

# Summary of Issues – Crosswalk Document

## Black Bear Power Plant Project

### KIWETINOHK RESPONSE

December 11, 2024

**Table I – Issues to Inform the Impact Assessment Agency of Canada’s Decision on Whether an Impact Assessment is Required**

The following table provides a high-level summary of key issues that were submitted to the Impact Assessment Agency of Canada (IAAC) about the Black Bear Power Plant Project (the Project or BBPP) during the public comment period on the Summary of the Initial Project Description, submitted by Kiwetinohk Energy Corp. (the Proponent or “Kiwetinohk”). In addition to issues raised by federal and provincial authorities, Indigenous groups, and the public, IAAC also included issues it considers relevant in this table. The issues included below relate to information that will support decision making by IAAC on whether an impact assessment is required under section 16 of the *Impact Assessment Act*. The original submissions are available online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 88747).

Where there are cross-cutting issues relating to multiple areas of federal jurisdiction, IAAC has included these issues under the heading for the primary effect pathway and noted the other areas of federal jurisdiction that would apply.

In these responses, Kiwetinohk has used the term “Indigenous Groups” to collectively refer to First Nations, Métis Settlements and the Otipemisiwak Métis Government.

Issues	Registry Comment Number	Response
<b>Fish and Fish Habitat</b>		
1. Describe potential effects to fish and fish habitat and identify waterbodies (streams, lakes, wetlands) that have the potential to be directly or indirectly affected by project activities. Provide additional information on the Project’s potential to cause direct or indirect effects on the identified waterbodies during construction and operation.	15, 17, 12	<p>Kiwetinohk has worked to reduce the BBPP’s environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with the Alberta <i>Water Act</i> and other Alberta Environment and Protected Area’s water and wetlands regulations that consider cumulative impacts, the BBPP is not anticipated to impact fish or fish habitat.</p> <p>BBPP environmental impact mitigation measures include:</p> <ul style="list-style-type: none"> <li>• Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> </ul>

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		<ul style="list-style-type: none"> <li>Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has sufficient year around volumes to support potential diversion rates with no impacts to fish or fish habitat. (See section 9.1.3. Water Supply of the Initial Project Description.)</li> </ul> <p>Detailed information on point of diversion (POD) construction via an existing access to the river and required Department of Fisheries and Oceans fish and fish habitat protection measures is also available in the Initial Project Description. It is anticipated that Alberta Environment and Protected Areas will issue an approval with restrictive conditions to ensure authorized diversion only when Freeman River has sufficient flow to support the diversion rates.</p> <p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p> <p>There are no watercourses within, or immediately adjacent to, the BBPP. As such, no impacts to fish or fish habitat within or adjacent to BBPP's boundary are anticipated.</p> <ul style="list-style-type: none"> <li>Industrial Water Run Off: Surface water runoff from the BBPP site would be collected in the storm water pond. Water meeting Alberta provincial standards for release may be released to adjoining upland areas. Water not meeting Alberta provincial standards for release would be pumped into a truck for disposal at an approved disposal site. Site design would not allow surplus run off to enter a watercourse. Migratory bird monitoring would be implemented and deterrents used, if required.</li> <li>Industrial Wastewater Disposal: Industrial wastewater would be disposed of at approved wastewater disposal facilities.</li> <li>Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</li> </ul> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p> <ul style="list-style-type: none"> <li>Watercourses - Transmission Line &amp; Pipeline Impacts:</li> </ul>

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		<p>Transmission Line: There are no watercourse crossings associated with the transmission line. While final routing will be determined by provincial power regulators, all access would follow the most direct route deviating only to accommodate topography constraints and avoid environmental features. Therefore, there are no interactions of the transmission line with fish or fish habitat.</p> <p>Pipeline: All pipelines would be installed under watercourses using directional drilling. No disturbance to riparian vegetation, bed or banks would therefore occur. There would be no impacts to fish or fish habitat. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator (AER).</p>
<b>Migratory Birds and their Habitat</b>		
<p>2. Clarify how the Project will comply with the <i>Migratory Birds Convention Act, 1994</i> and its regulations, and provide details of planned monitoring measures for migratory birds that nest in or around project infrastructure.</p>	<p>12</p>	<p><i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible.</li> </ol> <p>Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</p> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west</p>

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<p>3. Provide additional information on potential project effects on migratory birds (e.g. habitat loss, sensory disturbance from light, noise, and vibrations, worker presence, accidental spills, etc.), and proposed monitoring, avoidance, and mitigation measures to address these effects.</p>	12	<p>Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta’s regulatory requirements to support the BBPP’s environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife avoidance measures, track observations and use best practices where conflicts with wildlife may occur.</p> <p><i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act (MBCA)</i> compliance:</p> <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible</li> </ol> <p>Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the <i>Alberta Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</p> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west</p>

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<b>Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes</b>		
4. Provide additional information on species of vegetation used for cultural purposes that are or may be found in the project area, including species of cultural significance to Indigenous peoples.	18, 17	<p>The BBPP vegetation assessment at the BBPP did not identify any evidence of plant gathering or plant species at risk. Overall, the plant species identified at the BBPP are common to the area. A list of identified plant species is provided in Section 14.6.2 of the Initial Project Description. Through engagement, Kiwetinohk learned some plant species present on the proposed site are in traditional use, however there is no evidence of their use on the proposed BBPP site. If the BBPP is approved to proceed, Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p> <p>Due to previous logging and herbicide application, Kiwetinohk is advised by an Indigenous Group that the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which is in an industrial area, has previous disturbance through logging, and may be of less value for harvesting than other areas in the region due to previous herbicide application.</p> <p>Biodiversity on the proposed BBPP site is well represented in the region and therefore development of the site is not expected to impact Indigenous traditional uses or spiritual practices.</p>
5. Provide additional information regarding potential project effects to Indigenous peoples' current use of lands and resources for traditional purposes, including consideration of potential cumulative effects of other industrial land use in the region, and proposed mitigation measures to address these effects. If project related effects are not anticipated, provide a clear rationale to support this conclusion.	18	<p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>BBPP environmental impact mitigation measures include:</p> <ul style="list-style-type: none"> <li>• Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> <li>• Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has</li> </ul>

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		<p>Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p> <p>Due to previous logging and herbicide application, Kiwetinohk is advised by an Indigenous Group that the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which is in an industrial area, has previous disturbance through logging, and may be of less value for harvesting than other areas in the region due to previous herbicide application.</p> <p>Biodiversity on the proposed BBPP site is well represented in the region and therefore development of the site is not expected to impact Indigenous traditional uses or spiritual practices.</p> <p>Traditional Land Use Studies: Some Indigenous Groups indicated interest in the potential of traditional land use studies to help determine the effects of the BBPP on current and traditional land uses. If the BBPP is approved, Kiwetinohk would continue to engage interested Indigenous Groups with respect to the scope of a traditional use study, seeking to establish, for example, an understanding of potential study participants and terms of reference. Kiwetinohk would consider funding a proportional amount of study costs with other partners such as government and industry.</p> <p>Cumulative Effects: Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.</p>
<p>6. Describe potential project effects to culturally significant fish species in the Freeman River, including walleye, northern pike, and rainbow trout.</p>	<p>17</p>	<p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area</p> <p>BBPP environmental impact mitigation measures include:</p>

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<p>7. Provide additional information regarding mitigation measures that will be implemented to address effects to the current use of lands and resources for traditional purposes and Indigenous peoples' health as a result of noise from project-related components and activities. Include a discussion of the noise disturbance communication plan and noise complaint resolution process.</p>	<p>18, 20, 17</p>	<p>Noise: The BBPP is located in an existing heavy industrial area with no residences located in within the vicinity of the BBPP site. Noise modelling was completed using the highest noise levels associated with the operating facility, therefore, modelling assumes the highest possible levels at all times. As the BBPP operates and different equipment operates as required, any noise emissions would not exceed the permissible sound levels.</p> <p>Noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to wildlife and migratory birds. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</p> <p>To avoid conflict and complaints, Kiwetinohk would seek engagement with area Indigenous Groups on emergency response and / or emergency notifications, wildlife and environmental reporting, and seek to coordinate maintenance and operations scheduling to avoid specific events or times identified, and to obtain input to its Compliant Resolution Plan (CRP).</p> <p>The CRP will include Kiwetinohk's procedures for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP would include:</p> <ul style="list-style-type: none"> <li>• Creating an accessible online portal to receive information from individuals or groups who have questions about the BBPP or have concerns.</li> <li>• Manage concerns and complaints openly, promptly and fulsomely.</li> <li>• Investigating the cause of complaints and take actions, if needed, to correct the problem.</li> <li>• Resolve concerns and complaints in a timely fashion; and</li> <li>• Learn from past experiences, maintain diligence in its ongoing operations and reduce impacts of the BBPP on the community.</li> </ul> <p>The CRP would:</p> <ol style="list-style-type: none"> <li>1. Record inquiries, comments, and complaints.</li> <li>2. Manage and record responses to inquiries, comments, and complaints.</li> <li>3. Support data collection and reporting requirements.</li> <li>4. Support and record communications, liaison, and notification activities ;</li> <li>5. Assist the Project team in managing operational issues and concerns; and,</li> <li>6. Work to a resolution of any concerns.</li> </ol> <p>Responses to inquiries or complaints will be coordinated and provided by Kiwetinohk in a manner appropriate to the type of inquiry, and may include:</p> <ul style="list-style-type: none"> <li>• Meetings in person</li> <li>• Telephone calls</li> <li>• Emails; or,</li> </ul>

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<p>8. Clarify whether any potential traditional land use by Indigenous peoples occurs on or near the project site and describe potential effects that the Project may have on this use, including effects on cultural and traditional practices (e.g. medicines, ceremonies, teachings, etc.), food security (e.g. hunting, gathering, subsistence farming), and spiritual practices. Recommend using a traditional land use study to gain insight into traditional land use by Indigenous peoples.</p>	<p>18, 11, 20,17, Alexis Nakota Sioux Nation</p>	<p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk.</p> <p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>BBPP environmental impact mitigation measures include:</p> <ul style="list-style-type: none"> <li>Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> <li>Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has sufficient year around volumes to support potential diversion rates with no impacts to fish or fish habitat. (See section 9.1.3. Water Supply of the Initial Project Description.)</li> </ul> <p>Detailed information on point of diversion (POD) construction via an existing access to the river and required Department of Fisheries and Oceans fish and fish habitat protection measures is also available in the Initial Project Description. It is anticipated that Alberta Environment and Protected Areas will issue an approval with restrictive conditions to ensure authorized diversion only when Freeman River has sufficient flow to support the diversion rates.</p> <p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p> <p>There are no watercourses within, or immediately adjacent to, the BBPP. As such, no impacts to fish or fish habitat within or adjacent to BBPP's boundary are anticipated.</p> <ul style="list-style-type: none"> <li>Industrial Water Run Off: Surface water runoff from the BBPP site would be collected in the storm water pond. Water meeting Alberta provincial standards for release may be released to adjoining upland areas. Water not meeting Alberta provincial</li> </ul>

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		<p>standards for release would be pumped into a truck for disposal at an approved disposal site. Site design would not allow surplus run off to enter a watercourse. Migratory bird monitoring would be implemented and deterrents used, if required.</p> <ul style="list-style-type: none"> <li>Industrial Wastewater Disposal: Industrial wastewater would be disposed of at approved wastewater disposal facilities.</li> <li>Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</li> </ul> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p> <ul style="list-style-type: none"> <li>Watercourses - Transmission Line &amp; Pipeline Impacts: <p>Transmission Line: There are no watercourse crossings associated with the transmission line. While final routing will be determined by provincial power regulators, all access would follow the most direct route deviating only to accommodate topography constraints and avoid environmental features. Therefore, there are no interactions of the transmission line with fish or fish habitat.</p> <p>Pipeline: All pipelines would be installed under watercourses using directional drilling. No disturbance to riparian vegetation, bed or banks would therefore occur. There would be no impacts to fish or fish habitat. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator (AER).</p> </li> <li>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the BBPP's environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife aversion and avoidance measures, including management of potential attractants such as garage, track observations and use best practices where conflicts with wildlife may occur.</li> </ul>

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		<p><i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act (MBCA)</i> compliance:</p> <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible.</li> </ol> <p><i>Vegetation &amp; Traditional Use:</i> The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk. Overall, the plant species identified at the BBPP are common to the area. A list of identified plant species is provided in Section 14.6.2 of the Initial Project Description. Through engagement, Kiwetinohk learned some plant species present on the proposed site are in traditional use, however, there is no evidence of their use on the proposed BBPP site. If the BBPP is approved to proceed, Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p> <p>Due to previous logging and herbicide application, Kiwetinohk is advised by an Indigenous Group that the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p><i>Traditional Land Use:</i> Kiwetinohk has not identified any traditional use of the proposed BBPP site, which is in an industrial area, has previous disturbance through logging, and may be of less value for harvesting than other areas in the region due to previous herbicide application.</p> <p>Biodiversity on the proposed BBPP site is well represented in the region and therefore development of the site is not expected to impact Indigenous traditional uses or spiritual practices.</p> <p><i>Traditional Land Use Studies:</i> Some Indigenous Groups indicated interest in the potential of traditional land use studies to help determine the effects of the BBPP on current and traditional land uses. If the BBPP is approved, Kiwetinohk would continue to engage interested Indigenous Groups with respect to the scope of a traditional use study, seeking to establish, for example, an understanding of potential study participants and terms of reference. Kiwetinohk would consider funding a proportional amount of study costs with</p>

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		other partners such as government and industry.
<b>Indigenous Peoples' Health, Social and Economic Conditions</b>		
<p>9. Provide additional information regarding potential project effects on Indigenous people's use of lands and resources for current and future economic development purposes, considering the adjacent heavy industrial land use and potential cumulative effects.</p>	13	<p>Economic impact as a result of access to resources on the BBPP site: Kiwetinohk is not aware of any existing or proposed future economic use of the proposed lands by Indigenous Groups. The BBPP lands' timber rights are currently held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be permitted to remove timber for commercial sale from the lands. The lands are Government of Alberta Crown lands and as such Indigenous Groups, individuals or companies would be required to obtain a surface lease for use of the lands for any commercial purpose. At the time of the BBPP application, no such surface lease applications had been made. Oil and gas rights are owned by various companies (depending upon the subsurface formations) and therefore there are no subsurface rights available for the BBPP lands.</p> <p>Cumulative Effects: Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible. No loss to current or future economic development opportunities has been identified.</p> <p>Economic opportunities associated with BBPP site development: If the BBPP receives approval, economic opportunities at the BBPP for Indigenous people would include training, employment and / or business contracting opportunities similar to those Kiwetinohk has created in its upstream oil and gas business in the region.</p> <p>Kiwetinohk currently supports Indigenous training, employment, contracting and other economic development, including the following:</p> <ol style="list-style-type: none"> <li>1. Indigenous operator trainee program – Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</li> <li>2. Business loans – Kiwetinohk funds small Indigenous business loans via the Indian Business Corporation with a focus on loan provision to Indigenous companies and individuals in Kiwetinohk's areas of operations. This is an ongoing program, that could benefit local Indigenous companies in the BBPP area.</li> <li>3. Participation in Economic Benefits – Kiwetinohk is committed to local Indigenous and local economic development in the region in which the BBPP will be constructed and operated. In the event Kiwetinohk contracts an EPC Contractor for construction of the BBPP, Kiwetinohk will require that the Contractor develops for Kiwetinohk approval, an Indigenous and Local Content Participation Plan which includes a plan to use local Indigenous supply and services procurement, contracting, training and employment, including having a process to ensure qualified local Indigenous and other local businesses are included on the bidders lists for any relevant scopes of work that are competitively bid to third parties.</li> <li>4. Kiwetinohk uses a prequalification tool where interested Indigenous companies can register for opportunities. Additionally, Kiwetinohk maintains an internal, community-based contractor and supplier list sorted by goods and services, which positions Kiwetinohk to ensure Indigenous providers of goods and services are identified and included in the bid process. Kiwetinohk intends to continue this approach going forward with the BBPP.</li> <li>5. When appropriate, Kiwetinohk will guide local individuals or service suppliers on pre-qualification requirements needed to</li> </ol>

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		<p>access contracting, procurement and employment opportunities relevant to the different phases of the BBPP's lifecycle.</p> <p>6. Through the BBPP's construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs, and where feasible, identify opportunities to build local skills through training and development. Kiwetinohk may suggest existing training institutions, and service providers, as well as mentorship opportunities to support skill development. (See #1 above.)</p>
<p>10. Describe potential effects of the Project on Indigenous peoples' health, including access to healthcare and emergency services. Describe mitigation measures, including plans for contingency measures in the event of accident and malfunctions scenarios, timely communication, and plans to address any unexpected emergencies that may strain existing healthcare resources.</p>	<p>18</p>	<p>Safety of workers and surrounding communities is Kiwetinohk's first priority.</p> <p>BBPP operations present no direct pathway for health impacts on neighbouring communities due to the BBPP's design and engineering to operate within provincial and federal air emissions regulations.</p> <p><i>Process and Occupational Safety at the BBPP</i></p> <p>The BBPP is designed and engineered to high process safety standards, will be operated under safety protocols by qualified personnel and equipped with emergency response equipment. Kiwetinohk will seek certification of its health, safety and environment system for the BBPP providing additional third-party verification of the BBPP's health and safety program and procedures.</p> <p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will operate using an emergency response plan that includes notification and communication with Indigenous Groups. Kiwetinohk will seek Indigenous Groups' input into its BBPP emergency response notification and communication protocols and may seek Indigenous Groups participation in emergency response drills as appropriate.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>As part of its commitment to communities, Kiwetinohk will seek to hire staff who live and work in the region, supporting the region through additional property taxes and per capital funding for important services such as health care.</p> <p>In the construction phase, Kiwetinohk will seek to reduce the impact of its construction workforce on local health services by providing emergency medical services on site, and accessing additional medical care, where possible, via STARS air ambulance. Kiwetinohk plans to engage with Indigenous Groups, health care providers, municipal representatives and other stakeholders to plan for and mitigate impacts of its construction workforce on health care, public safety, vulnerable populations, and social services.</p>
<p><b>Indigenous Peoples' Rights</b></p>		
<p>11. Describe engagement efforts that will be carried out with all Indigenous groups, including Indigenous youth,</p>	<p>18, 11</p>	<p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific</p>

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<p>who may be impacted by the Project or have interests in the project area. Provide a summary of potential issues, concerns, and/or benefits of the Project that have been expressed through Indigenous engagement efforts to date.</p>		<p>interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure, and is in keeping with the desires of Indigenous Groups reflected below.</p> <p>Depending on input from specific Indigenous Groups, engagement, communication and notification delivery methods may include:</p> <ul style="list-style-type: none"> <li>• in-person or virtual meetings with Indigenous Groups' primary engagement contact</li> <li>• in-person or virtual meetings with Indigenous Group leadership</li> <li>• in-person or virtual meetings with Métis Settlement leaderships</li> <li>• in-person, virtual meetings, or phone conversations with First Nation trappers</li> <li>• community meetings</li> <li>• Project notifications and ongoing updates of BBPP information</li> <li>• email and telephone communication</li> <li>• participation in community events to promote informal dialogue regarding BBPP</li> </ul> <p>Kiwetinohk has not undertaken specific engagement with each Indigenous Groups' youth. If the BBPP is approved, Kiwetinohk will seek to:</p> <ul style="list-style-type: none"> <li>• Work with Indigenous Group leadership to identify and communicate the needs and interests of youth to Kiwetinohk</li> <li>• Share BBPP information, including training and employment information and opportunities, with youth</li> <li>• Provide BBPP information and opportunities online, including engagement via social media</li> <li>• Assess feasibility of training programs targeted at younger people similar to Kiwetinohk's existing, Indigenous Operator Training Program</li> <li>• Receive advice from Indigenous Groups as to how best to engage with and support Indigenous youth.</li> <li>• Develop youth-focused programs - As an example of one outreach program that was developed for Indigenous youth, Kiwetinohk, in conjunction with the University of Alberta Golden Bears hockey team, is participating in a newly created program that offers Indigenous youth an opportunity to attend a Golden Bears hockey game in Edmonton and at the same time learn more about educational programs at the University of Alberta, including Indigenous student programs. The program will also provide a hockey and floor hockey coaching session on Sturgeon Lake Cree Nation, combining this with the attendance players from the University of Alberta, Golden Bears hockey team and some faculty from the University of Alberta to engage with youth about the University of Alberta programs.</li> </ul> <p><b>Summary of potential issues, concerns and / or benefits of the BBPP that have been expressed through Indigenous engagement to date include:</b></p> <ol style="list-style-type: none"> <li>1. Potential impacts on wildlife, including displacement of wildlife with specific mention of grizzly bear and moose</li> </ol>

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		<ol style="list-style-type: none"> <li>2. Loss of vegetation</li> <li>3. Impacts to streams and waterbodies, and water quality</li> <li>4. Cumulative impact on traditional lands</li> <li>5. Community health and well-being from potential pollution and noise from the proposed BBPP</li> <li>6. Preservation of sacred sites and traditional land use areas that may be affected by the project.</li> <li>7. Concerns about economic development opportunities, both current and future</li> <li>8. Increased wind and erosion</li> <li>9. Presence of environmental monitors</li> <li>10. Risk to women from non-local workforce</li> <li>11. Concern over the location of the proposed gas pipelines</li> <li>12. Concern over the location of the proposed transmission line</li> <li>13. Concern over potential carbon capture and storage</li> <li>14. Concern over the BBPP megawatt output</li> <li>15. Desire continuous engagement through life cycle of project</li> </ol> <p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>BBPP mitigation measures that address concerns 1-7 above include:</p> <ul style="list-style-type: none"> <li>• Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> <li>• Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has sufficient year around volumes to support potential diversion rates with no impacts to fish or fish habitat. (See section 9.1.3. Water Supply of the Initial Project Description.)</li> </ul> <p>Detailed information on point of diversion (POD) construction via an existing access to the river and required Department of Fisheries and Oceans fish and fish habitat protection measures is also available in the Initial Project Description. It is anticipated that Alberta Environment and Protected Areas will issue an approval with restrictive conditions to ensure</p>

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		<p>authorized diversion only when Freeman River has sufficient flow to support the diversion rates.</p> <p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p> <p>There are no watercourses within, or immediately adjacent to, the BBPP. As such, no impacts to fish or fish habitat within or adjacent to BBPP's boundary are anticipated.</p> <ul style="list-style-type: none"> <li>• Industrial Water Run Off: Surface water runoff from the BBPP site would be collected in the storm water pond. Water meeting Alberta provincial standards for release may be released to adjoining upland areas. Water not meeting Alberta provincial standards for release would be pumped into a truck for disposal at an approved disposal site. Site design would not allow surplus run off to enter a watercourse. Migratory bird monitoring would be implemented and deterrents used, if required.</li> <li>• Industrial Wastewater Disposal: Industrial wastewater would be disposed of at approved wastewater disposal facilities.</li> <li>• Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</li> </ul> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p> <ul style="list-style-type: none"> <li>• Watercourses - Transmission Line &amp; Pipeline Impacts:</li> </ul> <p>Transmission Line: There are no watercourse crossings associated with the transmission line. While final routing will be determined by provincial power regulators, all access would follow the most direct route deviating only to accommodate topography constraints and avoid environmental features. Therefore, there are no interactions of the transmission line with fish or fish habitat.</p> <p>Pipeline: All pipelines would be installed under watercourses using directional drilling. No disturbance to riparian vegetation, bed or banks would therefore occur. There would be no impacts to fish or fish habitat. Once an appropriate route for the</p>

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		<p>pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator (AER).</p> <ul style="list-style-type: none"> <li>• Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta’s regulatory requirements to support the BBPP’s environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife aversion and avoidance measures, including management of potential attractants such as garbage, track observations and use best practices where conflicts with wildlife may occur. Kiwetinohk is an established oil and gas operator in the region and has established attractant management, bear awareness and bear safety programs, which would be extended and, where necessary, customized for the BBPP. To date, Kiwetinohk upstream oil and gas personnel have observed grizzly bears present in their operating area, and have not had bear encounters, bear mortality or bear habituation or relocations.</li> <li>• <i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance: <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible.</li> </ol> </li> </ul> <p>Vegetation &amp; Traditional Use: The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk. Overall, the plant species identified at the BBPP are common to the area. A list of identified plant species is provided in Section 14.6.2 of the Initial Project Description. Through engagement, Kiwetinohk learned some plant species present on the proposed site are in traditional use, however, there is no evidence of their use on the proposed BBPP site. If the BBPP is approved to proceed, Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p>

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		<p>Due to previous logging and herbicide application, Kiwetinohk was advised by an Indigenous Group the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which is in an industrial area, has previous disturbance through logging, and may be of less value for harvesting than other areas in the region due to previous herbicide application.</p> <p>Biodiversity on the proposed BBPP site is well represented in the region and therefore development of the site is not expected to impact Indigenous traditional uses or spiritual practices.</p> <p>Traditional Land Use Studies: Some Indigenous Groups indicated interest in the potential of traditional land use studies to help determine the effects of the BBPP on current and traditional land uses. If the BBPP is approved, Kiwetinohk would continue to engage interested Indigenous Groups with respect to the scope of a traditional use study, seeking to establish, for example, an understanding of potential study participants and terms of reference. Kiwetinohk would consider funding a proportional amount of study costs with other partners such as government and industry.</p> <p>Cumulative Effects: Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible.</p> <p><i>Noise</i></p> <p>The BBPP is located in an existing heavy industrial area with no residences located in the vicinity of the BBPP site. Noise modelling was completed using the highest noise levels associated with the operating facility, therefore, modelling assumes the highest possible levels at all times. As the BBPP operates and different equipment operates as required, any noise emissions would not exceed the permissible sound levels.</p> <p>Noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to wildlife and migratory birds. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</p> <p>To avoid conflict and complaints, Kiwetinohk would seek engagement with area Indigenous Groups on emergency response and / or emergency notifications, wildlife and environmental reporting, and seek to coordinate maintenance and operations scheduling to avoid specific events or times identified, and to obtain input to its Compliant Resolution Plan (CRP).</p> <p>The CRP will include Kiwetinohk's procedures for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p>

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		<p>The CRP would include:</p> <ul style="list-style-type: none"> <li>• Creating an accessible online portal to receive information from individuals or groups who have questions about the BBPP or have concerns.</li> <li>• Manage concerns and complaints openly, promptly and fulsomely.</li> <li>• Investigating the cause of complaints and take actions, if needed, to correct the problem.</li> <li>• Resolve concerns and complaints in a timely fashion; and</li> <li>• Learn from past experiences, maintain diligence in its ongoing operations and reduce impacts of the BBPP on the community.</li> </ul> <p>The CRP would:</p> <ol style="list-style-type: none"> <li>1. Record inquiries, comments, and complaints.</li> <li>2. Manage and record responses to inquiries, comments, and complaints.</li> <li>3. Support data collection and reporting requirements.</li> <li>4. Support and record communications, liaison, and notification activities ;</li> <li>5. Assist the Project team in managing operational issues and concerns; and,</li> <li>6. Work to a resolution of any concerns.</li> </ol> <p>Responses to inquiries or complaints will be coordinated and provided by Kiwetinohk in a manner appropriate to the type of inquiry, and may include:</p> <ul style="list-style-type: none"> <li>• Meetings in person.</li> <li>• Telephone calls.</li> <li>• Emails; or,</li> <li>• Letters.</li> </ul> <p>Concerns about economic development opportunities, both current and future:</p> <ul style="list-style-type: none"> <li>• <i>Loss of access to resources on the BBPP site</i> – Kiwetinohk is not aware of any existing or proposed future economic use of the proposed lands by Indigenous Groups. The BBPP lands’ timber rights are currently held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be permitted to remove timber for commercial sale from the lands. The lands are Government of Alberta Crown lands and as such Indigenous Groups, individuals or companies would be required to obtain a surface lease for use of the lands for any commercial purpose. At the time of the BBPP application, no such surface lease applications had been made. Oil and gas rights are owned by various companies (depending upon the subsurface formations) and therefore there are no subsurface rights available for the BBPP lands. The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk.</li> <li>• <i>Opportunities associated with site development</i> – If the BBPP receives approval, economic opportunities at the BBPP for Indigenous people would include training, employment and / or business contracting opportunities similar to those Kiwetinohk has</li> </ul>

Issues	Registry Comment Number	Response
		<p>created in its upstream oil and gas business in the region.</p> <p>Kiwetinohk currently supports Indigenous training, employment, contracting and other economic development, including the following:</p> <ol style="list-style-type: none"> <li>1. Indigenous operator trainee program – Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</li> <li>2. Business loans – Kiwetinohk funds small Indigenous business loans via the Indian Business Corporation with a focus on loan provision to Indigenous companies and individuals in Kiwetinohk's areas of operations. This is an ongoing program, that could benefit local indigenous companies in the BBPP area.</li> <li>3. Participation in Economic Benefits – Kiwetinohk is committed to local Indigenous and local economic development in the region in which the BBPP will be constructed and operated. In the event Kiwetinohk contracts an EPC Contractor for construction of the BBPP, Kiwetinohk will require that the Contractor develops for Kiwetinohk approval, an Indigenous and Local Content Participation Plan which includes a plan to use local Indigenous supply and services procurement, contracting, training and employment, including having a process to ensure qualified local Indigenous and other local businesses are included on the bidders lists for any relevant scopes of work that are competitively bid to third parties.</li> <li>4. Kiwetinohk uses a prequalification tool where interested Indigenous companies can register for opportunities. Additionally, Kiwetinohk maintains an internal, community-based contractor and supplier list sorted by goods and services, which positions Kiwetinohk to ensure Indigenous providers of goods and services are identified and included in the bid process. Kiwetinohk intends to continue this approach going forward with the BBPP.</li> <li>5. When appropriate, Kiwetinohk will guide local individuals or service suppliers on pre-qualification requirements needed to access contracting, procurement and employment opportunities relevant to the different phases of the BBPP's lifecycle.</li> <li>6. Through the BBPP's construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs, and where feasible, identify opportunities to build local skills through training and development. Kiwetinohk may suggest existing training institutions, and service providers, as well as mentorship opportunities to support skill development. (See #1 above.)</li> </ol> <p><i>Health and Safety</i></p> <p>Safety of workers and surrounding communities is Kiwetinohk's first priority.</p> <p>BBPP operations present no direct pathway for health impacts on neighbouring communities due to the BBPP's design and engineering to operate within provincial and federal air emissions regulations.</p> <p><i>Process and Occupational Safety at the BBPP</i></p> <p>The BBPP is designed and engineered to high process safety standards, will be operated under safety protocols by qualified personnel and equipped with emergency response equipment. Kiwetinohk will seek certification of its health, safety and environment</p>

Issues	Registry Comment Number	Response
		<p>system for the BBPP providing additional third-party verification of the BBPP’s health and safety program and procedures.</p> <p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will operate using an emergency response plan that includes notification and communication with Indigenous Groups. Kiwetinohk will seek Indigenous Groups’ input into its BBPP emergency response notification and communication protocols and may seek Indigenous Groups participation in emergency response drills as appropriate.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>As part of its commitment to communities, Kiwetinohk will seek to hire staff who live and work in the region, supporting the region through additional property taxes and per capital funding for important services such as health care.</p> <p>In the construction phase, Kiwetinohk will seek to reduce the impact of its construction workforce on local health services by providing emergency medical services on site, and accessing additional medical care, where possible, via STARS air ambulance. Kiwetinohk plans to engage with Indigenous Groups, health care providers, municipal representatives and other stakeholders to plan for and mitigate impacts of its construction workforce on health care, public safety, vulnerable populations, and social services.</p> <p><i>Cultural Heritage</i></p> <p>Currently, there are no identified sites or structures of historical, archaeological, paleontological, or architectural significance in the BBPP area.</p> <p>The identification of sites and potential risk to historical resources is first searched through the “Alberta Listing of Historic Resources” (the ‘Listing’). The Listing is a tool that developers, industry representatives, and regulators may use to help determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> <li>• Archaeological sites</li> <li>• Paleontological sites</li> <li>• Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.)</li> <li>• Historic structures</li> </ul> <p>The HRV listing provides proponents with advance notification of possible historic resource concerns and may be used as a tool for project planning. Used in conjunction with the Instructions for Use of the Listing and/or a relevant <u>Land Use Procedures Bulletin</u>, the Listing helps to determine if a proposed development needs approval under the Culture, Multiculturalism and Status of Women’s (CMSW) Historic Resources Management Branch’s (HRMB) <i>Historical Resources Act</i> approval process. The Listing indicates the Historic Resource Value (HRV), if any, that has been assigned to lands in the project area, and the Instructions for Use and the procedures bulletins explain the required action. In many cases, the required action is to submit a Historic Resources Application</p>

Issues	Registry Comment Number	Response
		<p>through the <u>Online Permitting and Clearance (OPaC) system</u>.<sup>1</sup></p> <p>In addition, Alberta's Aboriginal Consultation office's (ACO) consultation requirements are independent of CMSW's, HRMB <i>Historical Resources Act</i> approval process. If a project area includes HRV 4c site(s), the ACO will inform proponents and direct them to contact CMSW.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure, including protocols on discovery of items of historical, archaeological, paleontological, or architectural significance.</p> <p><i>Increased Wind and Erosion, Concern 8</i></p> <p>The BBPP is located in an area where there is a lack of watercourses and significant slopes. Due to this location, it is anticipated that erosion potential for the BBPP will be limited to the site. Kiwetinohk will take erosion control measures including use of vegetation and matting as required. Additionally, Kiwetinohk intends to use dust suppression measures.</p> <p><i>Presence of Environmental Monitors, Concern 9</i></p> <p>Some Indigenous Groups indicated they would like to have environmental monitors present. Kiwetinohk will have various levels of environmental monitoring during the different phases of the BBPP lifecycle. Along with pre-disturbance assessments and consultation, during construction, environmental monitors will be present to monitor soil and vegetation salvage/storage, and continuous wildlife monitoring with special consideration to restricted access periods. During BBPP operation, based on final project approval, Kiwetinohk will be subject to a strict daily, monthly and yearly monitoring schedule which includes air monitoring and membership to the West Central Airshed Society, industrial wastewater, waste management, land conservation (topsoil conservation), groundwater monitoring, soil monitoring and a site decommissioning and land reclamation plan for post operation shut-down and restoration.</p> <p><i>Risk to Women, Concern 10</i></p> <p>Women represent approximately 51% of Canada's population and 48% of its workforce but only about 27% of Canada's electricity generation workforce. Women comprise about 13% of Canada's construction workforce. Energy and construction jobs are well paid, with workers earning higher incomes than Canadian and provincial averages.</p>

<sup>1</sup> Listing of Historic Resources. 2019. <https://www.alberta.ca/listing-historic-resources.aspx>

Issues	Registry Comment Number	Response
		<p>For its construction phase, Kiwetinohk expects the majority of construction work will be completed using a mobile construction workforce consisting of approximately 85- 90% men who would be living temporarily in the vicinity of the BBPP site in area hotels, short term accommodations and / or workers camp environments. A largely male mobile workforce increases risk of violence to women living in the region and increases opportunity for human trafficking of women. Research indicates the risks are increased for Indigenous women and younger women in the food service or hospitality industries who may be exposed to workers.</p> <p>Kiwetinohk will work collaboratively with Indigenous Groups, non-governmental organizations, local communities and its contractors to develop strategies and plans to reduce risks to women and other potential populations, including identification of specific groups, and risk factors and will develop options and programs to mitigate risk, including:</p> <ul style="list-style-type: none"> <li>• Engagement with local communities and Indigenous Groups to build awareness of risks and develop workforce management plans to reduce interaction between vulnerable and potentially at-risk populations and mobile workers. This includes worker transportation and accommodation planning, monitoring initiatives and reporting mechanisms.</li> <li>• Education and training of mobile workers to understand the history of colonialism and gender impacts, impacts and risks Indigenous women face today, and to identify victims of violence and / or human trafficking, resources, and reporting mechanisms. A survivor-informed customized program could be created and delivered in collaboration with community partners and construction contractors.</li> <li>• Increase awareness of and access to resources for women experiencing violence, trafficking or at risk via partnerships with established culturally appropriate experts and providers.</li> <li>• Create skill development and economic opportunities for local women as construction workers or contractors to provide economic opportunities, benefits and to improve gender diversity on the project work site.</li> <li>• Work with contractors to increase the number of women, particularly local Indigenous women, represented in the workforce to support economic inclusion.</li> <li>• Instill and enforce zero tolerance policy for harassment and violence in the workplace, including accommodations and catering providers.</li> <li>• Increase construction supervision and project ownership presence in camps, accommodation areas and communities where mobile workers are present.</li> </ul> <p>Monitoring and feedback on socio-economic impacts is important so Kiwetinohk can work with communities and construction contractors to reduce risk and increase benefits for women.</p> <p>In the operational phase, Kiwetinohk anticipates the majority of its workforce will be local. Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</p>

Issues	Registry Comment Number	Response
		<p><i>Location of the Proposed Gas Pipelines, Concern 11</i></p> <p>Indigenous Groups would like to understand which of two potential routes would be utilized for the BBPP. At this time no decision has been made respecting the routing. To fuel the BBPP, natural gas will be supplied from a new dedicated pipeline. The new pipeline will connect to an existing underground gas pipeline approximately 3.8 km northeast of the Project at LSD 3, Section 25, Township 64, Range 11, West of the 5th Meridian (03-25-064-11 W5M). Two potential routes, intended to follow existing disturbances where practical, are under consideration. Only one will be built. A separate application will need to be made to the AER for the route selected. Please see Section 9.1.2 of the Initial Project Description document for more information. This map is Figure 2 of Appendix B to the Initial Project Description. Kiwetinohk will engage with interested Indigenous Groups at such time as an application is made to the AER.</p> <p><i>Location of Proposed Powerline, Concern 12</i></p> <p>Three alternate routes have been identified. An existing 240kV HV transmission line is located approximately 600m west of the proposed BBPP and the point of interconnect for the BBPP is expected to be at 05-15-064-11 W5M. Three potential transmission line route options were selected by ATCO, who is managing the interconnection permitting, however only the preferred route will be constructed. ATCO will select the preferred route and manage the permitting through the AESO and AUC process. This map is Figure 3 of Appendix B to the Initial Project Description. Please see Section 9.1.4 of the Initial Project Description document for more information.</p> <p><i>Carbon Capture and Storage, Concern 13</i></p> <p>Development and implementation of carbon capture and / or storage at or near the BBPP would be subject to a separate regulatory process and timing of any such proposal would depend on wide range of factors including technology commercialization, economics, continued policy and regulatory development, and Indigenous and stakeholder support.</p> <p><i>BBPP megawatt (MW) output, Concern 14</i></p> <p>There is a concern that the size of the BBPP is over 200 MW. The 200 MW size is not regulatory limit restricting the size of natural gas power plant that can be constructed and operated in Canada. The 200 MW is the size at which a project is required go through the federal Impact Assessment Agency of Canada's (IAAC) process. (See <a href="https://www.gazette.gc.ca/rp-pr/p2/2019/2019-08-21/html/sor-dors285-eng.html">https://www.gazette.gc.ca/rp-pr/p2/2019/2019-08-21/html/sor-dors285-eng.html</a>)</p>

Issues	Registry Comment Number	Response
		<p>The BBPP is designed to have a maximum production capacity of 460 MW and is therefore subject to IAAC review. Kiwetinohk submitted an Initial Project Description and Initial Project Description Summary to IAAC as part of the federal process to inform the decision as to whether a federal environmental impact assessment is required.</p> <p>Examples of larger natural gas-fueled power plants in the province include the Shepard Energy Centre, an 860 MW natural gas-fueled power plant located just east of Calgary and operated by ENMAX Energy Production, as well as the Cascade Power Project, which is a 900 MW natural gas-fueled power plant located 12 km southwest of the town of Edson, Alberta.</p> <p>The BBPP differs from these other facilities mentioned as the BBPP will incorporate an air-cooled condenser rather than a water-cooled surface condenser for the steam turbine, which greatly reduces the water usage and mitigates the need for both a large reliable source with availability year-round, and a large storage pond.</p> <p>Kiwetinohk anticipates that on a per megawatt water use and carbon dioxide emissions efficiency basis, the BBPP, if built as engineered, will be one of the most efficient natural gas-fired power generation facilities in Alberta and will produce electricity that is lower in emissions than the Alberta average today (using the 2023 emissions grid displacement factor).</p>
<p>12. Describe potential impacts of the Project on the rights of the Indigenous peoples of Canada, as recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>, and proposed mitigation measures to address these impacts. Include a summary of key issues or concern and any issues that relate to the adverse impact that the designated project may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>.</p>	<p>9</p>	<p>Summary of potential issues, concerns and / or benefits of the BBPP expressed through Indigenous engagement to date are summarized in the response to Issue 11 above.</p> <p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than a non-negligible impact on traditional use of resources in the area.</p>
<p>13. Describe potential project impacts on Indigenous navigation and the associated exercise of rights as a result of the water intake on the Freeman River.</p>	<p>9</p>	<p>The water intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p>

Issues	Registry Comment Number	Response
<b>Indigenous Peoples' Physical and Cultural Heritage and any Structure, Site, or Thing of Historical, Archaeological, Paleontological, or Architectural Significance</b>		
<p>14. Describe potential project effects on Indigenous peoples' spiritual, physical, and cultural heritage, including sites of archaeological and paleontological significance, considering the cumulative effects of other industrial land uses in the project area. Describe mitigation measures that will be implemented to address these effects.</p>	<p>11, 17, Alexis Nakota Sioux Nation</p>	<p>The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk. Overall, the plant species identified at the BBPP are common to the area. A list of identified plant species is provided in Section 14.6.2 of the Initial Project Description. Through engagement, Kiwetinohk learned some plant species present on the proposed site are in traditional use, however, there is no evidence of their use on the proposed BBPP site. If the BBPP is approved to proceed, Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p> <p>Due to previous logging and herbicide application, Kiwetinohk is advised by an Indigenous Group that the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible.</p> <p>Currently, there are no identified sites or structures of historical, archaeological, paleontological, or architectural significance in the BBPP area.</p> <p>The identification of sites and potential risk to historical resources is first searched through the "Alberta Listing of Historic Resources" (the 'Listing'). The Listing is a tool that developers, industry representatives, and regulators may use to help determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> <li>• Archaeological sites</li> <li>• Paleontological sites</li> <li>• Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.)</li> <li>• Historic structures</li> </ul> <p>The HRV listing provides proponents with advance notification of possible historic resource concerns and may be used as a tool for project planning. Used in conjunction with the Instructions for Use of the Listing and/or a relevant <u>Land Use Procedures Bulletin</u>, the Listing helps to determine if a proposed development needs approval under the Culture, Multiculturalism and Status of Women's (CMSW) Historic Resources Management Branch's (HRMB) <i>Historical Resources Act</i> approval process. The Listing indicates the Historic Resource Value (HRV), if any, that has been assigned to lands in the project area, and the Instructions for Use and the procedures bulletins explain the required action. In many cases, the required action is to submit a Historic Resources Application through the <u>Online Permitting and Clearance (OPaC) system</u>.<sup>2</sup></p> <p>In addition, the ACO's consultation requirements are independent of CMSW's, HRMB <i>Historical Resources Act</i> approval process. If a project area includes HRV 4c site(s), the ACO will inform proponents and direct them to contact CMSW.</p>

<sup>2</sup> Listing of Historic Resources. 2019. <https://www.alberta.ca/listing-historic-resources.aspx>

Issues	Registry Comment Number	Response
<b>Other Factors that IAAC Considers Relevant</b>		
15. Clarify when carbon capture and storage technology will be operational in relation to the Project's proposed timelines.	16	<p>To ensure compliance with the proposed federal Clean Electricity Regulations (CER), which will strictly limit greenhouse gas emissions from natural gas-fired power generation facilities starting in 2035, Kiwetinohk has designed the BBPP to accommodate carbon capture equipment and facilities. The Black Bear Carbon Hub, which Kiwetinohk is in the early stages of evaluating, is a potential option for deep geological storage of the carbon dioxide captured at the BBPP. Given that any carbon dioxide captured at the BBPP must either be safely stored or used, installation of carbon capture equipment at the BBPP depends on determination of safe and economic carbon dioxide storage and use options.</p> <p>Kiwetinohk expects to make a decision on whether or not to advance carbon capture and storage at the BBPP between approval of the BBPP and 2035, given that CER greenhouse gas emissions limits begin in 2035. The power industry expects rapid advancements in carbon capture technology over the next ten years so the timing of a final investment decision to proceed with construction and operation of carbon capture facilities at the BBPP remains subject to ongoing technology evaluation, technology commercialization, economics, continued regulatory development, carbon credit prices, Indigenous and stakeholder support, and development of a safe deep geological carbon dioxide storage hub. Or, as an alternative to the Black Bear Carbon Hub, Kiwetinohk may develop other carbon dioxide offtake arrangements, such as transportation of carbon dioxide elsewhere for storage or use.</p>
16. Provide additional details on the carbon capture and storage hub, including ownership, the proposed location, construction timing, what the potential effects within federal jurisdiction may be, longevity of storage, whether the hub would be constructed if the Project did not proceed, and any applicable provincial and federal regulatory mechanisms. Discuss any additional pipelines that may be required for the Project with and without the hub, including length and routing options.	18, 17, IAAC	<p>To ensure compliance with the proposed federal Clean Electricity Regulations (CER), which will strictly limit greenhouse gas emissions from natural gas-fired power generation facilities starting in 2035, Kiwetinohk has designed the BBPP to accommodate carbon capture equipment and facilities. The Black Bear Carbon Hub, which Kiwetinohk is in the early stages of evaluating, is a potential option for deep geological storage of the carbon dioxide captured at the BBPP. Given that any carbon dioxide captured at the BBPP must either be safely stored or used, installation of carbon capture equipment at the BBPP depends on determination of safe and economic carbon dioxide storage and use options.</p> <p>Kiwetinohk expects to make a decision on whether or not to advance carbon capture and storage at the BBPP between approval of the BBPP and 2035, given that CER greenhouse gas emissions limits begin in 2035. The power industry expects rapid advancements in carbon capture technology over the next ten years so the timing of a final investment decision to proceed with construction and operation of carbon capture facilities at the BBPP remains subject to ongoing technology evaluation, technology commercialization, economics, continued regulatory development, carbon credit prices, Indigenous and stakeholder support, and development of a safe deep geological carbon dioxide storage hub. Or, as an alternative to the Black Bear Carbon Hub, Kiwetinohk may develop other carbon dioxide offtake arrangements, such as transportation of carbon dioxide elsewhere for storage or use.</p> <p>The Intergovernmental Panel on Climate Change says that carbon dioxide stored in geological reservoirs is likely to remain there for over 100 years, and very likely to remain for over 1,000 years. If it proceeds, the Black Bear Carbon Hub would be required to develop and implement a rigorous and scientific measurement, monitoring and verification (MMV) program. Measurement and monitoring of the injection facilities, sequestration site and surrounding environment must provide assurance that carbon dioxide is contained to the</p>

Issues	Registry Comment Number	Response
		<p>sub-surface sequestration complex. Government of Alberta regulations specify the requirements for MMV programs.</p> <p>Given that a final investment decision to proceed with construction and operation of carbon capture facilities at BBPP must be made in concert with either the Black Bear Carbon Hub or an alternative carbon dioxide offtake option, carbon capture equipment and materials (including the amine used to strip the carbon dioxide from flue gas) will not be present at the BBPP site until a decision on both capture and storage/use aspects is taken some time between BBPP approval and 2035, assuming the CER or other emissions limiting legislation is finalized by the Government of Canada and / or carbon pricing makes carbon capture and storage economically more attractive than emitting.</p> <p>Once a final investment decision is taken, construction is completed and operation of carbon capture facilities has commenced, amine or other chemicals stored or handled at the BBPP site will be done in accordance with process and occupational safety requirements, environmental regulations and best practices.</p> <p>Kiwetinohk takes a lifecycle approach to regulatory planning across carbon sequestration site selection, initial application and permitting, pre-injection, injection and operations, closure, and post-closure.</p> <p>As the BBPP would be the anchor client (providing approximately 65% of total carbon dioxide supply) for the Black Bear Carbon Storage Hub, if the BBPP does not proceed, the Black Bear Carbon Storage Hub is unlikely to proceed.</p> <p>At this early stage, Black Bear Carbon Hub economics and potential locations for carbon dioxide infrastructure, injection and monitoring sites are unknown and require further assessment.</p> <p>Given that it remains early in the assessment of the Black Bear Carbon Hub, Kiwetinohk cannot speculate on required pipelines if the Black Bear Carbon Hub proceeds, or if it does not proceed and carbon dioxide captured at the BBPP must be transported for storage or use elsewhere.</p> <p>At this time, Kiwetinohk cannot speculate on ownership structure of carbon capture facilities at the BBPP, or the ownership structure of any pipelines, storage or the Black Bear Carbon Hub.</p> <p>The application for the BBPP includes carbon capture facilities. As such, the potential effects within federal jurisdiction are captured as part of BBPP provincial and federal regulatory applications.</p> <p>If the Black Bear Carbon Hub proceeds, it would be subject to a separate Alberta provincial regulatory process, including engagement with Indigenous groups. The Black Bear Carbon Hub will be planned, developed, and operated in compliance with Alberta's <i>Mines and Minerals Act</i>, the <i>Oil and Gas Conservation Act</i>, the <i>Water Act</i>, and all associated Alberta Energy Regulator (AER) Directives applicable to carbon dioxide capture, pipeline transportation, drilling, completions, injection, measurement, monitoring and verification, closure, open access, stakeholder engagement, emergency response planning, and reclamation.</p>

Issues	Registry Comment Number	Response
<p>17. Provide details of how the carbon capture and storage system, and associated substances, will be stored and maintained during extended periods when it is not operating, such as during initial station operation if a viable hub has not been identified, or when the hub is undergoing maintenance or is otherwise unavailable for use.</p>	<p>12</p>	<p>Given that a final investment decision to proceed with construction and operation of carbon capture facilities at BBPP must be made in concert with either the Black Bear Carbon Hub or an alternative carbon dioxide offtake option, carbon capture equipment and materials (including the amine used to strip the carbon dioxide from flue gas) will not be present at the BBPP site until a decision on both capture and storage/use aspects is taken some time between BBPP approval and 2035, assuming the CER or other emissions limiting legislation is finalized by the Government of Canada and / or carbon pricing makes carbon capture and storage economically more attractive than emitting.</p> <p>Once a final investment decision is taken, construction is completed and operation of carbon capture facilities has commenced, amine or other chemicals stored or handled at the BBPP site will be done in accordance with process and occupational safety requirements, environmental regulations and best practices.</p>

## Table II – Other Comments, Advice, and Recommendations

The Impact Assessment Agency of Canada (IAAC) is providing the following table for consideration by Kiwetinohk Energy Corp. (the Proponent). The table includes other comments, advice, and recommendations received from participants on the summary of the Initial Project Description. The issues identified below may relate to areas of federal jurisdiction, however, IAAC is of the view that they are not necessary to inform its determination on whether an impact assessment is required at this time. The issues below will be considered should an impact assessment be required. The Proponent can respond to the following comments as part of its response to the Summary of Issues (Table I) noting that any responses may support the tailoring of the Impact Statement Guidelines and other Planning phase documents, as appropriate. IAAC encourages the Proponent to review and consider all original participant comments available online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 88747).

Issues	Registry Comment Number	Response												
<b>Accidents and Malfunctions</b>														
18. Clarify on the potential accident and malfunction scenarios that could lead to the release of contaminants into the surrounding environment for each phase of the Project. Describe potential effects that may occur and proposed mitigation measures to address these effects.	18, 12	<p>Kiwetinohk’s Core Emergency Response Plan (CERP) identifies, defines and advises actions for dealing with facility incidents. Due to the size of the plan, only the table of contents is provided for reference (Appendix I – Emergency Response Plan of the Industrial Approval application). The full plan can be provided upon request.</p> <p>The CERP includes a Crisis Communication Plan for notifications within Kiwetinohk’s emergency planning zone, including Indigenous Groups.</p> <p>Safety and environmental risks during construction and operations, and mitigations, include:</p> <table border="1" data-bbox="930 902 2179 1442"> <thead> <tr> <th data-bbox="930 902 1228 971">Risk / Effects</th> <th data-bbox="1228 902 1776 971">Mitigation</th> <th data-bbox="1776 902 2179 971">Project Phase</th> </tr> </thead> <tbody> <tr> <td data-bbox="930 971 1228 1127">Erosion <ul style="list-style-type: none"> <li>Sediment into the watercourse</li> </ul> </td> <td data-bbox="1228 971 1776 1127"> <ul style="list-style-type: none"> <li>Geotechnical assessment</li> <li>Matting</li> <li>Vegetation</li> </ul> </td> <td data-bbox="1776 971 2179 1127"> <ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul> </td> </tr> <tr> <td data-bbox="930 1127 1228 1256">Spills <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> </ul> </td> <td data-bbox="1228 1127 1776 1256"> <ul style="list-style-type: none"> <li>Spill prevention</li> <li>Secondary containment</li> <li>Spill monitoring</li> <li>Spill response plan</li> </ul> </td> <td data-bbox="1776 1127 2179 1256"> <ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul> </td> </tr> <tr> <td data-bbox="930 1256 1228 1442">Natural gas release (e.g. pipeline rupture) <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> </ul> </td> <td data-bbox="1228 1256 1776 1442"> <ul style="list-style-type: none"> <li>Ground disturbance code of practice</li> <li>Emergency response plan</li> <li>Air monitoring</li> </ul> </td> <td data-bbox="1776 1256 2179 1442"> <ul style="list-style-type: none"> <li>Operations</li> </ul> </td> </tr> </tbody> </table>	Risk / Effects	Mitigation	Project Phase	Erosion <ul style="list-style-type: none"> <li>Sediment into the watercourse</li> </ul>	<ul style="list-style-type: none"> <li>Geotechnical assessment</li> <li>Matting</li> <li>Vegetation</li> </ul>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul>	Spills <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> </ul>	<ul style="list-style-type: none"> <li>Spill prevention</li> <li>Secondary containment</li> <li>Spill monitoring</li> <li>Spill response plan</li> </ul>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul>	Natural gas release (e.g. pipeline rupture) <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> </ul>	<ul style="list-style-type: none"> <li>Ground disturbance code of practice</li> <li>Emergency response plan</li> <li>Air monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Operations</li> </ul>
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		<ul style="list-style-type: none"> <li>Human health</li> </ul>			
		Fire <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> <li>Human health</li> </ul>	<ul style="list-style-type: none"> <li>Air monitoring</li> <li>Emergency response plan</li> <li>Fire suppression equipment</li> </ul>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul>	
		Motor vehicle accidents <ul style="list-style-type: none"> <li>Contamination of soil, water, air</li> <li>Human health</li> </ul>	<ul style="list-style-type: none"> <li>Emergency response plan</li> </ul>	<ul style="list-style-type: none"> <li>Construction</li> <li>Operation</li> <li>End of life</li> </ul>	
<b>Acoustic Environment</b>					
19. The Alberta Utilities Commission noted that the Proponent will be required to comply with Rule 012: Noise Control, which would require the implementation of noise mitigation measures and sound level surveys following construction.	6	Sound level surveys would be conducted in the event of a complaint. AUC Rule 012 indicates that construction noise must be managed in the event of nearby residents. Nevertheless, if a complaint is filed during construction, Kiwetinohk must respond expeditiously and take prompt action to address the complaint. (AUC Rule 012, Section 2.11 Construction Noise).			
20. Recommend that the noise impact assessment for the Project be delineated by project phase and take into consideration seasonal use of the land by Indigenous groups.	20, 17	<p>Noise modelling was completed using the highest noise levels associated with the operating facility, therefore, modelling assumes the highest possible levels at all times. As the BBPP operates and different equipment operates as required, any noise emissions would not exceed the permissible sound levels.</p> <p>Noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to wildlife and migratory birds. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</p> <p>To avoid conflict and complaints, Kiwetinohk would seek engagement with area Indigenous Groups on emergency response and / or emergency notifications, wildlife and environmental reporting, and seek to coordinate maintenance and operations scheduling to avoid specific events or times identified, and to obtain input to its Compliant Resolution Plan (CRP).</p> <p>The CRP will include Kiwetinohk's procedures for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP would include:</p> <ul style="list-style-type: none"> <li>Creating an accessible online portal to receive information from individuals or groups who have questions about the BBPP or have concerns.</li> </ul>			

Issues	Registry Comment Number	Response
		<ul style="list-style-type: none"> <li>• Manage concerns and complaints openly, promptly and fulsomely.</li> <li>• Investigating the cause of complaints and take actions, if needed, to correct the problem.</li> <li>• Resolve concerns and complaints in a timely fashion; and</li> <li>• Learn from past experiences, maintain diligence in its ongoing operations and reduce impacts of the BBPP on the community.</li> </ul> <p>The CRP would:</p> <ol style="list-style-type: none"> <li>1. Record inquiries, comments, and complaints.</li> <li>2. Manage and record responses to inquiries, comments, and complaints.</li> <li>3. Support data collection and reporting requirements.</li> <li>4. Support and record communications, liaison, and notification activities;</li> <li>5. Assist the Project team in managing operational issues and concerns; and,</li> <li>6. Work to a resolution of any concerns.</li> </ol> <p>Responses to inquiries or complaints will be coordinated and provided by Kiwetinohk in a manner appropriate to the type of inquiry, and may include:</p> <ul style="list-style-type: none"> <li>• Meetings in person.</li> <li>• Telephone calls.</li> <li>• Emails; or,</li> <li>• Letters.</li> </ul> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.</p>
<b>Alternative Means of Carrying Out the Project</b>		
21. Consider the use of alternative and more environmentally friendly energy sources to supply fuel for the Project.	7, 21	<p>Kiwetinohk has not identified any potential alternatives to the BBPP that are technically or economically feasible. The BBPP is a standalone project to provide electricity to the Alberta Interconnected Electric System. Capacity access at the electrical grid is the single largest limiting factor to the location and power output design of the Project. In addition, the BBPP requires both land access to the source gas, and an adequate supply of source gas, to provide energy inputs to the facility.</p> <p>To supply the stated power 400MW to the electrical grid a number of additional alternatives the BBPP have been considered but are not feasible for the reasons as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Wind Power:</b> Although turbine sizes and outputs vary, assuming a typical turbine energy output of 4 MW, would require approximately 100 wind turbines to supply the necessary energy. Assuming a 1 hectare x 1 hectare turbine footprint, the</li> </ol>

Issues	Registry Comment Number	Response
		<p>resulting surface disturbance from the turbines would be 100 hectares. Additionally, setbacks between turbines due to wake loss and turbulence from blades while they are in operation. Generally, a five (5) times rotor diameter setback distance may be required in the prevailing wind direction between turbines, and a minimum three (3) times rotor diameter setback distance may be required perpendicular to the prevailing wind direction between turbines to limit effects of wake loss and turbulence. Assuming a 100-metre rotor diameter, this would place the distance between turbines at 500m. For connection of roads and underground or overhead collector lines, this would increase the level of disturbance by an additional 100 hectares (500 m of road x 20 m wide x 100 turbines). Thus, the total disturbance for a wind project of a comparable size is approximately 200 hectares, which is 150 hectares larger than the current disturbance. More importantly, an appropriate wind resource to make the Project economically viable is required. Turbine locations are selected based on the wind resource that is specific to the Project lands from validated wind measurements. The collection of site-specific data for wind speed and direction are crucial to determining site potential. Wind resource mapping and data from meteorological towers would be required over multiple years to identify optimal wind resource areas within the original land base. This would allow for effective placement of the turbines to maximize power generation from the wind resource for the Project based upon expected energy outputs within the modeled wind resource.</p> <p>2. <b>Solar Power:</b> Similar to wind power projects, a number of factors need to be considered for a successful solar project. These include an appropriate solar regime to make the Project economically viable, the presence of adequate land base for placement of solar panels and associated infrastructure; relatively level topography with minimal existing right-of-ways and easements; and the ability to place solar panels to meet regulatory setbacks. Using a recent solar project approved by the AUC in Alberta (Brooks Solar II Project, AUC Decision #: 24573-D01-2020), the Brooks Solar II project required 96 hectares of land to generate 36 MW of Direct Current (DC) energy. Using this estimated land base, the BBPP would then require 1,066 hectares of land. In this region, all land is forested and would therefore require extensive clearing for infrastructure placement.</p> <p>The most significant constraint to the alternative use of wind or solar power in this area is the regulatory environment. Currently, Alberta does not have regulations that allow renewable energy to be permitted on Crown Land. As the BBPP is located on Crown Land, and is only surrounded by Crown Land, there is no regulatory mechanism to support renewable energy alternatives to the BBPP in this operating region.</p> <p>3. <b>Nuclear Power:</b> Currently there are no active nuclear power plants in Alberta. The regulatory and financial uncertainty, in addition to the technical expertise requirements, are outside the scope and function of Kiwetinohk and this is not a feasible option for Kiwetinohk.</p>
22. Request that additional information be provided regarding the emissions intensity of facilities that utilize similar technologies as the Project to verify the emissions intensity predicted for the Project.	16	<p>The primary substance of concern from the BBPP is NO<sub>x</sub> from the combustion of natural gas. Secondary substances of concern from natural gas combustion in the emission sources include carbon monoxide (CO), particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and total suspended particulate matter (TSP).</p> <p>Potential ammonia (NH<sub>3</sub>) resulting from operation of the SCR system has also been evaluated. Air quality modelling has been completed to assess the potential air quality effects of BBPP on the surrounding environment to ensure the predicted maximum</p>

Issues	Registry Comment Number	Response
		<p>concentrations comply with the current <i>Alberta Ambient Air Quality Objectives (AAAQOs)</i>. Dispersion modelling was performed utilizing CALPUFF in accordance with the requirements outlined within the <i>Alberta Environment and Protected Areas (AEPA) Air Quality Model Guideline (AQMG)</i>.</p> <p>In total, five modelling cases have been assessed. The results of the dispersion modelling indicate that the predicted maximum ground-level concentrations (MGLCs) of nitrogen dioxide (NO<sub>2</sub>), CO, PM<sub>2.5</sub>, TSP and NH<sub>3</sub> associated with various operating conditions comply with the applicable AAAQOs. Comparing existing emissions intensity of facilities cannot be completed due the large number of engineering variable conditions that would occur at similar sized facilities.</p> <p>However, it is important to note that the BBPP was approved by the Province of Alberta (Approval No.: 495201-00-00) on September 8, 2024. The terms and conditions attached to that approval provide a list of monitoring conditions for air emissions that must be met. These include continuous emissions monitoring for emissions intensity associated with monthly compliance reporting and annual reporting which demonstrates compliance with the terms and conditions of the approval.</p> <p>Kiwetinohk anticipates that on a per megawatt carbon dioxide emissions efficiency basis, the BBPP, if built as engineered, will be one of the most efficient natural gas-fired power generation facilities in Alberta and will produce electricity than is lower in emissions than the Alberta average today (using the 2023 emissions grid displacement factor).</p>
<p>23. Request alternative pipeline and transmission line routes be considered to avoid new disturbance and, where possible, restoration of construction areas to functional habitat.</p>	<p>21, 12</p>	<p>Three potential transmission line route options were selected by ATCO, which is managing the interconnection permitting, however only the preferred route will be constructed. ATCO will select the preferred route and manage the permitting through the AESO and AUC process. Additional information can be found in the Initial Project Description under section 9.1.4, and Figure 3 of Appendix B.</p> <p>To fuel the BBPP, natural gas will be supplied from a new dedicated pipeline. The new pipeline will connect to an existing underground gas pipeline approximately 3.8 km northeast of the BBPP. Two potential routes, intended to follow existing disturbances where practical, are under consideration and only one will be built. A separate application will be made through the Alberta Energy Regulator (AER) for the route selected. Consultation for this pipeline will be conducted at that time.</p> <p>Restoration would be required to existing Alberta Environment and Protected Area standards. If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure, including interim and end-of-life pipeline and transmission line right-of-way restoration and reclamation.</p> <p>Additional information can be found in the Initial Project Description under section 9.1.2, and Figure 2 of Appendix B.</p>

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<b>Atmospheric Environment</b>																														
24. Consider providing an air quality assessment, including baseline information, for all substances or air pollutants generated during each phase of the Project, including nitrogen oxides, sulphur oxides, dust, particulate matter (PM, PM2.5, and PM10), carbon monoxide, hydrogen sulphide, ozone, diesel particulate matter, volatile organic compounds, polycyclic aromatic compounds, metals, and other substances that may be released from project activities and components. Address the inconsistencies in air quality modelling between Appendix N and Appendix O in the Initial Project Description.	20, 12	The BBPP used the <i>Alberta Ambient Air Quality Objectives (AAAQO)</i> as air quality standards in the air dispersion modelling report as required for application to Alberta Environment. The <i>Canadian Ambient Air Quality Standards (CAAQS)</i> were considered in Appendix O – Emission Intensity Report (Table 7, page 9), but were not considered in the air dispersion modelling report as the CAAQS are not a requirement of the Alberta Environment modelling and application methodology or requirements.																												
25. Consider using the most up to date 2025 Canadian Ambient Air Quality Standards values for nitrogen dioxide in the Emissions Intensity Report as construction begins in 2026.	12	<p>At the time of submission, the 2025 values were not in effect. The 2025 CAAQS have changed as follows:</p> <table border="1" data-bbox="916 902 1663 1114"> <thead> <tr> <th colspan="2" rowspan="2"></th> <th colspan="4">CAAQS<sup>3</sup></th> </tr> <tr> <th colspan="2">2020<sup>4</sup></th> <th colspan="2">2025</th> </tr> <tr> <th></th> <th></th> <th>ppb</th> <th>ug/m<sup>3</sup></th> <th>ppb</th> <th>ug/m<sup>3</sup></th> </tr> </thead> <tbody> <tr> <td>NO<sub>2</sub></td> <td>1 hour</td> <td>60</td> <td>112.8</td> <td>42</td> <td>78.96</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>Annual</td> <td>17</td> <td>31.96</td> <td>12</td> <td>22.56</td> </tr> </tbody> </table> <p>The predicted Maximum Ground Level Concentrations (MGLCs) of NO<sub>2</sub> are provided in Table 7 of Appendix O in the Initial Project Description, using 2 project cases. In P1 case the predicted 1-hour MGLC is 89.1 ug/m<sup>3</sup>. The CAAQS (2025) 1-hour values are 78.96 ug/m<sup>3</sup>. The predicted annual MGLC is 9.5 ug/m<sup>3</sup>. The CAAQS (2025) annual values are 22.56 ug/m<sup>3</sup>. The results are such that the 1-hour predicted MGLC exceeds the CAAQS but the annual predicted MGLC do not.</p>			CAAQS <sup>3</sup>				2020 <sup>4</sup>		2025				ppb	ug/m <sup>3</sup>	ppb	ug/m <sup>3</sup>	NO <sub>2</sub>	1 hour	60	112.8	42	78.96	NO <sub>2</sub>	Annual	17	31.96	12	22.56
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<sup>3</sup> <https://ccme.ca/en/air-quality-report>

<sup>4</sup> Conversion of ppb to ug/m<sup>3</sup> using the WHO conversion at 25 degrees Celsius and 1013mb: 1 ppb = 1.88 ug/m<sup>3</sup>

Issues	Registry Comment Number	Response
26. Provide a rationale for the representativeness of the chosen air quality monitoring stations within the project area, including distance from the Project, nearby industrial activities, potential nearby receptors, and historic geographic data.	12	Dispersion modelling was performed using the United States Environmental Protection Agency (U.S. EPA) CALPUFF dispersion mode, in accordance with the requirements outlined within the Alberta Environment and Parks (AEP) Air Quality Model Guideline (AQMG; AEP, 2021a) (the ministry was later renamed to 'Alberta Environment and Protected Areas'). The BBPP is located within the West Central Airshed Society (WCAS). The nearest continuous ambient air monitoring stations that contain publicly available data for NO <sub>2</sub> , CO, NH <sub>3</sub> and PM <sub>2.5</sub> were used in the Air Quality Assessment provided in Appendix N of the Initial Project Description. No other air monitoring stations were available for use. Further to that, AEPA has reviewed the Air Quality Assessment and issued approval for the BBPP (approval 495201-00-00, September 8, 2024) with no comments about the applicability of the chosen air quality monitoring stations.
<b>Climate Change and Greenhouse Gas Emissions</b>		
27. Concerns regarding the efficacy and efficiency of carbon capture technology as a mitigation measure for greenhouse gas emissions. Recommend that project-related greenhouse gas emissions and associated contributions to climate change be assessed under the assumption that carbon capture technology is not used for the Project.	18, 8, 21	As per Table 4 of the Emissions Intensity Report (Appendix O; Initial Project Description), the GHG emission with and without Carbon Capture and Storage are provided. Calculations integrated conservative values, where maximum power generation (100% load) is assumed to occur continuously over the course of a year.  If the federal Clean Electricity Regulations are finalized in Gazette 2, which is expected in early 2025, the BBPP will be required to comply with those emissions requirements.
28. Clarify the length of time that the Project is predicted to emit greenhouse gases at a rate of 383 tonnes of carbon dioxide per gigawatt hour and whether the Project's greenhouse gas emissions are likely to exceed the allowable limits set by the Government of Alberta.	16	Emissions estimates were calculated based on conservative estimates of facility operation parameters (e.g. facility operates at peak load 24 hr/day, 365 days/year, no maintenance shutdown periods or other non-operating plant scenarios). As a result, the predicted GHG emissions are likely higher than actual and would not be expected to exceed the allowable CO <sub>2e</sub> emissions limits.
29. Clarify whether the Project will be subject to a Technology Innovation and Emissions Reduction credits program prior to the incorporation of carbon capture and storage technology.	16	The BBPP will be subject to the Alberta Technology Innovation and Emissions Reduction (TIER) policy and is expected to be eligible to generate credits under TIER, based on the current regulatory framework and associated High Performance Benchmark.  Kiwetinohk continues to assess opportunities for carbon capture at the BBPP, which would be required to achieve greenhouse gas emissions reductions from power generation and comply with emerging federal Clean Electricity Regulations. Any carbon dioxide captured at the BBPP would be potentially stored deep underground from a location on or near the BBPP as part of the separately proposed Black Bear Carbon Hub, or the carbon dioxide could be transported elsewhere for storage or use.  Development and implementation of carbon capture and / or storage at or near the BBPP would be subject to a separate regulatory

Issues	Registry Comment Number	Response
		process and depends on wide range of factors including technology commercialization, economics, continued policy and regulatory development, and Indigenous and stakeholder support.
30. Provide an estimate of potential greenhouse gas emissions associated with the maximum power output of 460 MW.	17	As per Table 4 of the Emissions Intensity Report (Appendix O; Initial Project Description), the GHG emission with and without Carbon Capture and Storage are provided and the estimated GHG emissions are 96,045 tCO <sub>2</sub> e and 1,445,685 tCO <sub>2</sub> e (based on anticipated fuel use) respectively.
31. Consider assessing the Project's greenhouse gas emissions and climate change impacts in accordance with the Strategic Assessment of Climate Change, including development of a plan to achieve net zero emissions by 2050.	12	<p>If the federal Clean Electricity Regulations (CER) are finalized in Gazette 2, which is expected in early 2025, the BBPP will be required to comply with those emissions requirements.</p> <p>Environment and Climate Change Canada states: "The CER are an integral part of Canada's 2030 Emissions Reduction Plan to help the country reach its emissions reduction target of 40 to 45 per cent below 2005 levels by 2030 and net-zero emissions by 2050." (Source: <a href="https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/clean-electricity-regulation.html">https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/clean-electricity-regulation.html</a>)</p>
32. Engage with Indigenous groups regarding how to incorporate Indigenous knowledge and experience into the assessment of the potential effects of climate change from greenhouse gas emissions on Indigenous peoples and to inform sustainable project development.	18	<p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.</p> <p>Some Indigenous Groups indicated interest in the potential of traditional land use studies to help determine the effects of the BBPP on current and traditional land uses. If the BBPP is approved, Kiwetinohk would continue to engage interested Indigenous Groups with respect to the scope of a traditional use study, seeking to establish, for example, an understanding of potential study participants and terms of reference. Kiwetinohk would consider funding a proportional amount of study costs with other partners such as government and industry.</p>
33. Describe the Project's resilience to future climate change and how this has been or will be considered in project design, where relevant. Include considerations of climate change in quantifying project-related water needs and the estimate of the stormwater pond capacity, including the use of more suitable intensity duration frequency data.	12	<p>Extreme hot and cold weather, heavy snowfall, heavy rainfall and wildfires may restrict our ability to access the BBPP site, causing operational difficulties, including damage to machinery and facilities. Extreme weather may also increase the risk of personnel injury as the result of dangerous working conditions.</p> <p>The BBPP is located close to forests, and wildfires may lead to significant downtime and/ or damage. Extreme weather may also disrupt our ability to transport produced natural gas and power, and goods and services along the supply chain. Extreme heat and smoke also present's safety risks to workers. Kiwetinohk has detailed emergency preparedness and response plans in place to ensure we can respond to wildfire situations effectively while maintaining a very high priority on safety of people.</p> <p>The BBPP is not located in stressed watersheds where the current availability of water, or severe restrictions on water withdrawals, could compromise our ability to operate. The BBPP design significantly reduces or eliminates operational reliance on the Freeman</p>

Issues	Registry Comment Number	Response
		<p>River for water. If process water and ground water sources are not adequate, the BBPP can optimize and conserve water use in line with seasonal variations in water availability from the Freeman River through water storage, or by purchasing water supply services, as required. This could include the storage of water prior to shut down or other maintenance activities which would require water post activity to support startup of the BBPP. The facility will require an initial water volume of 4545 m<sup>3</sup>, which will be continuously recycled throughout power generation. The power generation process will operate with a net positive water balance up to an ambient temperature of 35°C. In this way, the BBPP will rely less upon surrounding watersheds to support operations as water recycling is built into the process design.</p> <p>The purpose of the stormwater pond is to hold runoff from major events and allow any solids to settle before being released. Climate change was considered in the design process for the stormwater pond as it is sized to accommodate the storage capacity for up to a 100-year 24-hour storm with an emergency spillway. The pond depth will be approximately 2 m including 0.6 m freeboard, with a capacity of approximately 16,600 m<sup>3</sup>.</p> <p>The BBPP location is not at high risk of flooding.</p>
<b>Cumulative Effects</b>		
<p>34. Provide information on the potential cumulative environmental, social, health, and economic effects of past, present, and reasonably foreseeable future projects within the vicinity of the Project, in combination with project effects, and their potential to affect public and Indigenous peoples' health and impact on Indigenous peoples' rights.</p>	<p>18, 11, 20</p>	<p>Given the localized and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible.</p> <p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>BBPP environmental impact mitigation measures include:</p> <ul style="list-style-type: none"> <li>• Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> <li>• Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has sufficient year around volumes to support potential diversion rates with no impacts to fish or fish habitat. (See section 9.1.3. Water Supply of the Initial Project Description.)</li> <li>• Furthermore, the BBPP can optimize and conserve water use in line with seasonal variations in water availability from the Freeman River through water storage. This could include the storage of water prior to shut down or other maintenance activities which would require water post activity to support startup of the BBPP. The facility will require an initial water volume of 4545 m<sup>3</sup>, which will</li> </ul>

Issues	Registry Comment Number	Response
		<p>be continuously recycled throughout power generation. The power generation process will operate with a net positive water balance up to an ambient temperature of 35°C. In this way, the BBPP will rely less upon surrounding watersheds to support operations as water recycling is built into the process design.</p> <p>Detailed information on point of diversion (POD) construction via an existing access to the river and required Department of Fisheries and Oceans fish and fish habitat protection measures is also available in the Initial Project Description. It is anticipated that Alberta Environment and Protected Areas will issue an approval with restrictive conditions to ensure authorized diversion only when Freeman River has sufficient flow to support the diversion rates.</p> <p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p> <p>There are no watercourses within, or immediately adjacent to, the BBPP. As such, no impacts to fish or fish habitat within or adjacent to BBPP's boundary are anticipated.</p> <ul style="list-style-type: none"> <li>• Industrial Water Run Off: Surface water runoff from the BBPP site would be collected in the storm water pond. Water meeting Alberta provincial standards for release may be released to adjoining upland areas. Water not meeting Alberta provincial standards for release would be pumped into a truck for disposal at an approved disposal site. Site design would not allow surplus run off to enter a watercourse. Migratory bird monitoring would be implemented and deterrents used, if required.</li> <li>• Industrial Wastewater Disposal: Industrial wastewater would be disposed of at approved wastewater disposal facilities.</li> <li>• Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</li> </ul> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p> <ul style="list-style-type: none"> <li>• Watercourses - Transmission Line &amp; Pipeline Impacts:</li> </ul> <p>Transmission Line: There are no watercourse crossings associated with the transmission line. While final routing will be</p>

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		<p>determined by provincial power regulators, all access would follow the most direct route deviating only to accommodate topography constraints and avoid environmental features. Therefore, there are no interactions of the transmission line with fish or fish habitat.</p> <p>Pipeline: All pipelines would be installed under watercourses using directional drilling. No disturbance to riparian vegetation, bed or banks would therefore occur. There would be no impacts to fish or fish habitat. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator (AER).</p> <ul style="list-style-type: none"> <li>• Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the BBPP's environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife aversion and avoidance measures, including management of potential attractants such as garage, track observations and use best practices where conflicts with wildlife may occur.</li> </ul> <p><i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for Migratory Birds Convention Act (MBCA) compliance:</p> <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible</li> </ol> <p><i>Vegetation &amp; traditional use:</i> The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk. Overall, the plant species identified at the BBPP are common to the area. A list of identified plant species is provided in Section 14.6.2 of the Initial Project Description. Through engagement, Kiwetinohk learned some plant species present on the proposed site are</p>

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		<p>in traditional use, however, there is no evidence of their use on the proposed BBPP site. If the BBPP is approved to proceed, Kiwetinohk would seek to work with Indigenous Groups to document the location of traditional plants and of harvesting (if desired).</p> <p>Due to previous logging and herbicide application, Kiwetinohk is advised by an Indigenous Group that the BBPP site may be less valuable for gathering than others in the area. As such, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which is in an industrial area, has previous disturbance through logging, and may be of less value for harvesting than other areas in the region due to previous herbicide application.</p> <p>Biodiversity on the proposed BBPP site is well represented in the region and therefore development of the site is not expected to impact Indigenous traditional uses or spiritual practices.</p> <p>Traditional Land Use Studies: Some Indigenous Groups indicated interest in the potential of traditional land use studies to help determine the effects of the BBPP on current and traditional land uses. If the BBPP is approved, Kiwetinohk would continue to engage interested Indigenous Groups with respect to the scope of a traditional use study, seeking to establish, for example, an understanding of potential study participants and terms of reference. Kiwetinohk would consider funding a proportional amount of study costs with other partners such as government and industry.</p> <p>Noise: The BBPP is located in an existing heavy industrial area with no residences located in the vicinity of the BBPP site. Noise modelling was completed using the highest noise levels associated with the operating facility, therefore, modelling assumes the highest possible levels at all times. As the BBPP operates and different equipment operates as required, any noise emissions would not exceed the permissible sound levels.</p> <p>Noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to wildlife and migratory birds. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</p> <p>To avoid conflict and complaints, Kiwetinohk would seek engagement with area Indigenous Groups on emergency response and / or emergency notifications, wildlife and environmental reporting, and seek to coordinate maintenance and operations scheduling to avoid specific events or times identified, and to obtain input to its Compliant Resolution Plan (CRP).</p> <p>The CRP will include Kiwetinohk's procedures for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP would include:</p>

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		<ul style="list-style-type: none"> <li>• Creating an accessible online portal to receive information from individuals or groups who have questions about the BBPP or have concerns.</li> <li>• Manage concerns and complaints openly, promptly and fulsomely.</li> <li>• Investigating the cause of complaints and take actions, if needed, to correct the problem.</li> <li>• Resolve concerns and complaints in a timely fashion; and</li> <li>• Learn from past experiences, maintain diligence in its ongoing operations and reduce impacts of the BBPP on the community.</li> </ul> <p>The CRP would:</p> <ol style="list-style-type: none"> <li>1. Record inquiries, comments, and complaints.</li> <li>2. Manage and record responses to inquiries, comments, and complaints.</li> <li>3. Support data collection and reporting requirements.</li> <li>4. Support and record communications, liaison, and notification activities ;</li> <li>5. Assist the Project team in managing operational issues and concerns; and,</li> <li>6. Work to a resolution of any concerns.</li> </ol> <p>Responses to inquiries or complaints will be coordinated and provided by Kiwetinohk in a manner appropriate to the type of inquiry, and may include:</p> <ul style="list-style-type: none"> <li>• Meetings in person.</li> <li>• Telephone calls.</li> <li>• Emails; or,</li> <li>• Letters.</li> </ul> <p>Concerns about economic development opportunities, both current and future:</p> <ul style="list-style-type: none"> <li>• <i>Economic development impacts resulting from loss of access to resources on the BBPP site</i> – Kiwetinohk is not aware of any existing or proposed future economic use of the proposed lands by Indigenous Groups. The BBPP lands’ timber rights are currently held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be permitted to remove timber for commercial sale from the lands. The lands are Government of Alberta Crown lands and as such Indigenous Groups, individuals or companies would be required to obtain a surface lease for use of the lands for any commercial purpose. At the time of the BBPP application, no such surface lease applications had been made. Oil and gas rights are owned by various companies (depending upon the subsurface formations) and therefore there are no subsurface rights available for the BBPP lands. The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk.</li> <li>• <i>Economic development opportunities associated with site development</i> – If the BBPP receives approval, economic opportunities at the BBPP for Indigenous people would include training, employment and / or business contracting opportunities similar to those Kiwetinohk has created in its upstream oil and gas business in the region.</li> </ul>

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		<p>Kiwetinohk currently supports Indigenous training, employment, contracting and other economic development, including the following:</p> <ol style="list-style-type: none"> <li>1. Indigenous operator trainee program – Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</li> <li>2. Business loans – Kiwetinohk funds small Indigenous business loans via the Indian Business Corporation with a focus on loan provision to Indigenous companies and individuals in Kiwetinohk’s areas of operations. This is an ongoing program, that could benefit local indigenous companies in the BBPP area.</li> <li>3. Participation in Economic Benefits – Kiwetinohk is committed to local Indigenous and local economic development in the region in which the BBPP will be constructed and operated. In the event Kiwetinohk contracts an EPC Contractor for construction of the BBPP, Kiwetinohk will require that the Contractor develops for Kiwetinohk approval, an Indigenous and Local Content Participation Plan which includes a plan to use local Indigenous supply and services procurement, contracting, training and employment, including having a process to ensure qualified local Indigenous and other local businesses are included on the bidders lists for any relevant scopes of work that are competitively bid to third parties.</li> <li>4. Kiwetinohk uses a prequalification tool where interested Indigenous companies can register for opportunities. Additionally, Kiwetinohk maintains an internal, community-based contractor and supplier list sorted by goods and services, which positions Kiwetinohk to ensure Indigenous providers of goods and services are identified and included in the bid process. Kiwetinohk intends to continue this approach going forward with the BBPP.</li> <li>5. When appropriate, Kiwetinohk will guide local individuals or service suppliers on pre-qualification requirements needed to access contracting, procurement and employment opportunities relevant to the different phases of the BBPP’s lifecycle.</li> <li>6. Through the BBPP’s construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs, and where feasible, identify opportunities to build local skills through training and development. Kiwetinohk may suggest existing training institutions, and service providers, as well as mentorship opportunities to support skill development. (See #1 above.)</li> </ol> <p><i>Health and Safety</i></p> <p>Safety of workers and surrounding communities is Kiwetinohk’s first priority.</p> <p>BBPP operations present no direct pathway for health impacts on neighbouring communities due to the BBPP’s design and engineering to operate within provincial and federal air emissions regulations.</p> <p><i>Process and Occupational Safety at the BBPP</i></p> <p>The BBPP is designed and engineered to high process safety standards, will be operated under safety protocols by qualified personnel and equipped with emergency response equipment. Kiwetinohk will seek certification of its health, safety and environment system for the BBPP providing additional third-party verification of the BBPP’s health and safety program and procedures.</p>

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		<p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will operate using an emergency response plan that includes notification and communication with Indigenous Groups. Kiwetinohk will seek Indigenous Groups' input into its BBPP emergency response notification and communication protocols and may seek Indigenous Groups participation in emergency response drills as appropriate.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>As part of its commitment to communities, Kiwetinohk will seek to hire staff who live and work in the region, supporting the region through additional property taxes and per capital funding for important services such as health care.</p> <p>In the construction phase, Kiwetinohk will seek to reduce the impact of its construction workforce on local health services by providing emergency medical services on site, and accessing additional medical care, where possible, via STARS air ambulance. Kiwetinohk plans to engage with Indigenous Groups, health care providers, municipal representatives and other stakeholders to plan for and mitigate impacts of its construction workforce on health care, public safety, vulnerable populations, and social services.</p> <p><i>Youth</i></p> <p>Kiwetinohk has not undertaken specific engagement with each Indigenous Groups' youth. If the BBPP is approved, Kiwetinohk will seek to:</p> <ul style="list-style-type: none"> <li>• Work with Indigenous Group leadership to identify and communicate the needs and interests of youth to Kiwetinohk</li> <li>• Share BBPP information, including training and employment information and opportunities, with youth</li> <li>• Provide BBPP information and opportunities online, including engagement via social media</li> <li>• Assess feasibility of training programs targeted at younger people similar to Kiwetinohk's existing, Indigenous Operator Training Program</li> <li>• Receive advice as to how best to engage with and support Indigenous youth. in our interactions</li> <li>• Develop youth-focused programs - As an example of one outreach program that was developed for Indigenous youth, Kiwetinohk, in conjunction with the University of Alberta Golden Bears hockey team, is participating in a newly created program that offers Indigenous youth an opportunity to attend a Golden Bears hockey game in Edmonton and at the same time learn more about educational programs at the University of Alberta, including Indigenous student programs. The program will also provide a hockey and floor hockey coaching session on Sturgeon Lake Cree Nation, combining this with the attendance players from the University of Alberta, Golden Bears hockey team and some faculty from the University of Alberta to engage with youth about the University of Alberta programs.</li> </ul> <p><i>Cultural Heritage</i></p>

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		<p>Currently, there are no identified sites or structures of historical, archaeological, paleontological, or architectural significance in the BBPP area.</p> <p>The identification of sites and potential risk to historical resources is first searched through the “Alberta Listing of Historic Resources” (the ‘Listing’). The Listing is a tool that developers, industry representatives, and regulators may use to help determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> <li>• Archaeological sites</li> <li>• Paleontological sites</li> <li>• Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.)</li> <li>• Historic structures</li> </ul> <p>The HRV listing provides proponents with advance notification of possible historic resource concerns and may be used as a tool for project planning. Used in conjunction with the Instructions for Use of the Listing and/or a relevant <u>Land Use Procedures Bulletin</u>, the Listing helps to determine if a proposed development needs approval under the Culture, Multiculturalism and Status of Women’s (CMSW) Historic Resources Management Branch’s (HRMB) <i>Historical Resources Act</i> approval process. The Listing indicates the Historic Resource Value (HRV), if any, that has been assigned to lands in the project area, and the Instructions for Use and the procedures bulletins explain the required action. In many cases, the required action is to submit a Historic Resources Application through the <u>Online Permitting and Clearance (OPaC) system</u>.<sup>5</sup></p> <p>In addition, the ACO’s consultation requirements are independent of CMSW’s, HRMB <i>Historical Resources Act</i> approval process. If a project area includes HRV 4c site(s), the ACO will inform proponents and direct them to contact CMSW.</p>
<b>Drinking Water</b>		
35. Assess the potential effects of the Project on human health from changes to drinking water quality (i.e. through drinking water usage of the Freeman River), including details of the proposed industrial runoff plan.	20	<p>Currently the Alberta Water Well Database does not identify any licensed potable water wells within 3 km of the BBPP. Additionally, the BBPP will implement a groundwater monitoring program, with the intent of the monitoring program to be the identification of potential impacts to groundwater that could then affect drinking water sources. If affects are identified, mitigation or remediation would be proposed to mitigate further effects. Furthermore, the water withdrawal requirements will ensure that there are no significant effects to the Freeman River flow volumes that would affect fish, benthic species, or other user requirements.</p> <p>These factors suggest there would be no effects to potable water sources around the BBPP.</p>

<sup>5</sup> Listing of Historic Resources. 2019. <https://www.alberta.ca/listing-historic-resources.aspx>

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<b>Economic Conditions</b>		
<p>36. Clarify how the predicted \$400 million and \$30 million in value-added contributions to the local economy from the construction and operation phases of the Project, respectively, was calculated. Delineate this information by municipal benefits, provincial benefits, and federal benefits.</p>	16	<p>The preliminary predicated value-added of \$400 million was based on the EPC and PreFEED cost estimates for the combined cycle, which was comprised of major equipment installation, field installation, balance of plant and commodities, construction management, engineering and indirect costs and contractor overhead profit and contingency estimates.</p> <p>The values are proprietary to Black and Veatch. Kiwetinohk is still in the early stages of analyzing costs and will be able to provide more details as the project progresses and the design is completed, and the EPC and equipment are selected.</p> <p>The onsite operating labour cost are projected to be an estimated \$36MM (\$1.22MM/year) depending on labour market factors.</p> <p>The projected property tax benefit over the 30 years project life space is an estimated \$126MM (\$4.2MM/year) depending on final capital cost and other factors.</p> <p>The operating costs are projected to be approximately \$300MM, depending on numerous factors including carbon tax, commodity process, labour rates.</p> <p>Specific local, provincial and national economic impacts will depend on a range of contracting and procurement considerations and decisions not yet assessed and taken.</p>
<p>37. Provide additional information on the Project's plan for employment, including how the number of attributed jobs during construction was calculated, expected salaries, how many employees would be hired directly by the Proponent, and how the employment opportunities during construction and operation will be distributed among local, provincial, national, and/or international job markets.</p>	16, 10	<p>The estimated employment for the duration of the construction period is an estimated 700 full-time equivalent jobs during peak months, averaging approximately 350 full-time equivalent jobs over the first 30 months of construction. Operational activities are expected to support approximately 30 full-time equivalent jobs.</p> <p>Salaries or wages will be determined by the market at the time of construction.</p> <p>Kiwetinohk will prioritize the hiring of local and Indigenous contractors and staff and will require any EPC to develop a local and Indigenous hiring and contracting plan for its approval.</p> <p>The number of employees hired directly by Kiwetinohk depends on a range of factors including construction contracting and procurement strategy and operational strategies that have not yet been fully assessed or decisions taken.</p> <p>Specific local, provincial and national economic impacts will depend on a range of contracting and procurement considerations and decisions not yet taken.</p>

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38. Clarify where or how the 350 to 700 employees will be housed during construction and what mitigation measures would be in place to address project effects to housing in local communities.	16, 10	Kiwetinohk will consider a number of options, including conversations with towns of Swan Hills and Whitecourt about the use of hotels and motels in these two respective towns. Kiwetinohk is aware of the impact that this many people could have on the availability of other users for hotels / motels in these towns. If the towns do not want Kiwetinohk to consider use of the accommodations during specific times of year, or for the entire year for that matter, Kiwetinohk will use a remote work camp(s), to be established in the general region. The location of remote work camps has not been determined at this time. It is likely that all three options will be used to balance housing for workers during construction. This method for housing determination would be considered typical for working in remote areas in Alberta.
39. Consider undertaking additional studies to understand the health, social, and economic context of the region in order to inform how to best address the effects of the Project on health, social, and economic conditions, and what solutions are necessary to deal with those effects appropriately.	10	If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure. Additional studies will be considered under the ongoing engagement process and informed by Indigenous Groups participating.
<b>Fish and Fish Habitat</b>		
40. Fisheries and Oceans Canada recommends that the Proponent submit a Request for Review, given that the Project may overlap with areas in which aquatic species at risk may be present.	15	This requested step will occur as a component of the permitting for construction and operations. A Request for Review may be submitted as a component of the permit and license requirements for water withdrawal from the Freeman River. Mitigation of effects is a required outcome of this review process and will be addressed during this permitting step.
41. Fisheries and Oceans Canada noted that they require additional information regarding the construction methods to be employed, location of disturbances, and proposed mitigation measures to limit potential effects to fish and fish habitat, in order to determine whether residual project effects may trigger the requirement for a <i>Fisheries Act</i> authorization.	15	This requested step will occur as a component of the permitting for construction and operations. A Request for Review may be submitted as a component of the permit and license requirements for water withdrawal from the Freeman River.

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<b>Indigenous Knowledge</b>		
42. Consider integrating Indigenous Knowledge into project development and the assessment of cumulative effects, taking into consideration that Indigenous groups are disproportionately affected by the effects of climate change.	18	<p>Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be less than non-negligible.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure. Opportunities to integrate Indigenous Knowledge will be considered under the ongoing engagement process, and given Indigenous control over their Indigenous Knowledge, determined by Indigenous Groups participating.</p>
<b>Indigenous Peoples' Rights</b>		
43. Conduct an assessment of potential project impacts on the rights of Indigenous peoples, disaggregated by Indigenous group, and identify potential mitigation and accommodation measures to address these impacts, in consultation with Indigenous groups.	17, 11	<p>See responses to issues 11 and 12.</p> <p>Kiwetinohk is unable to disaggregate potential impacts at this time and will continue to engage with Indigenous Groups on potential impact and mitigation efforts. If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.</p>
<b>Indigenous Peoples' Social and Economic Conditions</b>		
44. Consider inclusion of disaggregated data in the assessment of effects to Indigenous peoples' socio-economic conditions, particularly for the three closest First Nations reserves and District 21 of the Otipemisiwak Métis Government	13, 18	<p>If the BBPP receives approval, there will be economic opportunities at the BBPP for Indigenous people that would include training, employment and / or business contracting opportunities similar to those Kiwetinohk has created in its upstream oil and gas business in the region. Please see the response to number 46 below for a more complete description of these opportunities. Individual Indigenous Groups will have different skills, abilities and related indigenous owned and affiliated contracting companies available to provide goods and services. Those that are nearest to the project should have a natural advantage in competing for contracting and other opportunities due to proximity of their equipment and supplies.</p> <p>Kiwetinohk is unable to disaggregate data in the assessment of Indigenous peoples' socio-economic conditions at this time and will continue to engage with Indigenous Groups on potential socio-economic impact. If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests, including socio-economic interests and</p>

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		concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.
45. Clarify the hiring and retention approaches, including how principles of Gender-based Analysis Plus (GBA Plus) will be integrated into hiring processes, particularly with respect to local Indigenous, and underrepresented populations	13, 18, 10	<p>Employment opportunities related to the BBPP include both direct and in-direct employment with Kiwetinohk and its construction, operations, maintenance, and professional service partners. Women represent approximately 51% of Canada's population and 48% of its workforce but only about 27% of Canada's electricity generation workforce. Women comprise about 13% of Canada's construction workforce. Energy and construction jobs are well paid, with workers earning higher incomes than Canadian and provincial averages. Age, disability, economic status, education, gender, sex and sexual orientation, language, racialization, ethnicity, religion, and spirituality represent other identity factors for which electricity and construction sector worker data is not readily available.</p> <p>Kiwetinohk strives to create a workforce representative of the communities in which we operate, and we collect anonymized diversity data from our workers to understand our worker demographics. This data and annual workforce survey data is used to identify barriers to inclusion. In 2023, Kiwetinohk's diversity survey indicated the following:</p> <ul style="list-style-type: none"> <li>• 5% of people identified as Indigenous, including First Nations and Métis heritage</li> <li>• 25% of people identified as female and 66% as male.</li> <li>• Non-binary and two-spirited representation</li> <li>• 12% identify as having a disability</li> <li>• People identified as members of the 2SLGBTQ+ communities</li> </ul> <p>Note: Kiwetinohk did not ask for language, age, religious or spirituality data.</p> <p>Kiwetinohk develops annual diversity and inclusion training goals, and Indigenous cultural training program aligned with Call to Action 92 of the Truth and Reconciliation Commission.</p> <p>Employment opportunities with the BBPP are primarily full-time administration and operation roles and construction and maintenance contract roles, both of which require technical training and qualifications that can be acquired through work experience and formal training. Some roles also require specific physical abilities to ensure safety of workers and the community. Kiwetinohk identifies the training requirements, safety criteria and physical requirements (where applicable) of all its full-time roles, offering ongoing training and competency development programs. Kiwetinohk seeks specifically to increase workforce representation of Indigenous people in its operations through its operator trainee program and would consider specific school and work integrated learning initiatives to increase diversity in its workforce.</p> <p>Kiwetinohk existing Indigenous operator trainee program has an 85% retention rate in its first two years, with the one individual (female) leaving the program moving onto accept an offer of full-time employment which she said was made possible through gaining the experience from the Kiwetinohk program.</p>

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		<p>Kiwetinohk’s experience with its existing Indigenous operator trainee program indicates that qualified Indigenous candidates are available in the region, including female candidates. Kiwetinohk’s experience indicates there is opportunity to increase the number of qualified Indigenous candidates for trainee programs and other jobs through K-12 school engagement, and increased awareness of economic opportunities. Kiwetinohk measures retention of Indigenous, female and other under represented populations. Kiwetinohk provides staff with competitive pay, a range of health and wellness benefits, diversity and inclusion awareness and training, and surveys staff annually across organizational health, respectful workplace and other indicators. These best practices have produced strong retention of Indigenous, female and other diverse team members, and we continue to seek opportunities to improve so Kiwetinohk remains attractive to talent as an employer of choice.</p> <p>Hiring locally has a strong business case for Kiwetinohk. Kiwetinohk views hiring and retention of local staff as key to strong operational and safety performance.</p> <p>Significant indirect employment opportunities are anticipated as a result of BBPP economic activity over its lifespan. For example, residential construction industry jobs may be created to support additional local demand for housing. Discretionary income of workers may support food service and retail employment.</p>
<p>46. Describe the Project's potential to offer economic benefits for Indigenous groups, such as through employment opportunities, training, increased economic activity in the region, or opportunities for becoming financial stakeholders.</p>	<p>18, 16, 10, Alexis Nakota Sioux Nation</p>	<p>Kiwetinohk supports Indigenous training, employment, contracting and other economic development, including the following:</p> <ol style="list-style-type: none"> <li>1. Indigenous operator trainee program – Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</li> <li>2. Business loans – Kiwetinohk funds small Indigenous business loans via the Indian Business Corporation with a focus on loan provision to Indigenous companies and individuals in Kiwetinohk’s areas of operations. This is an ongoing program, that could benefit local indigenous companies in the BBPP area.</li> <li>3. Participation in Economic Benefits – Kiwetinohk is committed to local Indigenous and local economic development in the region in which the BBPP will be constructed and operated. In the event Kiwetinohk contracts an EPC Contractor for construction of the BBPP, Kiwetinohk will require that the Contractor develops for Kiwetinohk approval, an Indigenous and Local Content Participation Plan which includes a plan to use local Indigenous supply and services procurement, contracting, training and employment, including having a process to ensure qualified local Indigenous and other local businesses are included on the bidders lists for any relevant scopes of work that are competitively bid to third parties.</li> <li>4. Kiwetinohk uses a prequalification tool where interested Indigenous companies can register for opportunities. Additionally, Kiwetinohk maintains an internal, community-based contractor and supplier list sorted by goods and services, which positions Kiwetinohk to ensure Indigenous providers of goods and services are identified and included in the bid process. Kiwetinohk intends to continue this approach going forward with the BBPP.</li> <li>5. When appropriate, Kiwetinohk will guide local individuals or service suppliers on pre-qualification requirements needed to access contracting, procurement and employment opportunities relevant to the different phases of the BBPP’s lifecycle.</li> <li>6. Through the BBPP’s construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs, and where feasible, identify opportunities to build local skills through training and development. Kiwetinohk may</li> </ol>

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		<p>suggest existing training institutions, and service providers, as well as mentorship opportunities to support skill development. (See #1 above.)</p> <p>Kiwetinohk will engage with Indigenous Groups about opportunities to become financial stakeholders.</p>
<p>47. Provide additional demographic information about the Indigenous groups that may be affected by the Project.</p>	<p>10</p>	<p>Kiwetinohk has not requested collection of or access to Indigenous Groups' demographic information. Kiwetinohk respects Indigenous control, access and protection of their own data.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure. If desired and appropriate, Kiwetinohk would discuss specific demographical approaches, mitigation efforts and benefits opportunities with participating Indigenous Groups as part of this ongoing engagement process. Analysis of impacts and opportunities through a demographic lens would be considered as part of ongoing engagement processes, and given Indigenous control over their data, determined by Indigenous Groups participating.</p>
<p>48. Provide additional information regarding the benefits of the proposed Indigenous micro-loan program.</p>	<p>10</p>	<p>Kiwetinohk has funded the Kiwetinohk Indigenous Microloan Program (Program), through the Indian Business Corporation (IBC), with \$100,000 to be accessible to members of Indigenous Groups whose traditional lands are within Kiwetinohk areas of operations. In early 2023 Kiwetinohk circulated information about the Program to 17 Indigenous Groups, including all of the Indigenous Groups we have engaged for the BBPP. Under the Program, applicants are eligible to receive a loan up to \$10,000. The loans are to be paid back to IBC allowing these funds to be reinvested into the program and available for future loans within communities. This Program is designed to help create accessible funding, build business capacity within communities, create sustainable jobs and support local entrepreneurs.</p> <p>IBC is managing the funds on behalf of Kiwetinohk and has sole discretion as to the granting of such loans. Kiwetinohk is not involved in the decision-making surrounding individual loans.</p>
<p><b>Navigation</b></p>		
<p>49. Transport Canada noted that the Proponent should determine the regulatory requirements for an intake on the Freeman River (i.e. a navigable waterway) using the Project Review Tool on the Navigation Protection Program's website.</p>	<p>9</p>	<p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Once the BBPP has been approved through the higher-level regulatory processes, this requested step will occur as a component of the permitting for construction and operations. The Project Review Tool on the Navigation Protection Program's website will be completed. Mitigation of effects is a required outcome of this review process and will be addressed during this permitting step.</p>

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<b>Species at Risk, Terrestrial Wildlife, and their Habitat</b>		
<p>50. Provide additional information about potential effects to wildlife due to the Project, including loss of habitat, attractiveness of the stormwater pond to birds and amphibians, risks of wildlife accessing food sources like garbage, and details of the planned ethical management of wildlife. Discuss proposed mitigation and monitoring measures.</p>	<p>8, 17, 12</p>	<p>Kiwetinohk has worked to reduce the BBPP's environmental impact from site selection, engineering and design to operational and closure planning.</p> <p>Given these mitigation measures, and BBPP compliance with Alberta Environment and Protected Area's air, water and land regulations that consider cumulative impacts, the BBPP is anticipated to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>BBPP environmental impact mitigation measures include:</p> <ul style="list-style-type: none"> <li>• Site Selection: By selecting a site within a previously disturbed cut block within an area of heavy industrial use (e.g. logging, oil and gas, compressor station, frac sand mobilization, rail right-of-way) and with existing public access, Kiwetinohk avoids creating disturbance in a higher value area for wildlife and therefore hunting, trapping and fishing activities.</li> <li>• Watercourses &amp; Fish Habitat: The BBPP plans to use groundwater and process water and will divert water from the Freeman River under Alberta <i>Water Act</i> license only if groundwater water is insufficient. A water study indicates the Freeman River has sufficient year around volumes to support potential diversion rates with no impacts to fish or fish habitat. (See section 9.1.3. Water Supply of the Initial Project Description.) Furthermore, the BBPP can optimize and conserve water use in line with seasonal variations in water availability from the Freeman River through water storage. This could include the storage of water prior to shut down or other maintenance activities which would require water post activity to support startup of the BBPP. The facility will require an initial water volume of 4545 m<sup>3</sup>, which will be continuously recycled throughout power generation. The power generation process will operate with a net positive water balance up to an ambient temperature of 35°C. In this way, the BBPP will rely less upon surrounding watersheds to support operations as water recycling is built into the process design.</li> </ul> <p>Detailed information on point of diversion (POD) construction via an existing access to the river and required Department of Fisheries and Oceans fish and fish habitat protection measures is also available in the Initial Project Description. It is anticipated that Alberta Environment and Protected Areas will issue an approval with restrictive conditions to ensure authorized diversion only when Freeman River has sufficient flow to support the diversion rates.</p> <p>The intake will be placed under the water surface and marked and identified as required. The intake pipe poses no impediment to navigation and no permanent instream structures are required to support the intake. Installation of the water intake pipe would occur following all regulatory review and under permit from the Department of Fisheries and Oceans. Riparian impacts are required to be minimized in construction and operations.</p> <p>There are no watercourses within, or immediately adjacent to, the BBPP. As such, no impacts to fish or fish habitat within or adjacent to BBPP's boundary are anticipated.</p> <ul style="list-style-type: none"> <li>• Industrial Water Run Off: Surface water runoff from the BBPP site would be collected in the storm water pond. Water meeting Alberta provincial standards for release may be released to adjoining upland areas. Water not meeting Alberta provincial</li> </ul>

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		<p>standards for release would be pumped into a truck for disposal at an approved disposal site. Site design would not allow surplus run off to enter a watercourse. Migratory bird monitoring would be implemented and deterrents used, if required.</p> <ul style="list-style-type: none"> <li>Industrial Wastewater Disposal: Industrial wastewater would be disposed of at approved wastewater disposal facilities.</li> <li>Wetlands: A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</li> </ul> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p> <ul style="list-style-type: none"> <li>Watercourses - Transmission Line &amp; Pipeline Impacts: <p>Transmission line: There are no watercourse crossings associated with the transmission line. While final routing will be determined by provincial power regulators, all access would follow the most direct route deviating only to accommodate topography constraints and avoid environmental features. Therefore, there are no interactions of the transmission line with fish or fish habitat.</p> <p>Pipeline: All pipelines would be installed under watercourses using directional drilling. No disturbance to riparian vegetation, bed or banks would therefore occur. There would be no impacts to fish or fish habitat. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator (AER).</p> </li> <li>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the BBPP's environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife aversion and avoidance measures, including management of potential attractants such as garage, track observations and use best practices where conflicts with wildlife may occur.</li> </ul>

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		<p><i>Protection of migratory birds:</i> As per Section 19.3 of the Initial Project Description, Kiwetinohk has plans and protocols for Migratory Birds Convention Act (MBCA) compliance:</p> <ol style="list-style-type: none"> <li>1. All birds, their nests and their eggs will be protected when they are found.</li> <li>2. Bird surveys will be completed on site and up to 100 metres outside the BBPP boundary if clearing of vegetation or construction does not occur between September 1st and April 14th.</li> <li>3. During construction and operations, migratory bird monitoring would be implemented and deterrents used, if required. If nests are identified within infrastructure or equipment, the nests will be removed once it is determined there are no bird(s) in the nest, no eggs in the nest, and the bird species are not those listed in Schedule 1 of MBCA. If nest removal is required, then a permit under the Migratory Bird Regulations (MBR) 2022 may be required.</li> <li>4. BBPP lighting and noise during construction, operations and decommissioning would be controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, the use of lights at night will be minimized to the extent practicable. Lights would be installed facing downward, and wherever practical, motion-sensing lights used. Construction would primarily occur during daylight hours to reduce nighttime disturbance.</li> <li>5. Should monitoring during operations identify significant sensory disturbance or mortality events to a particular bird species, Kiwetinohk would implement an adaptive management protocol to monitor and mitigate future effects to the greatest extent possible</li> </ol>
51. Provide additional information regarding species at risk, including species identified by the Committee on the Status of Endangered Wildlife in Canada, and critical habitat that may interact with the Project, potential effects to species at risk, and mitigation and monitoring measures to be implemented.	12	<p>All wildlife species identified during surveys, in addition to those that may be expected due to the BBPP's location, were provided in Section 14.6.5 of the Initial Project Description.</p> <p>There is no federally defined critical habitat within or even in proximity to the BBPP. All proposed mitigation and monitoring have been provided. Terms and conditions for Alberta regulatory approvals can be provided upon request.</p> <p>Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the BBPP's environmental assessment. Kiwetinohk will implement wildlife protection, mitigation measures and operating requirements, including wildlife monitoring and full-time wildlife monitoring during construction. As experienced operator of gas wells and plants in the region, Kiwetinohk will have ongoing internal seasonal wildlife training, bulletins and observation forms during regular plant operations. This will include species of interest for traditional land use, species at risk (including grizzly bear), and migratory birds. Kiwetinohk will take wildlife aversion and avoidance measures, including management of potential attractants such as garage, track observations and use best practices where conflicts with wildlife may occur.</p>
52. Consider the development of additional mitigation measures, in consultation with Indigenous groups, to ensure project effects to wildlife are minimized, including restoration	7	<p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure. Kiwetinohk will consider development of additional wildlife and</p>

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of habitat in areas adjacent to the project site or elsewhere to offset habitat loss, restoration using native plants, and monitoring of wildlife.		habitat restoration mitigation efforts, informed and / or developed by participating Indigenous groups as part of this ongoing engagement process.
<b>Vulnerable Population Groups (GBA Plus)</b>		
53. The incorrect acronyms and definitions for “GBA Plus” and “2SLGBTQIA+” are used in the glossary of the Initial Project Description and should be revised.	13	Kiwetinohk views diversity acronyms as fluid and evolving and seeks to use the correct acronyms and definitions. The acronyms and associated definitions will be reviewed and updated as future reporting submissions are determined.
54. Discuss the Project's potential to increase gender-based violence and include any mitigation measures proposed to address this effect. Consider the Project's workforce, including a potential increase in transient, non-local workers, and how different populations (e.g., women, youth, children, (dis)abled, etc.) in the participating Indigenous groups may be affected by project-related social effects.	13, 18	<p>Women represent approximately 51% of Canada’s population and 48% of its workforce but only about 27% of Canada’s electricity generation workforce. Women comprise about 13% of Canada’s construction workforce. Energy and construction jobs are well paid, with workers earning higher incomes than Canadian and provincial averages.</p> <p>For its construction phase, Kiwetinohk expects the majority of construction work will be completed using a mobile construction workforce consisting of approximately 85- 90% men who would be living temporarily in the vicinity of the BBPP site in area hotels, short term accommodations and / or workers camp environments. A largely male mobile workforce increases risk of violence to women living in the region and increases opportunity for human trafficking of women. Research indicates the risks are increased for Indigenous women and younger women in the food service or hospitality industries who may be exposed to workers.</p> <p>Kiwetinohk will work collaboratively with Indigenous Groups, non-governmental organizations, local communities and its contractors to develop strategies and plans to reduce risks to women and other potential populations, including identification of specific groups, and risk factors and will develop options and programs to mitigate risk, including:</p> <ul style="list-style-type: none"> <li>• Engagement with local communities and Indigenous Groups to build awareness of risks and develop workforce management plans to reduce interaction between vulnerable and potentially at-risk populations and mobile workers. This includes worker transportation and accommodation planning, monitoring initiatives and reporting mechanisms.</li> <li>• Education and training of mobile workers to understand the history of colonialism and gender impacts, impacts and risks Indigenous women face today, and to identify victims of violence and / or human trafficking, resources, and reporting mechanisms. A survivor-informed customized program could be created and delivered in collaboration with community partners and construction contractors.</li> <li>• Increase awareness of and access to resources for women experiencing violence, trafficking or at risk via partnerships with established culturally appropriate experts and providers.</li> <li>• Create skill development and economic opportunities for local women as construction workers or contractors to provide economic opportunities, benefits and to improve gender diversity on the project work site.</li> <li>• Work with contractors to increase the number of women, particularly local Indigenous women, represented in the workforce to support economic inclusion.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Instill and enforce zero tolerance policy for harassment and violence in the workplace, including accommodations and catering providers.</li> <li>• Increase construction supervision and project ownership presence in camps, accommodation areas and communities where mobile workers are present.</li> </ul> <p>Monitoring and feedback on socio-economic impacts is important so Kiwetinohk can work with communities and construction contractors to reduce risk and increase benefits for women.</p> <p>In the operational phase, Kiwetinohk anticipates the majority of its workforce will be local. Kiwetinohk currently recruits, trains and employs local Indigenous people via an operator trainee program designed to provide training and work experience in the field of well operations. If BBPP is approved, Kiwetinohk would seek to expand this program to include BBPP operator trainees with the aim of establishing a local long-term employment.</p>
55. Discuss employment opportunities for diverse groups using a GBA Plus lens.	10	<p>Employment opportunities related to the BBPP include both direct and in-direct employment with Kiwetinohk and its construction, operations, maintenance, and professional service partners. Women represent approximately 51% of Canada's population and 48% of its workforce but only about 27% of Canada's electricity generation workforce. Women comprise about 13% of Canada's construction workforce. Energy and construction jobs are well paid, with workers earning higher incomes than Canadian and provincial averages. Age, disability, economic status, education, gender, sex and sexual orientation, language, racialization, ethnicity, religion, and spirituality represent other identity factors for which electricity and construction sector worker data is not readily available. Kiwetinohk strives to create a workforce representative of the communities in which we operate, and we collect anonymized diversity data from our workers to understand our worker demographics. This data and annual workforce survey data is used to identify barriers to inclusion. In 2023, Kiwetinohk's diversity survey indicated the following:</p> <ul style="list-style-type: none"> <li>• 5% of people identified as Indigenous, including First Nations and Métis heritage</li> <li>• 25% of people identified as female and 66% as male.</li> <li>• Non-binary and two-spirited representation</li> <li>• 12% identify as having a disability</li> <li>• People identified as members of the 2SLGBTQ+ communities</li> </ul> <p>Note: Kiwetinohk did not ask for language, age, religious or spirituality data.</p> <p>Kiwetinohk develops annual diversity and inclusion training goals, and Indigenous cultural training program aligned with Call to Action 92 of the Truth and Reconciliation Commission.</p> <p>Employment opportunities with the BBPP are primarily full-time administration and operation roles and construction and maintenance contract roles, both of which require technical training and qualifications that can be acquired through work experience and formal training. Some roles also require specific physical abilities to ensure safety of workers and the community. Kiwetinohk identifies the training requirements, safety criteria and physical requirements (where applicable) of all its full-time roles, offering ongoing training and</p>

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		<p>competency development programs. Kiwetinohk seeks specifically to increase workforce representation of Indigenous people in its operations through its operator trainee program and would consider specific initiatives to increase diversity in its workforce.</p> <p>Significant indirect employment opportunities are anticipated as a result of BBPP economic activity over its lifespan. For example, residential construction industry jobs may be created to support additional local demand for housing. Discretionary income of workers may support food service and retail employment.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement protocol with Indigenous Groups on whose traditional lands the BBPP is located to build upon engagement activities that have already been completed. Working to develop and adjust communication and engagement protocols as necessary will help BBPP to further understand specific interests and concerns so we can notify, communicate to and engage with Indigenous groups on environmental, economic and social matters across the BBPP's lifecycle, from construction to closure.</p>
<b>Water – Groundwater and Surface Water</b>		
<p>56. Provide information on the proposed water withdrawal from the Freeman River, including seasonal river flow rates and how they would be affected, potential effects to riparian zone, any other sources of water withdrawals that may affect flow. Discuss proposed mitigation measures to address project effects to the Freeman River and planned monitoring to ensure that the amount of water withdrawn does not affect fish and plant species in the river.</p>	<p>17</p>	<p>This requested step will occur as a component of the permitting for construction and operations. A Request for Review may be submitted as a component of the permit and license requirements for water withdrawal from the Freeman River. Mitigation of effects is a required outcome of this review process and will be addressed during this permitting step.</p>
<p>57. Provide additional information on potential direct and indirect effects of project components or activities on wetlands, including changes to wetland function, and proposed mitigation measures that will be implemented to offset permanent wetland loss due to the construction of the Project, such as wetland restoration and/or compensation.</p>	<p>17, 12</p>	<p>A 0.09 hectare seasonal marsh wetland exists on the BBPP site and will be lost during BBPP construction. When the BBPP is approved through higher-level regulatory processes, wetland functions will be determined as a component wetland loss permitting under Alberta Wetland Policy. Kiwetinohk must complete a Wetland Alteration Impact Report (WAIR) detailing wetland functions in accordance with the Alberta <i>Water Act</i>. Alberta Environment and Protected Areas use the WAIR to determine compensation ratios and rates for the wetland loss.</p> <p>Wetlands located near the BBPP site were identified using the Alberta Merged Wetland Inventory (AMWI) spatial file, which digitally depicts wetlands for planning purposes. The nearest wetland identified through the AMWI is located approximately 850 metres west of the BBPP site. Given the distance and forested land separating the BBPP and these wetlands, and the erosion and sediment controls planned during construction, no impacts to wetlands outside the BBPP boundary are anticipated to occur.</p>

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<b>Other Factors that IAAC Considers Relevant</b>		
58. Discuss potential positive social and economic benefits to the surrounding municipalities that may occur because of carrying out the Project.	5, 14, 10	<p>Kiwetinohk will engage with the towns of Swan Hills and Whitecourt about the use of hotels and motels to accommodate construction and maintenance workers.</p> <p>Kiwetinohk is aware of the impact that this many people could have on the availability of other users for hotels / motels in these towns. If the towns do not want Kiwetinohk to consider use of the accommodations during specific times of year, or for the entire year for that matter, Kiwetinohk will use a remote work camp(s), to be established in the general region. The location of remote work camps has not been determined at this time. It is likely that all three options will be used to balance housing for workers during construction.</p> <p>This method for housing determination would be considered typical for working in remote areas in Alberta.</p> <p>If the BBPP receives approval, economic opportunities at the BBPP for Indigenous people would include training, employment and / or business contracting opportunities similar to those Kiwetinohk has created in its upstream oil and gas business in the region.</p> <p>In addition to ongoing need for accommodations and food services, Kiwetinohk currently supports local and Indigenous training, employment, contracting and other economic development, including the following:</p> <ol style="list-style-type: none"> <li>1. Participation in Economic Benefits – Kiwetinohk is committed to local Indigenous and local economic development in the region in which the BBPP will be constructed and operated. In the event Kiwetinohk contracts an EPC Contractor for construction of the BBPP, Kiwetinohk will require that the Contractor develops for Kiwetinohk approval, an Indigenous and Local Content Participation Plan which includes a plan to use local and Indigenous supply and services procurement, contracting, training and employment, including having a process to ensure qualified local Indigenous and other local businesses are included on the bidders lists for any relevant scopes of work that are competitively bid to third parties.</li> <li>2. Kiwetinohk uses a prequalification tool where interested local and Indigenous companies can register for opportunities.</li> <li>3. When appropriate, Kiwetinohk will guide local individuals or service suppliers on pre-qualification requirements needed to access contracting, procurement and employment opportunities relevant to the different phases of the BBPP's lifecycle.</li> <li>4. Through the BBPP's construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs, and where feasible, identify opportunities to build local skills through training and development. Kiwetinohk may suggest existing training institutions, and service providers, as well as mentorship opportunities to support skill development. (See #1 above.)</li> </ol>
59. Provide additional information on natural gas demand requirements for the Project.	16	As per the project description information and AEPA Industrial Approval application, depending on the actual heating value of the gas, the project is expected to consume between 65-75MMSCFD at full output.

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60. Describe planned monitoring of project facilities and pipelines to ensure safety and to minimize project effects to the environment.	21	Kiwetinohk will have various levels of environmental monitoring during the different phases of the project lifecycle. Along with pre-disturbance assessments and consultation, during construction, environmental monitors will be present to monitor soil and vegetation salvage/storage, and continuous wildlife monitoring with special consideration to restricted access periods. During project operation, based on final project approval, Kiwetinohk will be subject to a strict daily, monthly and yearly monitoring schedule which includes air monitoring and membership to the West Central Airshed Society, industrial wastewater, waste management, land conservation (topsoil conservation), groundwater monitoring, soil monitoring and a site decommissioning and land reclamation plan for post operation shutdown and restoration.
61. Provide additional information to support production capacity estimates for the Project and the purpose of and need for the Project.	16	With respect to the need to site the BBPP in the Whitecourt region of Alberta, this area of the province offers both infrastructure capacity and execution support capabilities to host the BBPP. This includes access to over 1,000 MW of new generation interconnection capacity on the existing 240 kV transmission network in the Whitecourt area. This means there would be no expected need for transmission system expansion to accommodate the BBPP. Moreover, the BBPP was sited to provide critical and reliable power generation in an area where load demand exceeds generation.
62. Discuss the operational status of the drilled oil well pads described in the Initial Project Description.	16	There are 4 wells adjacent to the BBPP project boundary. Two drilled oil wells are listed as Crude-Oil Pumping. There is one water injection well listed as suspended, and one water injection well listed as abandoned. These wells have no intended use by the BBPP and do not support, or effect, the project in any way.