none"> <li>a band of service fluid or other contaminant (e.g. hydrogen sulfide or smoke) resulting from an incident that causes people, including employees, to take protective measures (e.g. muster, shelter-in-place, or evacuation).</li> </ul>	

## Post Project Safety Review

The Post-Project Report will be completed at the end of the project.

This information will be captured as part of the overall project lessons learned report; potential learning outcomes will be reviewed for follow up and application in future projects – as applicable.

## Project Contact List

Position	Company and Name	Phone Number
Construction Supervisor:		
Steel Reef Project Manager:		
Engineering Consultant:		
Mechanical Contractor:		
Operations Contact:		
Land Department Contact:		

## Site Directions

Location LSD	Compressor and start of pipeline 16-32-007-29W1M
Project Area	Sinclair
Local GPS Coordinates	

Location LSD	Pipeline Tie-In Point 16-10-006-30W1M
Project Area	Nottingham
Local GPS Coordinates	

Location LSD	Nottingham Gas Plant
Project Area	8-17-005-32W1M
Local GPS Coordinates	



## Driving Directions and Map

Refer to Project Work Area Map.

From the intersection of Highways 9 and 13, in Carlyle, Saskatchewan:

- Head southeast on SK-13 E for 61.8km. This road turns into MB-2 E once in Manitoba.
- Continue on MB-2 E for 3.3km.
- Turn left onto Road 172 W for 4.9km.
- Turn left onto RD 42N. travel 230m.

From the intersection of Highway 1 and King Street E in Virden, Manitoba:

- Head northeast on Trans-Canada Hwy/MB-1 W for 3.0km.
- Turn left onto Provincial Trunk Hwy 83S/MB-83 S for 3.1km.
- Turn right onto MB-257 W for 19.6km
- Turn left onto MB-256 S for 21.3km.
- Turn right onto RD 44 N for 9.8km.
- Turn Left for 3.3km
- Turn right onto RD42N for 230m

## Emergency Contact Information

Service	Location	ETA	Number
First Aid	<i>On Site</i>	0	TBD
Ambulance	Carlyle, Wawota, Alida Saskatchewan	45mins	911
Air Ambulance	STARS (site #9932)		888-888-4567
Hospital	Galloway Health Centre – Oxbow	1hour 22mins	306-483-2956
Fire	Carlyle, Wawota, Alida Saskatchewan	45mins	911
RCMP/Police	Carlyle, Saskatchewan	60mins	911 306-453-6707
Poison Control	Manitoba Poison Control		855-776-4766
Spill /Hazardous Materials Response	SWAT Consulting		866-610-7928
Steel Reef Emergency Number <b>1-866-441-6203</b>			

**In the event of an incident or emergency situation:**

1. Protect yourself
2. Evacuate the area – go to the nearest muster station (up wind)
3. Leave the accident “as is” and do not disturb the scene
4. Sound the alarm, radio / call for help
5. Assess the hazard
6. Put on breathing apparatus if attempting a rescue in sour gas conditions
7. Rescue the victim
8. Administer first aid
9. Seek medical aid

Emergency Response Plans (ERPs) are documents that provide responders with quick access to critical information in order to respond to an emergency situation. ERPs address the elements of preparedness and response and are a key element in an Emergency Management Program.

Steel Reef has developed, implemented and continuously maintains an 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.

Security Management goes hand in hand with Emergency Management - they are key processes that both address organizational risk. Copies of the Steel Reef Emergency Response Plan (along with copies of the Security Response Plan) can be found electronically at: <https://www.steelreef-oms.ca/wiki/display/EMERG>

## Site Specific Security Response Information

Site-Specific Information pertaining to the asset is to be used in conjunction with the SRP and ERP.

*Note: This section of the SSSP is only applicable to CER-regulated assets.*

Name of Asset	Sinclair Pipeline and Compressor Site
Area Overview	SE Saskatchewan Area 2
Location of Asset (including travel information)	See page 15-16 above for directions and location
Location of Incident Command Post (name, location, contact information for activation)	Primary Incident Command Post Steelman 12-21-04-05 W2M Gas Plant 306-487-2551
Name of Supporting Area ERP	Area 2 ERP
Other Site-Specific Details	Greenfield facility and pipeline

Confirmation that a copy of the Supporting Area ERP available to on Site personnel and internal contact information confirmed to be up to date: Yes ☒

### Site / Local Contact Information

Name	Position	Business	Cellular
[REDACTED]	Construction Supervisor	Steel Reef Pipelines Canada Corp.	[REDACTED]
[REDACTED]	GGs Lead	Steel Reef Infrastructure Corp.	[REDACTED]

### Description of Operations covered under the Site-Specific SRP

Operation	Description
Facility	Construction of New Compressor Station
Pipeline	Construction of New 6-inch Carbon Steel Pipeline from 16-32 to 16-10

### Emergency Services Information

Agency	Location	Contact Information
First Aid	On Site	TBD
Ambulance	Carlyle, Wawota, Alida Saskatchewan	911
Air Ambulance	STARS (site #9932)	888-888-4567
Hospital	Galloway Health Centre – Oxbow	306-483-2956
Fire	Carlyle, Wawota, Alida Saskatchewan	911
RCMP/Police	Carlyle, Saskatchewan	911
Poison Control	Manitoba Poison Control	306-453-6707
Spill /Hazardous Materials Response	SWAT Consulting	855-776-4766
Steel Reef Emergency Number 1-866-441-6203		

*STVRA Summary*

Details of key outcomes of the Site's Security Threat Vulnerability Risk Assessment. A copy of the STVRA should be accessible to key site personnel

Current Threat Level	Low
Asset Classification	High
Overall Risk Level	Low (As Low As Reasonably Practicable [ALARP])
Any other relevant STVRA information	Ten (10) distinct threat types / security incident scenarios analyzed.

## Appendix A - Safety Risk Identification, Assessment & Management

The table below can be used to inspire discussion/thought on the risks encountered during specific phases of a project. The table also suggests potential controls to eliminate or mitigate the risk. Add or remove items from the list as necessary to reflect site specific hazards and controls for the project.

Project Phase	Primary Tasks	Potential Risks	Controls
Project Planning & Engineering	Existing operations (3 <sup>rd</sup> Party)	Oversights, impacting existing operations	Coordination with other producer's key construction personnel, two zone permit system (TBA)
	Compatibility with existing systems	Oversights	Interconnect points, maintenance access points, future fall protection, etc.
	HS&E	Oversights	Familiarity with Prime Contractor H&S Manual and General Contractor HS&E Programs
Contract Documents	HS&E expectations clearly set	Lack of understanding by one or more parties	Open communications with stakeholders
	HS&E scope & metrics developed	Oversights	Frequency & tolerances established, regular review of documents.
	Job site reinforcement of safety expectations	Oversights, lack of understanding of expectations, roles, and responsibilities.	Roles, and responsibilities, site inspection, defined tracking
Pre - Work Activities	Pre-work safety meeting	Oversights, missing or incomplete documentation	Project Management Team review, PPE selection, Job safety analysis, JSA reviews
	Combined safety / kick off meeting	Oversights	Coordination of combined tasks, open communication
	Contractor employee orientation	Oversights, of project risks	Project management, site orientations, team review
Mobilization	Travel to site	Motor vehicle accident	Obeying traffic rules, minimise travel during high-risk times, hands-free mobile device, no drug & alcohol, use RX eyewear, conflict avoidance, fatigue management guidelines.
		RX eyewear, sleep deprivation, drugs, alcohol use, distracted driving, civil disturbances.	
Construction	Contractor/ employee equipment	Incidents (equipment, vehicle & worker)	Project Planning & scheduling, proper site layout, & daily coordination of work activities. Site Traffic Plan, back in parking policy. 6-meter rule on all equipment. Spotters moving equipment on site
	Water / Waste Water establishment	Contamination, illness, environmental non-compliance	Establish temporary sanitation
	Site logistics preparation	Communication & organization issues.	Office trailers, electrical, phone service

Project Phase	Primary Tasks	Potential Risks	Controls
	Emergency preparedness	Not prepared for an emergency	Review emergency evacuation – muster points
	Travel to / from site	Motor vehicle accident	Obeying traffic rules, minimise travel during high-risk times, hands-free mobile device use, no drug & alcohol, use RX eyewear, conflict avoidance, fatigue management guidelines.
		sleep deprivation, drugs, alcohol use, civil disturbances.	
	Excavation / Ground disturbance	Excavation cave ins, U/G facility contact, fire, explosion, spills, environmental issues	Ground disturbance training, U/G line sweeps, excavation supervision, competent workers, work permits, spill containment
	Hot Work	Sparks, fire, explosion, cylinder handling & storage, eye/face injuries, respiratory	Reduction /Mitigation of fire hazards, equipment guards, PPE, Permits
	Overhead Power lines	Contact & damage, injury, power interruptions	Training, competent workers, permits, JSAs. Safe Limit of Approach is to be followed at all times. If voltage is not known at the time – default to the farthest limit of approach.
	Material Handling, Critical Lifts	Lifting injuries, load shifts/failure	Training, lifting, hoisting, crane safety procedures
	Waste Handling	Regulatory non-compliance, worker exposure	Training, documentation, PPE
	Materials Testing	Injuries, improper equipment use, inaccurate results, asset failure	NDT, hydro, compaction & PPE
	Electrical	Equipment failure, fire, explosion, electrical injuries	LOTO, training, competent workers, appropriate PPE
	Working at heights Scaffolds, lifts, ladders	Falling tools or equipment, equipment failure	Guardrails, / toe boards, tagging, fall arrest and restraint systems, training, PPE
	Commissioning	Equipment Failure, explosions, arc flash, electrocution, project delays,	Operations Permits, LOTO, purge, pressurizing, equipment testing, by competent workers, PPE
	Fitness for Work (workers)  <b>Applicable to all phases of the project</b>	Injuries, equipment failure (improper use), fire, release	Jobsite rules (no alcohol, drugs, or other impairments, no harassment or violence), alcohol & drug policy, respectful workplace, fatigue management guidelines.

Project Phase	Primary Tasks	Potential Risks	Controls
De-Mobilization	Travel from Site	Motor vehicle accident	Obeying traffic rules, minimise travel during high-risk times, no mobile device use, no drug & alcohol, use RX eyewear, conflict avoidance, fatigue management guidelines.
		Sleep deprivation, distracted driving, drugs, alcohol use, civil disturbances.	
	Workers & Equipment	Congestion incidents,	Project planning scheduling, proper site layout, coordination of demobilization activities
		Vehicle/ Worker	
	Site Restoration	Improper restoration	Trained competent workers, adequate project direction, proper equipment & Materials
	Remove Temporary Sanitation	Contamination, illness, environmental non-compliance	Trained, competent workers, PPE as required
	Disconnect Office trailer, electrical, LPG services	Site congestion, communication issues	Appropriate scheduling of activities

## Appendix B – Template: Construction Kickoff Meeting Agenda

### Introductions

- Welcome by site person or contracting officer
- Introductions and roles of each person in the post-award phase
- Objectives of the meeting

### Organization and Communications (Agency/ESCO)

- Function and authority of key agency personnel
- Function and authority of ESCO key personnel
- Roles and responsibilities of agency and ESCO
  - Emergency notification process
  - Communication protocols (process, emails, approvals, etc.)

### Reporting Requirements/Post Award Deliverables (Agency/ESCO)

- Ensure understanding of deliverables (i.e., design and construction package submittal)
- Approvals required prior to construction release – review/approval of submittals and drawings.
  - Confirm requirements for Notice to Proceed (NTP)
- Scope changes
- Deliverables
  - Site safety plan
  - Quality control plan
  - Bonding and insurance
  - Updated organizational chart (if needed)
  - Updated implementation schedule

### Contract Clauses (Agency/ESCO)

- General and construction contract clauses
  - Ensure understanding of all relevant post-award clauses associated with the construction portion of the task order requirements (i.e., payroll records, subcontractor requirements, labor reporting/Davis Bacon protocols)
- Government furnished property & contractor furnished material (applicable or not applicable)

### Site-Specific Facility Access & Security Requirements (Agency/ESCO)

- Project office/ siting approval
- Contractor personnel site and/or building access requirements
- Security badging process and badging/ lower-tier subcontractor list
- Escorts – process and coordination
- Restrictions/allowable equipment (e.g., cell phones, laptops, and radios)
- Vehicle access approval requirements
- On- and off-hour access
- Keys (If applicable)
- Vehicle licensing /registration
- Staging/lay-down yard and/or office space allocations for contractors

### Design/Construction (ESCO)

- Construction Schedule
- Design and design review schedule
- Schedule for design/construction update meetings
- Project status reports



- Plan of the Day (POD)/Plan of the Week (POW) meetings during construction (see page 2 sample agenda)
- Engineering drawing approval requirements (prior to construction)
- Equipment data sheets, submittal review and approval process
- Specification review and approval process
- Project charter and partnering session
- Weekly meetings

**Invoicing Procedure**

- Daily work orders signed by
- Signed out work orders sent to
- Invoices approved by

**Environment, Health & Safety Planning (Agency/Site Staff)**

- Site-specific safety plan, worker licensing and certifications
- Burn permit approval requirements
- Safety training
- Hazardous materials
  - Either stored or as a part of the facility, have been located and identified
  - Site specific requirements for hazardous material handling identified
  - Asbestos, MSDS, PCB's, lead based paint, etc.
- Site injury reporting and response requirements
- Environmental permits prior to construction

**Outages/Permits (Agency)**

- Utility service interruption permits approval
- Utility reconnect permits approval (including hot-work permits)
- Site personnel support for outages
- Service interruption scheduling
- Low voltage outage permits

Mechanical Contractor and Inspector(s) shall refer to Appendix C.4 (Fuels and Hazardous Materials Spill Contingency Plan) and C.5 (Fire Contingency Plan) of the EPP for additional guidelines on incident reporting and mitigations. The spill report form in Appendix C.4 shall be used to supplement the Incident/Accident Report Form below:

[illegible]

<input type="checkbox"/> Injury	<input type="checkbox"/> Stuck By or Against	<input type="checkbox"/> Caught on or Between	<input type="checkbox"/> Exposure	<input type="checkbox"/> Slip	<input type="checkbox"/> Trip	<input type="checkbox"/> Fall
<input type="checkbox"/> Contact With	<input type="checkbox"/> Overexertion	<input type="checkbox"/> Foreign Body	<input type="checkbox"/> Other (specify)			
<input type="checkbox"/> Damage	<input type="checkbox"/> Malfunction	<input type="checkbox"/> Fire	<input type="checkbox"/> Explosion	<input type="checkbox"/> Vandalism	<input type="checkbox"/> Procedural	<input type="checkbox"/> Leak
<input type="checkbox"/> Struck By or Against	<input type="checkbox"/> Stuck/Sunk	<input type="checkbox"/> Trip	<input type="checkbox"/> Other (specify)			
<input type="checkbox"/> Production	<input type="checkbox"/> Product Loss	<input type="checkbox"/> Spill	<input type="checkbox"/> Flaring	<input type="checkbox"/> Leak	<input type="checkbox"/> Stopping	<input type="checkbox"/> Interruption
	<input type="checkbox"/> Degradation	<input type="checkbox"/> Other (specify)				
<input type="checkbox"/> Environmental	<input type="checkbox"/> Spills	<input type="checkbox"/> Flaring	<input type="checkbox"/> Emission	<input type="checkbox"/> Land Disturbance	<input type="checkbox"/> Pollution	<input type="checkbox"/> Leak
<input type="checkbox"/> Other (specify)						
<input type="checkbox"/> Security	<input type="checkbox"/> Arson	<input type="checkbox"/> Theft	<input type="checkbox"/> Lost	<input type="checkbox"/> Vandalism	<input type="checkbox"/> Other (specify)	

**12) Severity:**

**Actual:** ☐ Minor ☐ Medium ☐ Major **Potential:** ☐ Minor ☐ Medium ☐ Major  
**Formal Investigation:** ☐ Yes ☐ No **Frequency:** ☐ Rare ☐ Occasional ☐ Frequent  
**Potential for Recurrence:** ☐ Low ☐ Medium ☐ High  
**Note:** All major, frequent and high recurrence incidents are to be investigated

**13) For Injury/Illnesses Only:** *(This section only to be filled out for injury / illness)*
**Body Part(s) Injured:**

☐ Eyes ☐ Head ☐ Fingers ☐ Hands ☐ Arms ☐ Back ☐ Knees ☐ Legs ☐ Trunk  
☐ Feet ☐ Internal ☐ Other: *(specify)* \_\_\_\_\_

**Injury/Illness Classification:**

☐ First Aid ☐ Medical Aid ☐ Restricted Duty ☐ Lost Time Incident ☐ Fatality

**Note:** Investigation required for M.A., R.D., L.T.I and Fatality

**Nature of Injury:**

☐ Cut ☐ Fracture ☐ Crush ☐ Burn ☐ Allergy ☐ Bruise ☐ Sprain/Strain ☐ Scrape  
☐ Shock  
☐ Welding Flash ☐ Amputation ☐ Foreign Body ☐ Other: *(specify)* \_\_\_\_\_

**14) Cost: Estimated** *(Incident cost includes: manpower, equipment, lost hours, production loss, replacement and repair):*

\_\_\_\_\_

**15) Causes: –** *(Refer to Identification of All Causal Factors - Page 3)*

Immediate: \_\_\_\_\_

Basic: \_\_\_\_\_

**Corrective Actions / Work to Control Loss**
**by Whom**
**Date Due**


**16) Signed:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
*(By Person Completing Report)*

**17) Signed Off by:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
*(Supervision/ Management Onsite)*

**Signed Off by:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
*(Project or Site Manager)*

**Signed Off by:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
*(Area Manager)*

*(Near Miss Incidents and incidents that are not major or require formal investigation may not need Manager's Signature)*

## Identification of All Causal Factors

### Immediate Causes

#### Substandard Actions

- |  |   |
|--|---|
| <input type="checkbox"/> Operating without authority                       | <input type="checkbox"/> Failure to warn or secure  |
| <input type="checkbox"/> Tampering or unauthorized                         | <input type="checkbox"/> Unsafe lifting or carrying |
| <input type="checkbox"/> Unsafe position                                   | <input type="checkbox"/> Inattentive to job hazards |
| <input type="checkbox"/> Trying to gain or save time                       | <input type="checkbox"/> Procedural deviation       |
| <input type="checkbox"/> Working unsafely on moving or dangerous equipment |   |
| <input type="checkbox"/> Other (specify): _____                            |   |

#### Substandard Conditions

- |  |  |
|--|--|
| <input type="checkbox"/> Inadequately guarded                  | <input type="checkbox"/> Inadequate illumination   |
| <input type="checkbox"/> Inadequate ventilation                | <input type="checkbox"/> Substandard housekeeping  |
| <input type="checkbox"/> Congested area                        | <input type="checkbox"/> Inadequate warning system |
| <input type="checkbox"/> Defective equipment, materials, tools | <input type="checkbox"/>                           |
| <input type="checkbox"/> Other (specify): _____                |  |

#### Contributing Factors

- |  |   |
|--|---|
| <input type="checkbox"/> Tried to avoid extra effort                   | <input type="checkbox"/> Exposed to extreme temperature |
| <input type="checkbox"/> Insufficient line-up/follow-up by supervision |   |
| <input type="checkbox"/> Other (specify): _____                        |   |

### Basic Causes

- |  |   |
|--|---|
| <input type="checkbox"/> Inadequate design or construction | <input type="checkbox"/> Worn out from normal use |
| <input type="checkbox"/> Low maintenance standards         | <input type="checkbox"/> Low purchasing standards |
| <input type="checkbox"/> Low work standard                 | <input type="checkbox"/> Overlooked by inspection |
| <input type="checkbox"/> Lack of knowledge or skill        | <input type="checkbox"/> Physical problems        |
| <input type="checkbox"/> Improper motivation               | <input type="checkbox"/> Insufficient planning    |
| <input type="checkbox"/> Other (specify): _____            |   |

### Work to Control Loss / Recommendations to Prevent Recurrence

- |   |  |
|---|--|
| <input type="checkbox"/> Training required                    | <input type="checkbox"/> Implement corrective action       |
| <input type="checkbox"/> Instruct persons involved            | <input type="checkbox"/> Improve inspection                |
| <input type="checkbox"/> Reassign person(s) involved          | <input type="checkbox"/> Improve design                    |
| <input type="checkbox"/> Improve housekeeping clean-up        | <input type="checkbox"/> Improve protective equipment      |
| <input type="checkbox"/> Require procedure or revision        | <input type="checkbox"/> Improve rules and regulations     |
| <input type="checkbox"/> Inform department personnel          | <input type="checkbox"/> Improve compliance with standards |
| <input type="checkbox"/> Repair, replace or provide equipment |  |
| <input type="checkbox"/> Other (specify): _____               |  |



Date of Incident: \_\_\_\_\_ Time of Incident: \_\_\_\_\_

Name and Occupation: \_\_\_\_\_

Location of Incident: \_\_\_\_\_

Incident: \_\_\_\_\_

Statement:

[illegible]

Signed: \_\_\_\_\_ Date / Time: \_\_\_\_\_

**Note:** if more room is needed for statement, use the reverse of this page.

## Incident / Accident Checklist

During an incident or post incident, refer to following Checklist. *(optional)*

### 1.0 Notifications

- |   |   |
|---|---|
| <input type="checkbox"/> R.C.M.P                      | <input type="checkbox"/> Site Neighbours                |
| <input type="checkbox"/> Fire Department              | <input type="checkbox"/> Other Companies in Area        |
| <input type="checkbox"/> Alberta Energy Regulator     | <input type="checkbox"/> AEP (regulatory)               |
| <input type="checkbox"/> Occupational Health & Safety | <input type="checkbox"/> Workers Compensation Board     |
| <input type="checkbox"/> Company Management           | <input type="checkbox"/> Canutec                        |
| <input type="checkbox"/> Department of Transportation | <input type="checkbox"/> Insurance                      |
| <input type="checkbox"/> Railway                      | <input type="checkbox"/> Municipality                   |
| <input type="checkbox"/> Wildlife officer             | <input type="checkbox"/> Other <i>(specify)</i> : _____ |

### 2.0 Information/ Data Gathering:

- |   |   |
|---|---|
| <input type="checkbox"/> Statements from Involved and Witnesses | <input type="checkbox"/> Log Books                      |
| <input type="checkbox"/> Statements from Contactor Companies    | <input type="checkbox"/> Work Permits Included          |
| <input type="checkbox"/> Pictures of Incident/Area              | <input type="checkbox"/> Policies/Procedures Included   |
| <input type="checkbox"/> Sketches of Incident/Area              | <input type="checkbox"/> Alarm Summaries                |
| <input type="checkbox"/> Field Conditions Identified            | <input type="checkbox"/> Other <i>(specify)</i> : _____ |

### 3.0 Scene

**DO NOT** Disturb the scene of an Incident / Accident unless:

- ☐ Attending to persons injured or killed
- ☐ Preventing further injuries
- ☐ Protecting property that is endangered as a result of the incident

### 4.0 Other

- ☐ Samples *(if necessary)*
- ☐ Insurance claims initiated
- ☐ Call out procedure initiated
- ☐ Equipment shut-down if necessary
- ☐ Other *(specify)*: \_\_\_\_\_

## Appendix D – Security Response Plan (CER-regulated Assets)

Refer to SRIC Procedure PR-CORP-7.3-003 for a full copy of the Security Response Plan.

### Purpose

There may be situations when Steel Reef Infrastructure Corporation (SRIC) worksites will be required to operate under specific circumstances with respect to a security incident having occurred or the threat of a security incident occurring.

The purpose of the SRIC Security Response Plan (SRP) is to outline the pre-determined countermeasures and actions that may be required in the event of a security incident or increase in threat level. The SRP can assist management in responding to and making decisions in a practical manner as and when the threat of a security incident occurs.

Pre-determined activities could include but are not limited to:

- Enhancing certain security measures to deter/ minimize the threat from being carried out.
- Undertake actions to mitigate potential consequences if a threat is carried out and/or there is a resulting security incident.
- Assisting in any Police investigation to understand why a threat was made or security incident occurred, and potentially identify the perpetrator(s).
- Assessing the veracity of a threat, and likelihood of the threat being carried out.

In the event of a threat or security incident, analysis of the circumstances may necessitate the need to enhance existing security measures or employ security measures which do not exist -depending on the seriousness of the circumstances. Responding to a threat or security incident could also have impact to operations.

SRIC utilises an Incident Command System (ICS) structure when responding to emergency situations, including those which are security-related, which may necessitate the activation of an Incident Command Post (ICP) and Emergency Operations Centre (EOC). In the event of a security incident SRIC may activate its corporate-level Emergency Response Plan (ERP) in conjunction with the SRP.

### Definitions

For the purposes of this procedure, Steel Reef Infrastructure Corp. (SRIC) has adopted the definitions found in *CSA Z246.1-17 Security management for petroleum and natural gas industry systems*.

### Scope and Application

Any asset under SRIC control is subject to the guidelines specified in the SRP. Federally regulated assets will have a specific security response plan in place.

The SRP is designed to be used in conjunction with the SRIC corporate-level ERP. In the event of a security threat or incident that meets the criteria for activation of the Corporate EOC, both response plans will be implemented. The SRIC corporate-level ERP describes the roles, responsibilities, and response structures that are in place to respond to emergency situations – including those that are due to security threats and incidents.

### Roles and Responsibilities

All applicable personnel are accountable for conformance with this procedure.

### Threat Levels

SRIC has established the following threat levels when evaluating the threat environment for an applicable asset. Threat levels may also be reviewed in conjunction with the SRIC emergency classification matrix as applicable.

Should a significant security incident occur at a SRIC asset, the threat level may be raised accordingly depending on the circumstances surrounding the incident.

<b>LOW Threat</b> <b>Standard Operating Procedures</b> <b>SRIC Risk Matrix Low</b>	<b>MODERATE Threat</b> <b><i>On Alert with heightened awareness</i></b> <b>SRIC Risk Matrix Moderate</b>	<b>HIGH Threat</b> <b><i>Imminent or immediate threat potential</i></b> <b>SRIC Risk Matrix High or Critical</b>
--	--	--

In accordance with the SRIC Security Risk Assessment Procedure, applicable assets undergo a Security Threat Vulnerability Risk Assessment -which includes a review of potential threats and the establishment of the current threat environment.

A review of the threat environment will occur if new information is received and determined to be relevant to the security of the asset. In the event of a security incident or escalation of the threat environment, additional actions and measures may be taken – as outlined in the security response plan.

Escalation of the threat level can result in a strain on resources, significant costs, and/or interruption to operations. As such, increasing the threat level should be limited or temporary until the reason for increasing the level no longer exists or has been resolved.

The decision to raise the asset threat level from “Low” will be managed through the Operation Management Team in consultation with appropriate levels of Executive Management.

The decision to raise and lower the security threat level rests with the Vice President of Operations, in consultation with the Executive Management Team.

Any escalation and subsequent de-escalation of the threat level requires communication with all impacted stakeholders. This is expected to occur in accordance with the crisis communication protocols outlined in the SRIC corporate-level ERP.



### Threat Level Countermeasures

Each threat level has a set of corresponding countermeasures that are required to be considered. Refer to the following table for a description of the pre-determined countermeasures.

<b>LOW Threat</b>	<p>All normal operating procedures remain in place.</p> <p><b>Low Threat management strategy:</b></p> <ul style="list-style-type: none"> <li>• Employees and Contractors must wear visible identification will on site.</li> <li>• Review of ERPs and SRP will occur on at least an annual basis.</li> <li>• Tabletop emergency response plan exercises should occur on at least an annual basis. Major exercises will occur at least once every 3 years.</li> <li>• Security Threat Vulnerability Risk Assessments will be reviewed annually with applicable personnel. Significant changes will prompt a re-assessment.</li> <li>• Data backup and protection should occur in accordance with current IT policies and procedures.</li> <li>• Information Technology security processes should ensure all security upgrades are automated and urgent updates should require a force reboot of work terminals.</li> <li>• Employees with remote access should be reviewed at least annually.</li> <li>• Formalized plans for employee layoffs or terminations will be made to any employee notification and will include security considerations.</li> <li>• The health and safety program – including incident management procedures - is in place and reviewed at least on an annual basis.</li> <li>• Employees should be aware that any access and/or communication made on SRIC resources is subject to monitoring.</li> </ul>
<b>MODERATE Threat</b>	<p>All low threat management plans will remain in place. Personnel are on alert with heightened awareness</p> <p><b>Moderate Threat Management Strategy:</b></p> <ul style="list-style-type: none"> <li>• Implementation of the SRP. Conduct internal notifications.</li> <li>• As applicable - signage will be changed to indicate the site is operating under a Moderate Threat. The signage will remain in place until the threat level is de-escalated.</li> <li>• Placement of security guards will be reviewed and deployed as needed.</li> <li>• If applicable, camera systems at the impacted site will be installed and tested to confirm functionality.</li> </ul>

	<ul style="list-style-type: none"> <li>• Site personnel will be advised to be aware of suspicious persons, vehicles, or packages.</li> <li>• Communication (primary and backup) will be tested and confirmed operational (within 24 hours of the threat escalation).</li> <li>• Law enforcement will be notified.</li> <li>• Security gates/ doors will be locked at the site if applicable. Only approved personnel will be granted unescorted access. All visitors will be escorted by a SRIC representative.</li> <li>• Information Technology (IT) services will be made aware of the threat and consideration should be made to increase IT scrutiny on electronic devices. The IT response plan will be implemented if the threat is determined to be cybersecurity related.</li> <li>• Consideration should be given to deploying resources to monitor social media.</li> <li>• A review of the ERP incident classification matrix should be completed to determine if the corporate-level ERP should be activated.</li> </ul>
<b>HIGH Threat</b>	<p>All low and moderate threat management plans will remain in place. There is imminent or immediate threat potential with significant impact to the organization.</p> <p><b>High Threat Management Strategy:</b></p> <ul style="list-style-type: none"> <li>• Implementation of the SRP. Conduct internal notifications.</li> <li>• As applicable - signage will be changed to indicate the site is operating under a High Threat. The signage will remain in place until the threat level is de-escalated.</li> <li>• High Threat levels will be reviewed every 2 days by the Corporate Emergency Response Team.</li> <li>• SRIC will activate the corporate-level ERP as to establish a command centre to respond to the high threat situation. The staffing of ERP positions in the EOC or ICP will be determined by the specific threat circumstances.</li> <li>• Liaison with law enforcement and applicable regulatory agencies will occur in accordance with the specific threat circumstances and ERP protocols.</li> <li>• Exterior lighting/generators will be tested at the site.</li> <li>• Life safety resources will be tested at the site.</li> <li>• No unescorted access to the site will be permitted.</li> </ul>

- All essential personal will be placed on-call / on alert in accordance with the SRIC ERP.
- All gates/doors will be locked (24/7) and monitored (either in person or via electronic means).
- Access by non-essential personnel will be carefully reviewed and approved by the Corporate Emergency Response Team.
- Perimeters and areas surrounding impacted sites will be monitored and/or enforced.
- If cameras have been installed, then they will be tested to confirm they are monitoring and recording (24/7).
- All deliveries of packages to the impacted site will be screened at an off-site central location.
- All vehicles should be inspected prior to entering the work site. This should include the undercarriage and the interior of attached trailers.
- A site access plan will be developed and implemented to limit and control access. Consideration should be given to blocking off access roads with blockages or heavy equipment.
- Consideration should be given to company-provided transportation of personnel who are required to be at the site.
- Personnel at or associated with the site will be informed of the High Threat level and the corresponding measures being put in place.
- Information Technology (IT) services will be made aware of the threat and consideration should be made to increase IT scrutiny on electronic devices. The IT response plan will be implemented if the threat is determined to be cybersecurity related.

### *Security Incidents*

Some security incidents may not prompt an escalation in threat level; however, a review of each security incident will be conducted to confirm or validate the threat environment.

In accordance with CSA Z-246.1-17, SRIC has procedures in place to address specific security incident types – which include the following:

- bomb threats;
- suspicious packages;
- workplace violence;
- theft;
- terrorism;
- vandalism;
- civil disturbance;
- unauthorized entry;
- control systems or information technology attack; and
- suspicious activities;

The SRIC corporate-level ERP (Section 4), along with the incident management procedures described in the SRIC Health and Safety Program describe the expected steps for reporting, responding, communicating, documenting, and investigating incidents – including security incidents.

Additionally, there is a functional IT response plan in place that outlines specific measures and procedures in place for cybersecurity incidents and emerging cybersecurity threats.

## Appendix E – Health, Safety and Environment Policy



### CORPORATE HEALTH, SAFETY AND ENVIRONMENTAL (HSE) POLICY

Steel Reef Infrastructure Corp.'s HSE culture is built on a foundation of value through:

- **Visible leadership** and commitment to a safe workplace, from senior management to the front-line;
- Ensuring all workers **understand the workplace risks**, are well-trained to manage those risks, and communicate consistently as a team;
- Expecting individuals to **take responsibility** for their own safety as well as for the safety of others.

It is the goal of Steel Reef Infrastructure Corp. to ensure that practical and effective measures are used to:

- Protect the health and safety of the company's employees, contractors, and the public.
- Safeguard the environment.
- Comply with all relevant Health, Safety and Environmental (HSE) and Damage Prevention legislation.
- Commit to continuously improve its HSE performance.

Everyone who works for Steel Reef Infrastructure Corp. (Steel Reef) shares the responsibility for workplace health and safety. Management and Supervisors have an additional responsibility to lead by example and are actively involved in the communication and implementation of the Company's HSE and Damage Prevention Program activities. Management will also ensure that the necessary equipment, training and procedures required for compliance with applicable legislation are provided.

All personnel are expected to comply with the rules and procedures as identified in applicable legislation and company documentation, as well as participate in the development of the Company HSE and Damage Prevention Program initiatives. Workers who knowingly violate safety rules will face disciplinary action.

Everyone has the right and responsibility to identify and refuse unsafe work. All hazards, potential hazards, incidents, and near-misses that occur on a Steel Reef worksite are expected to be reported. Workers will not face disciplinary action for reporting hazards, potential hazards, incidents, and near-misses.

A joint effort by management, employees and contractors is expected from all involved to maintain good and continuously improving safety, health and environmental performance.



Austin Voss  
Chief Operating Officer

22-January-2019  
Date