

Montreal Pipe Line Limited Emergency Management Program:

Introduction:

As stated in the Montreal Pipe Line Limited (MPLL) Corporate Policy on the Environment MPLL will manage our business with the goal of preventing incidents, resource conservation, controlling the release of harmful emissions and wastes to below harmful levels, and maintaining our facilities to this end. MPLL will respond quickly and efficiently to any environmental incidents resulting from our operations and in cooperation with industry organizations and government agencies. MPLL will take reasonable steps to communicate with appropriate officials and others who might be affected by the environmental aspects of the Company's operations and share our experiences with others to facilitate improvements in industry performance. MPLL has developed a comprehensive Emergency Procedures Manual, PMPL Integrated Contingency Plan (ICP), which identifies all hazards and mitigations in place to address the hazards. The PMPL ICP is submitted to the Board as required by Section 32(1.1) and 32(2) of the *National Energy Board Onshore Pipeline Regulations (OPR)*. The MPLL Emergency Management Program is subject to continual improvement through internal and external inspections and audits as required by Section 53 and Section 55(a) of the *OPR*. Additionally, the PMPL ICP contains a list of agencies to be contacted during an emergency; the names and phone numbers of key personnel; and the location and description of major repair equipment as required by CSA Z662.

Key Public Safety Information:

During an incident the public, first responders, municipalities, Indigenous communities and provincial and federal agencies are notified as specified in Section 2 Notification Procedures of the PMPL ICP. MPLL personnel conduct liaisons with external stakeholders to ensure our notification numbers and procedures are up to date. Notification procedures are tested during drills/exercises of the PMPL ICP notification to confirm accuracy. In the event of an environmental incident or suspicious activity the public can notify MPLL 24 hours a day at 1-888-977-4589. MPLL is a crude oil transportation company. MPLL conducts training, meets with local emergency officials, and retains resources in preparation for the response to a pipeline release. In the event of a release the public should avoid making contact with the escaping liquids or vapors as potential hazards may include eye, skin and respiratory irritation. The escaping product may be highly flammable. Please review the emergency response section of the PMPL website (www.pmpl.com) for more information of what to do in the event of a release and how to recognize a pipeline release. The PMPL ICP includes guidance and resources for air monitoring and how water supplies would be protected in the event of an incident.

Emergency Procedures Manual:

The PMPL Integrated Contingency Plan is divided into seven Sections:

- Section 1: Introduction and Plan Content
- Section 2: Notification Procedures
- Section 3: Response Actions
- Section 4: Response Teams
- Section 5: Response Equipment and Resources
- Section 6: Spill Impact Considerations
- Section 7: PPLC and MPLL Specific Plans

In addition an overview of relevant supporting documents are contained in the PMPL ICP thirteen Appendices providing general information, resources, evacuation and disposal plans, hazard evaluations, Incident Command System (ICS) Forms, etc. The PMPL ICP is available for review at www.pmpl.com. It is important to note that specific information has been redacted and protected from publication. This information includes:

- Personal information, such as names, medical and contact information;
- Security information such as information where there is a risk that its disclosure will impair the security of a pipeline; and
- Species at risk and heritage resources information such as the location of Indigenous traditional land use sites, archaeological sites and paleontological sites. Disclosure of this information could lead to destruction or exploitation of these sites.

Emergency Management Program:

In 1994, PMPL implemented the Portland Montreal Integrity Managing System (PMIMS). PMIMS is an Operations Integrity management system designed to provide overall guidance in all aspects of PMPL operations including Emergency Response and Response to Community Expectations. PMIMS is also in compliance with the *National Energy Board Onshore Pipeline Regulations* Section 6 Management Systems as amended in November 2013. All required aspects of the Emergency Management Program are addressed throughout PMIMS.

Policy and Commitment:

PMIMS Element 1: Management, Leadership, Commitment and Accountability contains three individual policy and commitment statements for *Health and Safety, Security, and Environmental* respectively. These policies are reviewed and approved by Senior Management and posted all work sites.

Goals and Objectives:

PMIMS Element 10: Community Awareness and Emergency Response objectives:

- Positive community relations and timely response to community expectations and concerns regarding PMPL operations.
- Communicate security requirements to employees and contractors to prevent damage to PMPL facilities.
- Maintain Public Awareness Program to ensure community recognition and understanding of PMPL emergency response plans and expectations.
- Communicate with key stakeholders regarding resources at risk to minimize impact of incidents.
- Communicate consistent message to affected stakeholders of potential Operations Integrity risks.
- Ensure regulatory compliance.
- Appropriate level of equipment, facilities, and trained personnel needed for emergency responses and security preparedness are identified and readily available.
- Protect people, environment, company assets and reputation.
- Minimizing impact of incidents.
- Demonstrated ability to implement plan.
- Trained qualified personnel and contractors.
- Assure emergency response actions will be undertaken in accordance with the response times described in the PMPL ICP.

In addition to the Emergency Management Program PMPL maintains a Public Awareness Program. The goals and objectives of PMPL Public Awareness Program (PAP) is to raise awareness of the affected public and key stakeholders of the presence of pipelines in their communities and increase their understanding of the role of pipelines in transporting energy. PMPL hopes it will help the public to understand that while pipeline incidents are possible, pipelines are one of the safest modes of transportation, PMPL undertakes a variety of measures to prevent pipeline incidents, and PMPL anticipates and plans for management of incidents if they do occur. The PAP should help the public understand the one-call notification system prior to excavation and other damage prevention activities. The PAP also provides steps the public should take to ensure their safety in the event of a release and procedures for reporting a release or other pipeline emergencies.

Through this program, public awareness of the Portland Montreal Pipe Line System will be enhanced, thus reducing the risk of personal injury, incidents and damage to the environment from occurring. A more informed public will understand that they have an important role in helping prevent incidents that are caused by third party damage and ROW encroachment. The PAP will help in maintaining safe operations and the integrity and security of the pipeline system by reducing the risk of damage to the pipeline facilities. It will also provide a means of systematically updating property records, phone numbers, and addresses in the landowner's contact list. The PAP also satisfies the *National Energy Board Pipeline Damage Prevention Regulations, CSA Z662-15, Onshore Pipeline Regulations (OPR) Section 35* requirements for a public awareness program and for a continuing education program.

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

PMIMS Element 2: Risk Management provides the framework for MPLL to manage risks to safety, security, health, and the environment, and the potential financial impact, for all MPLL operations. Incorporated in Element 2 is an Enterprise Risk Management (ERM) Framework for risk management which identifies key risk in all business categories including Operations, Strategic, Compliance, and Financial. The objective is to reduce the number and severity of incidents that cause harm to people and/or the environment, and loss of MPLL facilities' integrity. Key risks identified include loss of crude oil from primary containment from MPLL piping or tank facilities, fire/explosion, sabotage or terrorism, natural disasters such as landslides, hurricanes, earthquakes, and floods, bomb threats, and medical emergencies. The PMPL ICP provides the framework for response to these incidents including the resources available, OSRO and clean-up contractor agreements, and MPLL owned equipment locations. Stakeholder engagement is derived from meetings with emergency first responders and other key stakeholders. MPLL believes that the use of the Incident Command System (ICS) during an emergency is the best way to ensure a prompt and efficient response when various jurisdictions or geographic boundaries are involved. The use of a Unified Command ensures that the Incident Commanders of all the major organizations that have jurisdictional authority are working together and present a unified front to remediate the incident. All decision making would be led by the Unified Command to set operational objectives including response tactics, clean-up, disposal, waste management, public information releases, and all other key operational strategies during the incident.

Stakeholder Liaison to Prepare for Emergencies

The PMPL PAP specifies how and when liaisons with local emergency first responders and public officials shall be conducted. MPLL personnel or representatives meet with these groups in person at a minimum of every two years with Company specific information being mailed throughout the year. During the meetings MPLL personnel utilize the PMPL PAP Emergency Officials Visits Checklist to ensure all relevant topics are discussed and reviewed and to provide consistency during these key meetings. The PMPL PAP provides guidance on how to identify key stakeholder groups such as the affected public, emergency officials, public officials and

excavators. There is a standardized message developed to deliver to each group supplemental program enhancements as necessary. The MPLL list of parties to contact contains location specific information for Emergency Responders. Additional communication to Emergency Officials in Canada is accomplished through membership in the Pipeline Committee in Quebec.

The Pipeline Committee is a committee that was created under the Info-Excavation One Call center organization, regrouping all its pipeline member companies operating in the Province of Quebec, with the mission of maintaining the integrity of the underground hydrocarbon pipelines systems through the development, communication and promotion of a joint message on safety and damage prevention. The targeted audiences are the Municipalities and regional county municipal organizations (les municipalités regionales de comté (MRCs)), the excavators, schools, public organizations and associations. Harmonized and pertinent information is transmitted to the targeted audience in communication session by representatives of the Pipeline Companies or through joint mailing or joint publications in different specialized newspaper or magazine. Examples include the Port of Montreal Authority, Canadian Coast Guard, Montreal Harbor Pilot Association, and fire and police departments in the communities in which MPLL operates.

Continuing Education

As required by the *National Energy Board Onshore Pipeline Regulations (OPR) Section 35* MPLL maintains a continuing education program for the police, fire departments, medical facilities, other appropriate organizations and agencies and the public residing adjacent to the pipeline to inform them of the location of the pipeline, potential emergency situations involving the pipeline and the safety procedures to be followed in the case of an emergency. The PMPL PAP describes how each individual group is addressed in continuing education program and how interested persons can engage in the process. Specific messages have been developed for the different groups. Examples include tailored messages to the affected public on how to recognize a pipeline is present, how to recognize a pipeline release and how to contact MPLL in the event of a release. This message is enhanced when delivered to emergency first responders to include discussions regarding the crude characteristics of the product being transported, actions to take as the emergency official, and the importance of life safety for the public and first responders during an emergency response.

Training and Exercises

PMIMS Element 5: Safety, Training and Personnel provides the framework and objective to place personnel with appropriate abilities, capabilities and qualifications to perform tasks that meet corporate goals and objectives and maintain the integrity of the operations under normal and abnormal conditions. The PMPL ICP Section 4 Response Teams describes in detail the roles and responsibilities of MPLL Spill Management Team (SMT) members as a function of ICS. This

includes the vital duties of the Qualified Individual, local response team, Spill Management Team and response team training including frequency of training and exercises. The PMPL ICP is available for review at www.pmpl.com. To ensure adequate response to any incident, recent exercise scenarios include smaller releases on company owned property to a larger full scale trans-border exercise along the international border.

Incident Management System

As stated in the PMPL ICP, MPLL uses the National Incident Management System (NIMS)- Incident Command System (ICS) to manage emergency response activities. The NIMS-ICS is a management tool which is readily adaptable to very small incidents as well as those of considerable significance and will be implemented for all discharge incidents with staffing levels adjusted as required to meet the specific needs (size and severity) of the incident.

First response to a discharge will be provided by the Company Local Response Team. In the event that the response operation is beyond the capability of the Local Response Team (LRT), the Incident Commander will consult with Management to evaluate the severity of the situation and determine whether activation of the Spill Management Team (SMT) is necessary.

The Company has adapted the NIMS-ICS-based response team to facilitate a rapid and efficient assessment of the situation and transition from reactive to proactive response operations. The activation, notification and roles and responsibilities of key Spill Management Team members are included in the PMPL ICP.

The goal of incident and crisis response operations is the restoration of normal operations while minimizing impacts to people, property, the environment, and the Company. To achieve this goal, response personnel must be able to move from a reactive to a project mode of operations by establishing and maintaining command and control over the situation. For incident response operations, this objective should be addressed by observing standard operating procedures that allow response personnel to rapidly and efficiently determine and communicate effectively about the incident and what is being done to address the incident.

During crisis response operations, crisis managers should address this objective by analyzing the information generated by incident response personnel and determining the implications of the incident on the Company. The analysis should focus on human resource, financial, business, legal, and external affairs issues.

If an incident escalates to require significant NIMS-ICS staffing, then additional support resources may be activated. Corporate Office management may activate supplemental team members to travel to the site to evaluate the incident, report back and to provide staffing to the NIMS-ICS if required. Additional support can be established at a Command Center to provide technical, logistical and operational support. Finally, a team of senior management and

staff can be formed to provide a focal point for communications and coordination. This group coordinates policies, procedures, and develops and selects appropriate strategies.

A detailed explanation of the NIMS-ICS and the roles and responsibilities for primary members of the Spill Management Team is provided in Appendix B of the PMPL ICP.

Provincial and other agencies are integrated into the incident management system through the Unified Command. The UC is responsible for overall management of an incident. The UC directs incident activities including the development and implementation of incident objectives, strategies, and approves ordering and releasing of resources.

While the UC structure is an excellent vehicle for tactical-level incident command, coordination, cooperation, and communication, the duly authorized UC members must make the system work successfully. The UC should develop synergy using the significant capabilities brought by its diverse members. While varied perspectives on UC and contentious issues arising from the incident may cause disagreement, resolution can be reached by using the UC framework, which provides a forum and process to resolve problems and find solutions. The UC is not a committee; in a situation where consensus cannot be reached, the UC member representing the agency with the most legal/jurisdictional authority would normally be deferred to for the final decision. Inability to provide clear incident objectives and response direction means that UC has failed.

UC COMPOSITION

UC composition for a specific incident will be determined on a case-by-case basis taking into account:

- A. The specifics of the incident.
- B. Determinations outlined in existing response plans.
- C. Decisions reached during the initial meeting of the UC.

The composition of the UC may change as an incident progresses in order to account for changes in the situation. In order to keep the UC limited in size, and therefore efficient, it is recommended that one federal agency be the lead agency to coordinate activities and actions among the various federal agencies involved; this concept applies to provincial, municipal and First Nations representation on the UC as well. UC members of other organizations should be encouraged to participate on the IMT in the functions that best suit their expertise. UC members may also be assigned individual legal and administrative support from their own organizations. Participation in the UC occurs without any organization abdicating authority, responsibility, or accountability.

In addition to selecting the primary agency/organization to staff critical IMT staff positions at the Incident Command (e.g., PIO, LOFR, OSC, and PSC), UC members should also agree on the number of personnel/organizations filling deputy positions. Deputy Section Chiefs can run the

Section while the Section Chief is in meetings and help manage span of control issues within the Section.

Note: The UC may assign Deputy ICs to assist in carrying out IC/UC responsibilities.

To be considered for a UC position, the involved organization:

- A. Must have jurisdictional authority or functional responsibility under a law or ordinance for the incident.
- B. Must have incident or response operations impact on the organization's Area of Responsibility (AOR).
- C. Must be specifically charged by law or ordinance with commanding, coordinating, or managing a major aspect of the incident response.
- D. Should have full organization authority to make decisions and execute all of the tasks assigned to the IC on behalf of their organization.