

Summary of Issues – Crosswalk Document

Black Bear Power Plant Project

KIWETINOHK RESPONSE (ENGLISH PLAIN-LANGUAGE SUMMARY)

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
Fish and Fish Habitat		
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>The BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Kiwetinohk is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta’s environmental regulations.

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		<p>3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO).</p> <p>4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities.</p> <p>5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted.</p> <p>6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator.</p> <p>In short, the BBPP has been carefully planned to avoid harming the environment, particularly water and wildlife. Given these mitigation measures, and compliance with the Alberta <i>Water Act</i> and other Alberta Environment and Protected Areas' (AEPA) water and wetland regulations, the Project is not anticipated to impact fish or fish habitat.</p>
Migratory Birds and their Habitat		
<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>	12	<p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it's confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible.

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		A small seasonal wetland will be lost during construction of the BBPP. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other impacts to nearby wetlands are expected to occur.
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.	12	<p>Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the Project's environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide seasonal wildlife training as well as bulletins and observation forms. This will include focusing on species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, track wildlife observations, and apply best practices when necessary.</p> <p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it's confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible. <p>A small seasonal wetland will be lost during construction of the BBPP. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other impacts to nearby wetlands are expected to occur.</p>
Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes		
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 vegetation assessment at the BBPP site did not identify any signs of plant gathering or plant species at risk. The plant species present are common to the area. Through engagement, Kiwetinohk learned some plant species used traditionally by Indigenous Groups are found on the site, however there is no evidence they are being gathered there. If the BBPP is approved, Kiwetinohk plans 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 use, an Indigenous Group has mentioned that the BBPP site may be less valuable for gathering</p>

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		<p>plants compared to other areas. As a result, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Indigenous Groups in the region engage in hunting, fishing, trapping, and cultural activities. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which has already been disturbed by logging and other industrial activities, and may not be as valuable for gathering as other areas nearby. Overall, the development of this site is not expected to impact Indigenous traditional uses or spiritual practices.</p>
<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.</p>	<p>18</p>	<p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>In short, the BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning. Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' (AEPA) air, water, and land regulations, the BBPP is expected to have less than non-negligible impacts on traditional use of resources in the area.</p> <p>Kiwetinohk is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO). 4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities. 5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted. 6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat

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		<p>would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator.</p> <p>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the Project's environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide internal seasonal wildlife training as well as bulletins and observation forms. This will include focusing on species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, including managing attractants such as garbage, tracking wildlife observations, and using best practices to prevent issues with wildlife.</p> <p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it's confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible. <p>Vegetation and Traditional Use: The vegetation assessment at the BBPP site did not identify any signs of plant gathering or plant species at risk. The plant species present are common to the area. Through engagement, Kiwetinohk learned some plant species used traditionally by Indigenous Groups are found on the site, however there is no evidence they are being gathered there. If the BBPP is approved, Kiwetinohk plans 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 use, an Indigenous Group has mentioned that the BBPP site may be less valuable for gathering plants compared to other areas. As a result, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups in the region engage in hunting, fishing, trapping, and cultural activities. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which has already been disturbed by logging and other industrial activities, and may not be as valuable for gathering as other areas nearby.</p>

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		<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 have shown interest in conducting traditional land use studies to understand the effects of the BBPP on current and traditional land uses. If the Project is approved, Kiwetinohk would continue working with these Indigenous Groups to define the study's scope, including who will participate, and the study's guidelines. Kiwetinohk is also open to helping fund part of the study, along with other partners such as the government and industry.</p> <p>Cumulative effects: Given the localized, low magnitude and reversible effects of the Project, impact to cumulative environmental effects is expected to be negligible.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, 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>In short, the BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with the Alberta <i>Water Act</i> and other Alberta Environment and Protected Areas' (AEPA) water and wetland regulations, the BBPP is expected to have less than non-negligible impacts on the traditional use of resources in the area.</p> <p>Kiwetinohk is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO).

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		<p>4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities.</p> <p>5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted.</p> <p>6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator.</p>
<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 a busy industrial area with no nearby homes. Noise levels were modeled at their highest to ensure they stay within acceptable limits. Noise emissions would not exceed the permissible sound levels. During construction, operation, and decommissioning, noise will be managed to avoid disturbing wildlife and migratory birds. Most construction work would happen during the day to reduce nighttime noise.</p> <p>To avoid conflicts and complaints, Kiwetinohk would seek engagement with local Indigenous Groups to discuss emergency responses, wildlife and environmental reporting, and to schedule activities in a way that avoids conflicts. They will also seek input on their Complaint Resolution Plan (CRP).</p> <p>The CRP will outline Kiwetinohk's process for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP will include:</p> <ul style="list-style-type: none"> • An online portal for people to submit questions or concerns about the BBPP. • A process to handle concerns and complaints quickly and transparently. • Investigation of complaints and taking action to fix problems if needed. • Resolving issues in a timely manner. • Learning from past experiences to reduce the Project's impact on the community. <p>The CRP will:</p> <ol style="list-style-type: none"> 1. Record all inquiries, comments, and complaints. 2. Track responses to these concerns. 3. Help with data collection and reporting. 4. Document communications and notifications.

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		<p>5. Assist the Project team in managing issues. 6. Work to resolve any concerns.</p> <p>Kiwetinohk will respond to inquiries or complaints in a way that suits the type of inquiry, which may include:</p> <ul style="list-style-type: none"> • Meetings in person. • Telephone calls. • Emails; or, • Letters.
<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>In short, the BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' (AEPA) air, water, and land regulations, the BBPP is expected to have less than non-negligible impacts on the traditional use of resources in the area.</p> <p>Kiwetinohk is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO). 4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities.

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Indigenous Peoples' Health, Social and Economic Conditions		
<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>	<p>13</p>	<p><i>Economic impact as a result of access to resources on the BBPP site:</i> Kiwetinohk is not aware of any current or future economic use of the BBPP site by Indigenous Groups. The timber rights for the land are held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be allowed to remove timber for commercial sale. Since the land is owned by the Government of Alberta, anyone wanting to use it commercially would need to obtain a surface lease, but no such leases have been applied for at the time of the application. Oil and gas rights are owned by different companies, so there are no subsurface rights available for the BBPP lands.</p> <p><i>Cumulative effects:</i> Given the localized, low magnitude and reversible effects of the BBPP, impact to cumulative environmental effects is expected to be negligible. No loss to current or future economic development opportunities has been identified.</p> <p><i>Economic opportunities associated with BBPP site development:</i> If the BBPP receives approval, Indigenous people may have economic opportunities through training, employment, or business contracts, similar to the opportunities Kiwetinohk has provided in its oil and gas operations in the region.</p> <p>Kiwetinohk supports Indigenous training, employment, contracting, and economic development in several ways:</p> <ol style="list-style-type: none"> 1. Indigenous Operator Trainee Program: Kiwetinohk recruits and trains local Indigenous people in well operations. If the BBPP is approved, Kiwetinohk would seek to expand the program to include BBPP operator trainees, with the goal of providing long-term local employment. 2. Business Loans: Kiwetinohk offers small business loans to Indigenous companies and individuals through the Indian Business Corporation, focusing on businesses in Kiwetinohk's operational areas. This program could also benefit local

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		<p>Indigenous businesses near the BBPP.</p> <ol style="list-style-type: none"> 3. Economic Participation: Kiwetinohk is committed to supporting local Indigenous and local economic development. If an Engineering, Procurement, and Construction (EPC) contractor is hired for the BBPP construction, Kiwetinohk will require the contractor to create a plan to include local Indigenous businesses in procurement, contracting, training, and employment. 4. Prequalification Tool: Kiwetinohk uses a tool where Indigenous companies can register for contracting opportunities. It also keeps a list of community-based contractors and suppliers, ensuring Indigenous providers are included in the bidding process. 5. Guidance for Local Providers: Kiwetinohk would guide local individuals and service providers to understand the pre-qualification requirements for contracting, procurement, and employment opportunities related to the BBPP. 6. Workforce Development: During the construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs and explore opportunities to build local skills through training and mentorship. Kiwetinohk may suggest training institutions and service providers to support this development.
<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 with high safety standards, will be operated by trained personnel, and will have emergency response equipment. Kiwetinohk plans to get third-party certification for its health, safety, and environmental system to verify the BBPP's safety program and procedures.</p> <p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will have an emergency response plan that includes notifying and communicating with Indigenous Groups. Kiwetinohk will ask for input from these groups on the plan and may invite them to participate in emergency response drills if needed.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>Kiwetinohk is committed to hiring local staff, which will support the region through property taxes and funding for services such as healthcare. During construction, Kiwetinohk plans to mitigate the impact of its workforce on local health services by providing emergency medical services on-site and using STARS air ambulance for additional care. Kiwetinohk will also work with Indigenous Groups, healthcare providers, local officials, and other stakeholders to plan and reduce the impact of its workforce on healthcare,</p>

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		public safety, vulnerable populations, and social services.
Indigenous Peoples' Rights		
<p>11. Describe engagement efforts that will be carried out with all Indigenous groups, including Indigenous youth, 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>	18, 11	<p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, 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"> • in-person or virtual meetings with Indigenous Groups' primary engagement contact • in-person or virtual meetings with Indigenous Group leadership • in-person or virtual meetings with Métis Settlement leaderships • in-person, virtual meetings, or phone conversations with First Nation trappers • community meetings • Ongoing Project notifications and updates • email and telephone communication • participation in community events to promote informal dialogue about the BBPP <p>Kiwetinohk has not yet specifically engaged with Indigenous Groups' youth. If the BBPP is approved, Kiwetinohk will seek to:</p> <ul style="list-style-type: none"> • Work with Indigenous Group leadership to identify and communicate the needs and interests of youth • Share BBPP information, including training and job opportunities, with youth • Provide BBPP information and opportunities online, including engagement via social media • Explore creating training programs targeted at younger people similar to Kiwetinohk's existing, Indigenous Operator Training Program • Receive advice from Indigenous Groups as to how best to engage with and support Indigenous youth. • Develop youth-focused programs, similar to the one Kiwetinohk is doing with the University of Alberta Golden Bears hockey team, which gives Indigenous youth the chance to attend games and learn about education programs, including Indigenous student initiatives, while also participating in sports and activities. <p>Through Indigenous engagement to date, several potential issues, concerns, and benefits of the Project have been raised:</p> <ol style="list-style-type: none"> 1. Potential impacts on wildlife, including displacement of species such as grizzly bear and moose

Issues	Registry Comment Number	Response
		<ol style="list-style-type: none"> 2. Loss of vegetation 3. Impacts to streams, waterbodies, and water quality 4. Cumulative impact on traditional lands 5. Potential health and well-being impacts from pollution and noise 6. Protection of sacred sites and traditional land use areas 7. Concerns about economic development opportunities, both current and future 8. Increased wind and erosion 9. Presence of environmental monitors 10. Risk to women from non-local workforce 11. Concern over the location of the proposed gas pipelines 12. Concern over the location of the proposed transmission line 13. Concern over potential carbon capture and storage 14. Concern over the BBPP's megawatt output 15. Desire continuous engagement through life cycle of the Project <p>Indigenous Groups practice hunting, fishing, trapping, use traditional plants and practice cultural activities in the region.</p> <p>In short, the BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' (AEPA) air, water, and land regulations, the BBPP is expected to have less than non-negligible impacts on the traditional use of resources in the area.</p> <p>BBPP mitigation measures that address concerns listed above include:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO). 4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water

Issues	Registry Comment Number	Response
		<p>runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities.</p> <p>5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted.</p> <p>6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator.</p> <p>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the Project's environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide internal seasonal wildlife training as well as bulletins and observation forms. This will include focusing on species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, including managing attractants such as garbage, tracking wildlife observations, and using best practices to prevent issues with wildlife.</p> <p>Kiwetinohk is an experienced oil and gas operator in the region and already has attractant management, bear awareness, and bear safety programs in place. These programs will be expanded and adjusted as needed for the BBPP. To date, Kiwetinohk's personnel have observed grizzly bears in their operating area but have not experienced any bear encounters, bear deaths, or incidents involving bears becoming habituated or relocated.</p> <p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it's confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible.

Issues	Registry Comment Number	Response
		<p>Vegetation and Traditional Use: The vegetation assessment at the BBPP site did not identify any signs of plant gathering or plant species at risk. The plant species present are common to the area. Through engagement, Kiwetinohk learned some plant species used traditionally by Indigenous Groups are found on the site, however there is no evidence they are being gathered there. If the BBPP is approved, Kiwetinohk plans 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 use, an Indigenous Group has mentioned that the BBPP site may be less valuable for gathering plants compared to other areas. As a result, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups in the region engage in hunting, fishing, trapping, and cultural activities. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which has already been disturbed by logging and other industrial activities, and may not be as valuable for gathering as other areas nearby.</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 have shown interest in conducting traditional land use studies to understand the effects of the BBPP on current and traditional land uses. If the Project is approved, Kiwetinohk would continue working with these Indigenous Groups to define the study's scope, including who will participate, and the study's guidelines. Kiwetinohk is also open to helping fund part of the study, along with other partners such as the government and industry.</p> <p>Cumulative effects: Given the localized, low magnitude and reversible effects of the Project, impact to cumulative environmental effects is expected to be negligible.</p> <p><i>Noise</i></p> <p>The BBPP is located in a busy industrial area with no nearby homes. Noise levels were modeled at their highest to ensure they stay within acceptable limits. Noise emissions would not exceed the permissible sound levels. During construction, operation, and decommissioning, noise will be managed to avoid disturbing wildlife and migratory birds. Most construction work would happen during the day to reduce nighttime noise.</p> <p>To avoid conflicts and complaints, Kiwetinohk would seek engagement with local Indigenous Groups to discuss emergency responses, wildlife and environmental reporting, and to schedule activities in a way that avoids conflicts. They will also seek input on their Complaint Resolution Plan (CRP).</p> <p>The CRP will outline Kiwetinohk's process for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p>

Issues	Registry Comment Number	Response
		<p>The CRP will include:</p> <ul style="list-style-type: none"> • An online portal for people to submit questions or concerns about the BBPP. • A process to handle concerns and complaints quickly and transparently. • Investigation of complaints and taking action to fix problems if needed. • Resolving issues in a timely manner. • Learning from past experiences to reduce the Project's impact on the community. <p>The CRP will:</p> <ol style="list-style-type: none"> 1. Record all inquiries, comments, and complaints. 2. Track responses to these concerns. 3. Help with data collection and reporting. 4. Document communications and notifications. 5. Assist the Project team in managing issues. 6. Work to resolve any concerns. <p>Kiwetinohk will respond to inquiries or complaints in a way that suits the type of inquiry, which may include:</p> <ul style="list-style-type: none"> • Meetings in person. • Telephone calls. • Emails; or, • Letters. <p>Concerns about economic development opportunities, both current and future:</p> <ul style="list-style-type: none"> • <i>Loss of access to resources on the BBPP site</i> – Kiwetinohk is not aware of any current or future economic use of the BBPP site by Indigenous Groups. The timber rights for the land are held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be allowed to remove timber for commercial sale. Since the land is owned by the Government of Alberta, anyone wanting to use it commercially would need to obtain a surface lease, but no such leases have been applied for at the time of the application. Oil and gas rights are owned by different companies, so 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. • <i>Economic opportunities associated with site development</i> – If the BBPP receives approval, Indigenous people may have economic opportunities through training, employment, or business contracts, similar to the opportunities Kiwetinohk has provided in its oil and gas operations in the region. <p>Kiwetinohk supports Indigenous training, employment, contracting, and economic development in several ways:</p>

Issues	Registry Comment Number	Response
		<ol style="list-style-type: none"> 1. Indigenous Operator Trainee Program: Kiwetinohk recruits and trains local Indigenous people in well operations. If the BBPP is approved, Kiwetinohk would seek to expand the program to include BBPP operator trainees, with the goal of providing long-term local employment. 2. Business Loans: Kiwetinohk offers small business loans to Indigenous companies and individuals through the Indian Business Corporation, focusing on businesses in Kiwetinohk's operational areas. This program could also benefit local Indigenous businesses near the BBPP. 3. Economic Participation: Kiwetinohk is committed to supporting local Indigenous and local economic development. If an Engineering, Procurement, and Construction (EPC) contractor is hired for the BBPP construction, Kiwetinohk will require the contractor to create a plan to include local Indigenous businesses in procurement, contracting, training, and employment. 4. Prequalification Tool: Kiwetinohk uses a tool where Indigenous companies can register for contracting opportunities. It also keeps a list of community-based contractors and suppliers, ensuring Indigenous providers are included in the bidding process. 5. Guidance for Local Providers: Kiwetinohk would guide local individuals and service providers to understand the pre-qualification requirements for contracting, procurement, and employment opportunities related to the BBPP. 6. Workforce Development: During the construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs and explore opportunities to build local skills through training and mentorship. Kiwetinohk may suggest training institutions and service providers to support this development. <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 with high safety standards, will be operated by trained personnel, and will have emergency response equipment. Kiwetinohk plans to get third-party certification for its health, safety, and environmental system to verify the BBPP's safety program and procedures.</p> <p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will have an emergency response plan that includes notifying and communicating with Indigenous Groups. Kiwetinohk will</p>

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		<p>ask for input from these groups on the plan and may invite them to participate in emergency response drills if needed.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>Kiwetinohk is committed to hiring local staff, which will support the region through property taxes and funding for services such as healthcare. During construction, Kiwetinohk plans to mitigate the impact of its workforce on local health services by providing emergency medical services on-site and using STARS air ambulance for additional care. Kiwetinohk will also work with Indigenous Groups, healthcare providers, local officials, and other stakeholders to plan and reduce the impact of its workforce on healthcare, 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>To check for potential impacts to historical resources, the Project area is first searched through the 'Alberta Listing of Historic Resources' (the 'Listing'), a tool that helps determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> • Archaeological sites • Paleontological sites • Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.) • Historic structures <p>The Listing provides early warnings about potential historical resource concerns, guiding Project planning. It helps developers determine if they need to apply for approval under the <i>Historic Resources Act</i>.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure, including protocols on discovery of items of historical, archaeological, paleontological, or architectural significance.</p> <p><i>Increased Wind and Erosion</i></p> <p>The BBPP is situated in an area with a lack of watercourses and significant slopes, which means the risk of erosion is expected to be limited to the site itself. To manage this, Kiwetinohk plans to implement erosion control measures, such as using vegetation and matting where necessary. Additionally, dust suppression measures will be used to further manage potential environmental impacts.</p>

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		<p><i>Presence of Environmental Monitors</i></p> <p>Some Indigenous Groups have indicated they would like to have environmental monitors present. Kiwetinohk plans to include various levels of environmental monitoring throughout the Project's lifecycle. This includes pre-disturbance assessments and consultation. During construction, environmental monitors will focus on soil and vegetation management, wildlife monitoring, and ensuring restricted access periods are respected. During operation, following final Project approval, Kiwetinohk will follow a detailed monitoring schedule, including air quality checks, wastewater management, land conservation, groundwater and soil monitoring, and a plan for decommissioning and land restoration once the Project is completed.</p> <p><i>Risk to Women</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 and 13% of Canada's construction workforce. Energy and construction jobs are well paid, but the construction sector is predominantly male.</p> <p>During its construction phase, Kiwetinohk expects about 85-90% of workers will be male, living temporarily near the site in hotels or worker camps. This creates potential risks for women, including human trafficking, particularly for Indigenous women and younger women in service industries.</p> <p>To address these risks, Kiwetinohk plans to collaborate with Indigenous Groups, local communities, and contractors to create strategies that reduce these dangers. This includes:</p> <ul style="list-style-type: none"> • Engaging with local communities and Indigenous Groups to raise awareness and develop plans to reduce interaction between vulnerable populations and mobile workers. • Educating mobile workers about the risks Indigenous women face, the history of colonialism, and how to identify and report violence or human trafficking. • Partnering with experts to provide resources for women facing violence or trafficking. • Offering training and economic opportunities for local women to increase gender diversity on the Project site. • Encouraging contractors to hire more women, especially local Indigenous women, to promote economic inclusion. • Enforcing a zero-tolerance policy for harassment and violence in the workplace, including in accommodations and catering areas. • Increasing supervision in worker camps, accommodation areas, and communities where mobile workers are present. <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>During the operational phase, Kiwetinohk expects most of its workforce to be local. Kiwetinohk already recruits, trains, and employs</p>

Issues	Registry Comment Number	Response
		<p>local Indigenous people through an operator trainee program that provides training and work experience in the field of well operations. If the BBPP is approved, Kiwetinohk plans to expand this program to include BBPP trainees, with the goal of creating long-term local employment opportunities.</p> <p><i>Location of the Proposed Gas Pipelines</i></p> <p>Indigenous Groups want to know which of two potential routes will be used for the BBPP. Currently, no decision has been made respecting the routing. Both of the routes aim to follow existing disturbances where possible. Only one route will be chosen, and a separate application will be submitted to the Alberta Energy Regulator (AER) for the selected route. Kiwetinohk will engage with interested Indigenous Groups once the application is made to the AER.</p> <p><i>Location of Proposed Powerline</i></p> <p>Three potential transmission line routes have been selected by ATCO, which will manage the transmission line permitting. However, only the preferred route will be constructed. ATCO will select the preferred route and manage the permitting process through the Alberta Electric System Operator (AESO) and the Alberta Utilities Commission (AUC).</p> <p><i>Carbon Capture and Storage</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. The timing of this depends on various factors such as technology development, economics, ongoing policy and regulatory updates, and support from Indigenous Groups and other stakeholders.</p> <p><i>BBPP megawatt (MW) output.</i></p> <p>There is a concern that the size of the BBPP is over 200 MW. However, the 200 MW size is not regulatory limit restricting the size of natural gas power plant that can be constructed and operated in Canada; it simply marks the size at which a project must undergo federal review by the Impact Assessment Agency of Canada (IAAC).</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-</p>

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		<p>cooled surface condenser for the steam turbine, which greatly reduces the water usage and reduces the need for both a large reliable source with availability year-round, and a large storage pond.</p> <p>Kiwetinohk expects that the BBPP, if built as planned, will be one of the most efficient natural gas-fired power plants in Alberta in terms of water use and carbon dioxide emissions per megawatt. The electricity it generates will have lower emissions compared to the current average emissions in Alberta, based on 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 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>In short, the BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' (AEPA) air, water, and land regulations, the BBPP is expected to have less than non-negligible impacts on the 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 mitigated during construction and operations.</p>
<p>Indigenous Peoples' Physical and Cultural Heritage and any Structure, Site, or Thing of Historical, Archaeological, Paleontological, or Architectural Significance</p>		
<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</p>	<p>11, 17, Alexis Nakota Sioux Nation</p>	<p>The vegetation assessment at the BBPP site did not identify any signs of plant gathering or plant species at risk. The plant species present are common to the area. Through engagement, Kiwetinohk learned some plant species used traditionally by Indigenous Groups are found on the site, however there is no evidence they are being gathered there. If the BBPP is approved, Kiwetinohk plans 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 use, an Indigenous Group has mentioned that the BBPP site may be less valuable for gathering plants compared to other areas. As a result, 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</p>

Issues	Registry Comment Number	Response
to address these effects.		<p>negligible.</p> <p>Currently, there are no identified sites or structures of historical, archaeological, paleontological, or architectural significance in the BBPP area.</p> <p>To check for potential impacts to historical resources, the Project area is first searched through the 'Alberta Listing of Historic Resources' (the 'Listing'), a tool that helps determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> • Archaeological sites • Paleontological sites • Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.) • Historic structures <p>The Listing provides early warnings about potential historical resource concerns, guiding Project planning. It helps developers determine if they need to apply for approval under the <i>Historic Resources Act</i>.</p>
Other Factors that IAAC Considers Relevant		
15. Clarify when carbon capture and storage technology will be operational in relation to the Project's proposed timelines.	16	<p>To comply with the federal Clean Electricity Regulations (CER), which will limit greenhouse gas emissions from natural gas plants starting in 2035, Kiwetinohk has designed the BBPP to accommodate carbon capture equipment. They are also exploring the Black Bear Carbon Hub as a potential site for safely storing the captured carbon dioxide. The decision to install carbon capture equipment will depend on finding safe and cost-effective options for carbon dioxide storage and use.</p> <p>Kiwetinohk plans to decide whether to move forward with carbon capture at the BBPP before 2035. This decision will be influenced by ongoing advancements in carbon capture technology, economics, regulations, carbon credit prices, and support from Indigenous Groups and other stakeholders. If the Black Bear Carbon Hub is not suitable, Kiwetinohk may consider other options, such as transporting the carbon dioxide to another location 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	18, 17, IAAC	<p>To comply with the federal Clean Electricity Regulations (CER), which will limit greenhouse gas emissions from natural gas plants starting in 2035, Kiwetinohk has designed the BBPP to accommodate carbon capture equipment. They are also exploring the Black Bear Carbon Hub as a potential site for safely storing the captured carbon dioxide. The decision to install carbon capture equipment will depend on finding safe and cost-effective options for carbon dioxide storage and use.</p> <p>Kiwetinohk plans to decide whether to move forward with carbon capture at the BBPP before 2035. This decision will be influenced by ongoing advancements in carbon capture technology, economics, regulations, carbon credit prices, and support from Indigenous Groups and other stakeholders. If the Black Bear Carbon Hub is not suitable, Kiwetinohk may consider other options, such as transporting the carbon dioxide to another location for storage or use.</p> <p>The Intergovernmental Panel on Climate Change indicates that carbon dioxide stored in geological reservoirs is very likely to remain</p>

Issues	Registry Comment Number	Response
<p>pipelines that may be required for the Project with and without the hub, including length and routing options.</p>		<p>there for over 1,000 years. If the Black Bear Carbon Hub is chosen, Kiwetinohk will need to implement a rigorous measurement, monitoring, and verification (MMV) program to ensure the carbon dioxide is safely stored underground, as required by the Government of Alberta regulations that specify the requirements for MMV programs.</p> <p>However, carbon capture equipment will not be installed at the BBPP site until a final decision is made about whether to proceed with carbon capture and storage, which will depend on technological, regulatory, and economic factors. The decision to invest in these facilities will be made between BBPP approval and 2035, assuming emissions regulations are in place and carbon capture becomes economically viable.</p> <p>Once the final investment decision is taken, if the carbon capture facilities are built, they will comply with safety requirements and environmental regulations. Kiwetinohk follows a lifecycle approach to regulatory planning for carbon sequestration, covering everything from site selection to closure and post-closure.</p> <p>Since the BBPP would supply about 65% of the carbon dioxide for the Black Bear Carbon Hub, the Hub is unlikely to proceed without the BBPP. At this stage, the economics of the Hub and its potential locations for infrastructure are still being assessed. Kiwetinohk cannot yet predict the specific pipeline requirements or the ownership structure for the carbon capture facilities, pipelines, or the Hub.</p> <p>The BBPP application includes carbon capture facilities, and any potential impacts within federal jurisdiction are captured as part of the overall provincial and federal regulatory applications. If the Black Bear Carbon Hub proceeds, it will follow a separate regulatory process under Alberta's jurisdiction. This will involve compliance with several Alberta regulations, including the <i>Mines and Minerals Act</i>, the <i>Oil and Gas Conservation Act</i>, the <i>Water Act</i>, and other related directives from the Alberta Energy Regulator. These regulations cover various aspects of carbon capture, such as pipeline transportation, drilling, injection, measurement, monitoring, and closure, as well as requirements for stakeholder engagement, emergency response, and reclamation. Additionally, Indigenous groups will be engaged in the planning and development of the Black Bear Carbon Hub.</p>
<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>Carbon capture equipment will not be installed at the BBPP site until a final decision is made about whether to proceed with carbon capture and storage, which will depend on technological, regulatory, and economic factors. The decision to invest in these facilities will be made between BBPP approval and 2035, assuming emissions regulations are in place and carbon capture becomes economically viable.</p> <p>Once the final investment decision is taken, if the carbon capture facilities are built, they will comply with safety requirements and environmental regulations. Kiwetinohk follows a lifecycle approach to regulatory planning for carbon sequestration, covering everything from site selection to closure and post-closure.</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															
Accidents and Malfunctions																	
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. 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="930 873 2174 1424"> <thead> <tr> <th data-bbox="930 873 1346 938">Risk / Effects</th> <th data-bbox="1346 873 1763 938">Mitigation</th> <th data-bbox="1763 873 2174 938">Project Phase</th> </tr> </thead> <tbody> <tr> <td data-bbox="930 938 1346 1068">Erosion <ul style="list-style-type: none"> Sediment into the watercourse </td> <td data-bbox="1346 938 1763 1068"> <ul style="list-style-type: none"> Geotechnical assessment Matting Vegetation </td> <td data-bbox="1763 938 2174 1068"> <ul style="list-style-type: none"> Construction Operation End of life </td> </tr> <tr> <td data-bbox="930 1068 1346 1198">Spills <ul style="list-style-type: none"> Contamination of soil, water, air </td> <td data-bbox="1346 1068 1763 1198"> <ul style="list-style-type: none"> Spill prevention Secondary containment Spill monitoring Spill response plan </td> <td data-bbox="1763 1068 2174 1198"> <ul style="list-style-type: none"> Construction Operation End of life </td> </tr> <tr> <td data-bbox="930 1198 1346 1360">Natural gas release (e.g. pipeline rupture) <ul style="list-style-type: none"> Contamination of soil, water, air Human health </td> <td data-bbox="1346 1198 1763 1360"> <ul style="list-style-type: none"> Ground disturbance code of practice Emergency response plan Air monitoring </td> <td data-bbox="1763 1198 2174 1360"> <ul style="list-style-type: none"> Operations </td> </tr> <tr> <td data-bbox="930 1360 1346 1424">Fire <ul style="list-style-type: none"> Contamination of soil, </td> <td data-bbox="1346 1360 1763 1424"> <ul style="list-style-type: none"> Air monitoring Emergency response </td> <td data-bbox="1763 1360 2174 1424"> <ul style="list-style-type: none"> Construction Operation </td> </tr> </tbody> </table>	Risk / Effects	Mitigation	Project Phase	Erosion <ul style="list-style-type: none"> Sediment into the watercourse 	<ul style="list-style-type: none"> Geotechnical assessment Matting Vegetation 	<ul style="list-style-type: none"> Construction Operation End of life 	Spills <ul style="list-style-type: none"> Contamination of soil, water, air 	<ul style="list-style-type: none"> Spill prevention Secondary containment Spill monitoring Spill response plan 	<ul style="list-style-type: none"> Construction Operation End of life 	Natural gas release (e.g. pipeline rupture) <ul style="list-style-type: none"> Contamination of soil, water, air Human health 	<ul style="list-style-type: none"> Ground disturbance code of practice Emergency response plan Air monitoring 	<ul style="list-style-type: none"> Operations 	Fire <ul style="list-style-type: none"> Contamination of soil, 	<ul style="list-style-type: none"> Air monitoring Emergency response 	<ul style="list-style-type: none"> Construction Operation
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Acoustic Environment				
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 levels were modeled at their highest to ensure they stay within acceptable limits. Noise emissions would not exceed the permissible sound levels. During construction, operation, and decommissioning, noise will be managed to avoid disturbing wildlife and migratory birds. Most construction work would happen during the day to reduce nighttime noise.</p> <p>To avoid conflicts and complaints, Kiwetinohk would seek engagement with local Indigenous Groups to discuss emergency responses, wildlife and environmental reporting, and to schedule activities in a way that avoids conflicts. They will also seek input on their Complaint Resolution Plan (CRP).</p> <p>The CRP will outline Kiwetinohk's process for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP will include:</p> <ul style="list-style-type: none"> An online portal for people to submit questions or concerns about the BBPP. A process to handle concerns and complaints quickly and transparently. Investigation of complaints and taking action to fix problems if needed. Resolving issues in a timely manner. Learning from past experiences to reduce the Project's impact on the community. <p>The CRP will:</p> <ol style="list-style-type: none"> Record all inquiries, comments, and complaints. Track responses to these concerns. 		

Issues	Registry Comment Number	Response
		<p>3. Help with data collection and reporting. 4. Document communications and notifications. 5. Assist the Project team in managing issues. 6. Work to resolve any concerns.</p> <p>Kiwetinohk will respond to inquiries or complaints in a way that suits the type of inquiry, which may include:</p> <ul style="list-style-type: none"> • Meetings in person. • Telephone calls. • Emails; or, • Letters. <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p>
Alternative Means of Carrying Out the Project		
21. Consider the use of alternative and more environmentally friendly energy sources to supply fuel for the Project.	7, 21	<p>Kiwetinohk has considered alternatives to the BBPP, but none are technically or economically feasible for the following reasons:</p> <ol style="list-style-type: none"> 1. Wind Power: To generate the required 400 MW, around 100 wind turbines would be needed, causing significant land disturbance (about 200 hectares). Additionally, an appropriate wind resource is necessary, and site-specific data on wind speed and direction would need to be gathered over several years. This makes wind power not viable for this project. 2. Solar Power: Solar power would require around 1,066 hectares of land to generate 400 MW, but most of the land is forested, requiring significant clearing. Additionally, solar power projects require suitable solar conditions and land availability, and Alberta's regulations currently don't allow renewable energy projects on Crown Land, which is where the BBPP is located. 3. Nuclear Power: There are no nuclear plants in Alberta, and the regulatory, financial, and technical challenges make this option unfeasible for Kiwetinohk. <p>In summary, the BBPP remains the most feasible option due to land and regulatory constraints for other energy sources.</p>
22. Request that additional information be provided regarding the emissions intensity of facilities that utilize similar technologies as the Project to	16	<p>The BBPP's main environmental concern is the emission of nitrogen oxides (NO_x) from burning natural gas. Other secondary emissions include carbon monoxide (CO), fine particulate matter (PM_{2.5}), and total suspended particulates (TSP). Ammonia (NH₃) may also be produced from the BBPP.</p>

Issues	Registry Comment Number	Response
verify the emissions intensity predicted for the Project.		<p>Air quality modeling was done to ensure the BBPP's emissions meet Alberta's air quality standards. The results show that predicted levels of NO₂, CO, PM_{2.5}, TSP, and NH₃ comply with the <i>Alberta Ambient Air Quality Objectives (AAAQOs)</i>.</p> <p>The BBPP was approved by the Alberta government in September 2024 (Approval No.: 495201-00-00), with conditions for continuous emissions monitoring for emissions intensity and annual reporting to ensure compliance with air quality standards. Kiwetinohk expects the BBPP to be one of the most efficient natural gas power plants in Alberta, with lower carbon dioxide emissions than the provincial average.</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.	21, 12	<p>Three potential transmission line routes have been selected by ATCO, which will manage the transmission line permitting. However, only the preferred route will be constructed. ATCO will select the preferred route and manage the permitting process through the Alberta Electric System Operator (AESO) and the Alberta Utilities Commission (AUC).</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 and engagement 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 plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure, including interim and end-of-life pipeline and transmission line right-of-way restoration and reclamation.</p>
Atmospheric Environment		
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	20, 12	<p>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 and Protected Areas. The <i>Canadian Ambient Air Quality Standards (CAAQS)</i> were considered in the Emissions Intensity Report, 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.</p>

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activities and components. Address the inconsistencies in air quality modelling between Appendix N and Appendix O in the Initial Project Description.																																
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="913 581 1663 792"> <thead> <tr> <th colspan="2"></th> <th colspan="4">CAAQS¹</th> </tr> <tr> <th colspan="2"></th> <th colspan="2">2020²</th> <th colspan="2">2025</th> </tr> <tr> <th colspan="2"></th> <th>ppb</th> <th>ug/m³</th> <th>ppb</th> <th>ug/m³</th> </tr> </thead> <tbody> <tr> <td>NO₂</td> <td>1 hour</td> <td>60</td> <td>112.8</td> <td>42</td> <td>78.96</td> </tr> <tr> <td>NO₂</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 NO₂ 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/m³ while the CAAQS (2025) 1-hour values are 78.96 ug/m³. The predicted annual MGLC is 9.5 ug/m³ while the CAAQS (2025) annual values are 22.56 ug/m³. The results indicate that the 1-hour predicted MGLC exceeds the CAAQS but the annual predicted MGLC do not.</p>			CAAQS ¹						2020 ²		2025				ppb	ug/m ³	ppb	ug/m ³	NO ₂	1 hour	60	112.8	42	78.96	NO ₂	Annual	17	31.96	12	22.56
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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	<p>Air quality modeling for the BBPP was done using the U.S. EPA's CALPUFF dispersion model, following Alberta's air quality guidelines. The plant is located within the West Central Airshed Society (WCAS), and air monitoring data for nitrogen dioxide (NO₂), carbon monoxide (CO), ammonia (NH₃), and fine particles (PM_{2.5}) were used from the nearest available stations. Alberta Environment and Protected Areas (AEPA) reviewed the air quality assessment and approved the BBPP on September 8, 2024, with no comments about the monitoring stations used.</p>																														

¹ <https://ccme.ca/en/air-quality-report>

² Conversion of ppb to ug/m³ using the WHO conversion at 25 degrees Celsius and 1013mb: 1 ppb = 1.88 ug/m³

Issues	Registry Comment Number	Response
Climate Change and Greenhouse Gas Emissions		
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	<p>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.</p> <p>If the federal Clean Electricity Regulations are finalized, which is expected in early 2025, the BBPP will be required to comply with those emissions requirements.</p>
28. Clarify the length of time that the Project is predicted to emit greenhouse gases (GHG) 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 scenarios). As a result, the predicted GHG emissions are likely higher than actual and would not be expected to exceed the allowable CO _{2e} 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	<p>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.</p> <p>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.</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 depends on wide range of factors including technology commercialization, economics, continued policy and regulatory development, and Indigenous and stakeholder support.</p>
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 _{2e} and 1,445,685 tCO _{2e} (based on anticipated fuel use), respectively.

Issues	Registry Comment Number	Response
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, 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: https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/clean-electricity-regulation.html)</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 plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p> <p>Some Indigenous Groups have shown interest in conducting traditional land use studies to understand the effects of the BBPP on current and traditional land uses. If the Project is approved, Kiwetinohk would continue working with these Indigenous Groups to define the study's scope, including who will participate, and the study's guidelines. Kiwetinohk is also open to helping fund part of the study, along with other partners such as the 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>The BBPP site may face operational challenges due to extreme weather, such as heavy snowfall, rainfall, wildfires, and temperature fluctuations. These conditions could cause damage to equipment, delay operations, and pose safety risks to workers. The BBPP is near forests, so wildfires could cause significant downtime or damage. Severe weather may also disrupt the transportation of natural gas, power, and supplies. However, Kiwetinohk has emergency plans to address these risks while prioritizing worker safety.</p> <p>The BBPP is not located in an area with water shortages. The design of the facility minimizes the need for water from the Freeman River, using recycled water instead. The facility will store an initial 4545 m³ of water, which will be reused throughout operations. If water sources are limited, the BBPP can store water in advance or purchase water as needed.</p> <p>A stormwater pond is designed to manage runoff from heavy storms, with a capacity to handle a 100-year storm event. The BBPP site is not at high risk of flooding.</p>
Cumulative Effects		
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	18, 11, 20	<p>Given the localized and reversible effects of the BBPP, impact to cumulative environmental effects is anticipated to be negligible.</p> <p>The BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' (AEPA) air, water, and land regulations that consider cumulative impacts, the BBPP is expected to have less than non-negligible impacts on the traditional use of</p>

Issues	Registry Comment Number	Response
<p>affect public and Indigenous peoples' health and impact on Indigenous peoples' rights.</p>		<p>resources in the area.</p> <p>Kiwetinohk is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO). 4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities. 5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted. 6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator. <p>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta's regulatory requirements to support the Project's environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide internal seasonal wildlife training as well as bulletins and observation forms. This will include focusing on species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, including managing attractants such as garbage, tracking wildlife observations, and using best practices to prevent issues with wildlife.</p>

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		<p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it's confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible. <p>Vegetation and Traditional Use: The vegetation assessment at the BBPP site did not identify any signs of plant gathering or plant species at risk. The plant species present are common to the area. Through engagement, Kiwetinohk learned some plant species used traditionally by Indigenous Groups are found on the site, however there is no evidence they are being gathered there. If the BBPP is approved, Kiwetinohk plans 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 use, an Indigenous Group has mentioned that the BBPP site may be less valuable for gathering plants compared to other areas. As a result, the BBPP is not expected to impact Indigenous use of traditional plants.</p> <p>Traditional Land Use: Indigenous Groups in the region engage in hunting, fishing, trapping, and cultural activities. Kiwetinohk has not identified any traditional use of the proposed BBPP site, which has already been disturbed by logging and other industrial activities and may not be as valuable for gathering as other areas nearby.</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 have shown interest in conducting traditional land use studies to understand the effects of the BBPP on current and traditional land uses. If the Project is approved, Kiwetinohk would continue working with these Indigenous Groups to define the study's scope, including who will participate, and the study's guidelines. Kiwetinohk is also open to helping fund part of the study, along with other partners such as the government and industry.</p> <p>Noise: The BBPP is located in a busy industrial area with no nearby homes. Noise levels were modeled at their highest to ensure they stay within acceptable limits. Noise emissions would not exceed the permissible sound levels. During construction, operation, and</p>

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		<p>decommissioning, noise will be managed to avoid disturbing wildlife and migratory birds. Most construction work would happen during the day to reduce nighttime noise.</p> <p>To avoid conflicts and complaints, Kiwetinohk would seek engagement with local Indigenous Groups to discuss emergency responses, wildlife and environmental reporting, and to schedule activities in a way that avoids conflicts. They will also seek input on their Complaint Resolution Plan (CRP).</p> <p>The CRP will outline Kiwetinohk's process for receiving, recording, investigating, resolving, and reporting inquiries or complaints.</p> <p>The CRP will include:</p> <ul style="list-style-type: none"> • An online portal for people to submit questions or concerns about the BBPP. • A process to handle concerns and complaints quickly and transparently. • Investigation of complaints and taking action to fix problems if needed. • Resolving issues in a timely manner. • Learning from past experiences to reduce the Project's impact on the community. <p>The CRP will:</p> <ol style="list-style-type: none"> 1. Record all inquiries, comments, and complaints. 2. Track responses to these concerns. 3. Help with data collection and reporting. 4. Document communications and notifications. 5. Assist the Project team in managing issues. 6. Work to resolve any concerns. <p>Kiwetinohk will respond to inquiries or complaints in a way that suits the type of inquiry, which may include:</p> <ul style="list-style-type: none"> • Meetings in person. • Telephone calls. • Emails; or, • Letters. <p>Concerns about economic development opportunities, both current and future:</p> <ul style="list-style-type: none"> • <i>Loss of access to resources on the BBPP site</i> – Kiwetinohk is not aware of any current or future economic use of the BBPP site by Indigenous Groups. The timber rights for the land are held by Blue Ridge Lumber, therefore no Indigenous person(s) would likely be allowed to remove timber for commercial sale. Since the land is owned by the Government of Alberta, anyone wanting to use it commercially would need to obtain a surface lease, but no such leases have been applied for at the time of the application. Oil and gas rights are owned by different companies, so there are no subsurface rights available for the BBPP

Issues	Registry Comment Number	Response
		<p>lands. The BBPP site vegetation assessment did not identify any evidence of plant gathering or plant species at risk.</p> <ul style="list-style-type: none"> • <i>Economic opportunities associated with site development</i> – If the BBPP receives approval, Indigenous people may have economic opportunities through training, employment, or business contracts, similar to the opportunities Kiwetinohk has provided in its oil and gas operations in the region. <p>Kiwetinohk supports Indigenous training, employment, contracting, and economic development in several ways:</p> <ol style="list-style-type: none"> 1. Indigenous Operator Trainee Program: Kiwetinohk recruits and trains local Indigenous people in well operations. If the BBPP is approved, Kiwetinohk would seek to expand the program to include BBPP operator trainees, with the goal of providing long-term local employment. 2. Business Loans: Kiwetinohk offers small business loans to Indigenous companies and individuals through the Indian Business Corporation, focusing on businesses in Kiwetinohk’s operational areas. This program could also benefit local Indigenous businesses near the BBPP. 3. Economic Participation: Kiwetinohk is committed to supporting local Indigenous and local economic development. If an Engineering, Procurement, and Construction (EPC) contractor is hired for the BBPP construction, Kiwetinohk will require the contractor to create a plan to include local Indigenous businesses in procurement, contracting, training, and employment. 4. Prequalification Tool: Kiwetinohk uses a tool where Indigenous companies can register for contracting opportunities. It also keeps a list of community-based contractors and suppliers, ensuring Indigenous providers are included in the bidding process. 5. Guidance for Local Providers: Kiwetinohk would guide local individuals and service providers to understand the pre-qualification requirements for contracting, procurement, and employment opportunities related to the BBPP. 6. Workforce Development: During the construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs and explore opportunities to build local skills through training and mentorship. Kiwetinohk may suggest training institutions and service providers to support this development. <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>

Issues	Registry Comment Number	Response
		<p><i>Process and Occupational Safety at the BBPP</i></p> <p>The BBPP is designed with high safety standards, will be operated by trained personnel, and will have emergency response equipment. Kiwetinohk plans to get third-party certification for its health, safety, and environmental system to verify the BBPP's safety program and procedures.</p> <p><i>Emergency Response, Communication and Notification</i></p> <p>The BBPP will have an emergency response plan that includes notifying and communicating with Indigenous Groups. Kiwetinohk will ask for input from these groups on the plan and may invite them to participate in emergency response drills if needed.</p> <p><i>Potential Impacts on Local Health Care Services</i></p> <p>Kiwetinohk is committed to hiring local staff, which will support the region through property taxes and funding for services such as healthcare. During construction, Kiwetinohk plans to mitigate the impact of its workforce on local health services by providing emergency medical services on-site and using STARS air ambulance for additional care. Kiwetinohk will also work with Indigenous Groups, healthcare providers, local officials, and other stakeholders to plan and reduce the impact of its workforce on healthcare, public safety, vulnerable populations, and social services.</p> <p><i>Youth</i></p> <p>Kiwetinohk has not yet specifically engaged with Indigenous Groups' youth. If the BBPP is approved, Kiwetinohk will seek to:</p> <ul style="list-style-type: none"> • Work with Indigenous Group leadership to identify and communicate the needs and interests of youth • Share BBPP information, including training and job opportunities, with youth • Provide BBPP information and opportunities online, including engagement via social media • Explore creating training programs targeted at younger people similar to Kiwetinohk's existing, Indigenous Operator Training Program • Receive advice from Indigenous Groups as to how best to engage with and support Indigenous youth. • Develop youth-focused programs, similar to the one Kiwetinohk is doing with the University of Alberta Golden Bears hockey team, which gives Indigenous youth the chance to attend games and learn about education programs, including Indigenous student initiatives, while also participating in sports and activities. <p><i>Cultural Heritage</i></p> <p>Currently, there are no identified sites or structures of historical, archaeological, paleontological, or architectural significance in the</p>

Issues	Registry Comment Number	Response
		<p>BBPP area.</p> <p>To check for potential impacts to historical resources, the Project area is first searched through the 'Alberta Listing of Historic Resources' (the 'Listing'), a tool that helps determine if a proposed development might affect historic resources, including:</p> <ul style="list-style-type: none"> • Archaeological sites • Paleontological sites • Indigenous traditional use sites of a historic resource nature (burials, ceremonial sites, etc.) • Historic structures <p>The Listing provides early warnings about potential historical resource concerns, guiding Project planning. It helps developers determine if they need to apply for approval under the <i>Historic Resources Act</i>.</p>
Drinking Water		
<p>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.</p>	<p>20</p>	<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 reduce 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>
Economic Conditions		
<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>	<p>16</p>	<p>The initial estimate for the value added by the project of \$400 million was based on early cost estimates for building the combined cycle power plant, including equipment, construction, and management. These estimates are provided by Black and Veatch and are confidential.</p> <p>Kiwetinohk is still analyzing costs and will provide more details as the project progresses, including when the design is completed and equipment is chosen.</p> <p>The estimated cost for on-site operating labor is about \$36 million (\$1.22 million per year), though this could vary based on labour market conditions.</p> <p>The projected property tax benefit over the 30-year life of the Project is expected to be around \$126 million (\$4.2 million per year), but this will depend on final capital costs and other factors.</p> <p>Operating costs are estimated to be about \$300 million, with variables such as carbon taxes, commodity prices, and labor rates affecting the final amount.</p>

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		The specific economic impacts on the local, provincial, and national levels will depend on future decisions about contracts and procurement, which have not yet been made.
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.	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>
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 plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure. Additional studies will be considered under the ongoing engagement process and informed by Indigenous Groups participating.

Issues	Registry Comment Number	Response
Fish and Fish Habitat		
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.
Indigenous Knowledge		
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 negligible.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, 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>
Indigenous Peoples' Rights		
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	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 plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p>

Issues	Registry Comment Number	Response
Indigenous groups.		
Indigenous Peoples' Social and Economic Conditions		
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, Indigenous people may have economic opportunities through training, employment, or business contracts, similar to the opportunities Kiwetinohk has provided in its oil and gas operations in the region. Please see the response to number 46 below for a more complete description of these opportunities. Different Indigenous Groups have varying skills and abilities, along with their own or affiliated companies that can offer goods and services. Those that are closest to the project will likely have an advantage in competing for contracts and other opportunities because of their proximity to the necessary equipment and supplies.</p> <p>Kiwetinohk is currently unable to break down data on the socio-economic conditions of Indigenous peoples but will continue to work with Indigenous Groups to assess the potential socio-economic impact on their communities. If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, including socio-economic interests and concerns, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p>
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.</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 and 13% of Canada's construction workforce. Energy and construction jobs are well paid, but the construction sector is predominantly male. 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"> • 5% of people identified as Indigenous, including First Nations and Métis heritage • 25% of people identified as female and 66% as male. • Non-binary and two-spirited representation • 12% identify as having a disability • People identified as members of the 2SLGBTQ+ communities

Issues	Registry Comment Number	Response
		<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>The BBPP offers mostly full-time administration, operation, construction, and maintenance roles that require technical training, which can be gained through experience or formal education. Some roles also require physical abilities for safety. Kiwetinohk focuses on providing ongoing training and development for its employees. Kiwetinohk aims to increase Indigenous representation in its workforce through its operator trainee program and is open to partnering with schools and other learning initiatives to boost diversity in its workforce.</p> <p>Kiwetinohk’s Indigenous operator trainee program has an 85% retention rate in the first two years, with one female participant leaving the program for a full-time job, which she credited to the experience gained through Kiwetinohk. Kiwetinohk finds that there are qualified Indigenous candidates in the region, including women, and sees opportunities to increase this number by engaging with K-12 schools and raising awareness of available opportunities.</p> <p>Kiwetinohk provides competitive pay, health benefits, and diversity training, and measures the retention of Indigenous, female, and other underrepresented groups. This approach has led to strong retention rates of Indigenous, female and other diverse teammembers. Kiwetinohk believes hiring local staff is key to strong performance and safety.</p> <p>Additionally, the BBPP will create indirect jobs, such as in construction to meet housing demands and in food service and retail due to increased local spending by workers.</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 economic development in several ways:</p> <ol style="list-style-type: none"> 1. Indigenous Operator Trainee Program: Kiwetinohk recruits and trains local Indigenous people in well operations. If the BBPP is approved, Kiwetinohk would seek to expand the program to include BBPP operator trainees, with the goal of providing long-term local employment. 2. Business Loans: Kiwetinohk offers small business loans to Indigenous companies and individuals through the Indian Business Corporation, focusing on businesses in Kiwetinohk’s operational areas. This program could also benefit local Indigenous businesses near the BBPP. 3. Economic Participation: Kiwetinohk is committed to supporting local Indigenous and local economic development. If an Engineering, Procurement, and Construction (EPC) contractor is hired for the BBPP construction, Kiwetinohk will require the contractor to create a plan to include local Indigenous businesses in procurement, contracting, training, and employment. 4. Prequalification Tool: Kiwetinohk uses a tool where Indigenous companies can register for contracting opportunities. It also

Issues	Registry Comment Number	Response
		<p>keeps a list of community-based contractors and suppliers, ensuring Indigenous providers are included in the bidding process.</p> <p>5. Guidance for Local Providers: Kiwetinohk would guide local individuals and service providers to understand the pre-qualification requirements for contracting, procurement, and employment opportunities related to the BBPP.</p> <p>6. Workforce Development: During the construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs and explore opportunities to build local skills through training and mentorship. Kiwetinohk may suggest training institutions and service providers to support this development.</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 plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p> <p>If desired and appropriate, Kiwetinohk would discuss with Indigenous Groups about specific demographical approaches, ways to reduce impacts, and benefits, as part of its ongoing engagement process. Kiwetinohk will consider the impact and opportunities for these groups from a demographic perspective, but any decisions regarding the data will be controlled by the Indigenous Groups involved.</p>
<p>48. Provide additional information regarding the benefits of the proposed Indigenous micro-loan program.</p>	<p>10</p>	<p>Kiwetinohk has provided \$100,000 to fund the Kiwetinohk Indigenous Microloan Program (Program), which is managed by the Indian Business Corporation (IBC). This program is available to members of Indigenous Groups whose traditional lands are in Kiwetinohk's areas of operation. In early 2023, Kiwetinohk shared information about the program with 17 Indigenous Groups, including those involved in the BBPP.</p> <p>Applicants can receive loans up to \$10,000, which must be repaid to IBC. This allows the funds to be reinvested and used for future loans in the community. The goal of the program is to provide accessible funding, build business skills, 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>

Issues	Registry Comment Number	Response
Navigation		
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.	9	<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.</p> <p>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>
Species at Risk, Terrestrial Wildlife, and their Habitat		
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.	8, 17, 12	<p>The BBPP has been carefully planned to avoid harming the environment, through site selection, engineering and design to operations and closure planning.</p> <p>Given these mitigation measures, and compliance with Alberta Environment and Protected Areas' air, water, and land regulations, the BBPP is expected to have less than non-negligible impacts on the traditional use of resources in the area.</p> <p>Kiwetinohek is taking steps to mitigate the environmental impact of the Project in various ways:</p> <ol style="list-style-type: none"> 1. Site Selection: The BBPP site was chosen in a previously disturbed area with heavy industrial activity (e.g. logging and oil and gas), which helps avoid affecting areas that are more valuable for wildlife or activities such as hunting and fishing. 2. Water Usage and Protection: The Project plans to use groundwater and process water to supply the facility and will only divert water from the Freeman River if necessary. A study completed shows the river can handle the diversion without harming fish or fish habitat. Any diversion will be carefully controlled by Alberta's environmental regulations. 3. Water Intake and Fish Protection: The water intake from the Freeman River will be under the surface and won't block navigation or require permanent structures in the water. Fish protection measures will be followed, and the intake will be built only after proper approvals and under strict conditions, following all regulatory review and under permit from the Department of Fisheries and Oceans (DFO). 4. Water Runoff and Wastewater: There are no watercourses within or immediately adjacent to the Project. Any surface water runoff will be managed through a stormwater pond and will either be safely released or disposed of at an approved site. Wastewater will also be disposed of at approved facilities. 5. Wetlands: A small seasonal wetland will be lost during construction of the Project. A detailed report will be created to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. No other wetlands nearby are expected to be impacted.

Issues	Registry Comment Number	Response
		<p>6. Transmission Lines and Pipelines: The transmission line will not cross any watercourses, and the pipeline will be installed underground using directional drilling to avoid disturbing the land or affecting fish habitats. No impacts to fish or fish habitat would occur. Once an appropriate route for the pipeline is determined, all necessary approvals will be sought from the Alberta Energy Regulator.</p> <p>Wildlife Protection: Wildlife surveys, habitat surveys, wetland and watercourse surveys were completed per the Government of Alberta’s regulatory requirements to support the Project’s environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide internal seasonal wildlife training as well as bulletins and observation forms. This will include focusing on species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, including managing attractants such as garbage, tracking wildlife observations, and using best practices to prevent issues with wildlife.</p> <p>Kiwetinohk has plans and protocols for <i>Migratory Birds Convention Act</i> (MBCA) compliance:</p> <ol style="list-style-type: none"> 1. All birds, their nests and their eggs will be protected when they are found. 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. 3. During construction and operations, Kiwetinohk will monitor migratory birds and use deterrents if necessary. If nests are found on equipment or infrastructure, they will only be removed once it’s confirmed there are no birds or eggs, and the bird species is not listed as protected under MBCA. If removal is needed, Kiwetinohk may need a permit under the Migratory Bird Regulations (MBR) 2022. 4. Lighting and noise will be carefully controlled and managed to avoid sensory disturbance to migratory birds. For example, during construction, lights at night will be minimized, downward-facing lights will be used, and motion-sensing lights will be installed where possible. Most construction will happen during daylight to reduce nighttime disturbance to birds. 5. If monitoring identifies any significant impact to a particular bird species, such as sensory disturbance or mortality, Kiwetinohk will implement an adaptive management plan to address and mitigate further effects to the greatest extent possible.
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 Project’s environmental assessment. Kiwetinohk will implement measures to protect wildlife, including monitoring during construction and ongoing monitoring during regular operations. As an experienced operator in the region, Kiwetinohk will provide internal seasonal wildlife training as well as bulletins and observation forms. This will include focusing on</p>

Issues	Registry Comment Number	Response
		species important for traditional use, species at risk (such as grizzly bear), and migratory birds. Kiwetinohk will take steps to avoid wildlife conflicts, including managing attractants such as garbage, tracking wildlife observations, and using best practices to prevent issues with wildlife.
52. Consider the development of additional mitigation measures, in consultation with Indigenous groups, to ensure project effects to wildlife are minimized, including restoration of habitat in areas adjacent to the project site or elsewhere to offset habitat loss, restoration using native plants, and monitoring of wildlife.	7	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.
Vulnerable Population Groups (GBA Plus)		
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 and 13% of Canada's construction workforce. Energy and construction jobs are well paid, but the construction sector is predominantly male.</p> <p>During its construction phase, Kiwetinohk expects about 85-90% of workers will be male, living temporarily near the site in hotels or worker camps. This creates potential risks for women, including human trafficking, particularly for Indigenous women and younger women in service industries.</p> <p>To address these risks, Kiwetinohk plans to collaborate with Indigenous Groups, non-governmental organizations, local communities, and contractors to create strategies that reduce these dangers. This includes:</p> <ul style="list-style-type: none"> • Engaging with local communities and Indigenous Groups to raise awareness and develop plans to reduce interaction between vulnerable populations and mobile workers. • Educating mobile workers about the risks Indigenous women face, the history of colonialism, and how to identify and report violence or human trafficking. • Partnering with experts to provide resources for women facing violence or trafficking. • Offering training and economic opportunities for local women to increase gender diversity on the Project site. • Encouraging contractors to hire more women, especially local Indigenous women, to promote economic inclusion.

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		<ul style="list-style-type: none"> Enforcing a zero-tolerance policy for harassment and violence in the workplace, including in accommodations and catering areas. Increasing supervision in worker camps, accommodation areas, and communities where mobile workers are present. <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>During the operational phase, Kiwetinohk expects most of its workforce to be local. Kiwetinohk already recruits, trains, and employs local Indigenous people through an operator trainee program that provides training and work experience in the field of well operations. If the BBPP is approved, Kiwetinohk plans to expand this program to include BBPP trainees, with the goal of creating long-term local employment opportunities.</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.</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 and 13% of Canada’s construction workforce. Energy and construction jobs are well paid, but the construction sector is predominantly male. 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"> 5% of people identified as Indigenous, including First Nations and Métis heritage 25% of people identified as female and 66% as male. Non-binary and two-spirited representation 12% identify as having a disability People identified as members of the 2SLGBTQ+ communities <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>The BBPP offers mostly full-time administration, operation, construction, and maintenance roles that require technical training, which</p>

Issues	Registry Comment Number	Response
		<p>can be gained through experience or formal education. Some roles also require physical abilities for safety. Kiwetinohk focuses on providing ongoing training and development for its employees. Kiwetinohk aims to increase Indigenous representation in its workforce through its operator trainee program and is open to partnering with schools and other learning initiatives to boost diversity in its workforce.</p> <p>Kiwetinohk provides competitive pay, health benefits, and diversity training, and measures the retention of Indigenous, female, and other underrepresented groups. This approach has led to strong retention rates of Indigenous, female and other diverse team members. Kiwetinohk believes hiring local staff is key to strong performance and safety.</p> <p>Additionally, the BBPP will create indirect jobs, such as in construction to meet housing demands and in food service and retail due to increased local spending by workers.</p> <p>If BBPP receives regulatory approval, Kiwetinohk will seek to establish a communication and engagement plan with Indigenous Groups whose traditional lands the Project is on, building on previous discussions. This plan will help Kiwetinohk better understand their concerns and interests, ensuring ongoing communication and engagement with these groups about environmental, economic, and social issues throughout the Project's life, from construction to closure.</p>
Water – Groundwater and Surface Water		
<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>	17	<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</p>	17, 12	<p>A small seasonal wetland exists on the site and will be lost during construction of the Project. A detailed Wetland Alteration Impact Report (WAIR) will be completed to assess the wetland's functions, and compensation will be provided as required by Alberta's Wetland Policy. Alberta Environment and Protected Areas will 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), a digital planning tool. The</p>

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implemented to offset permanent wetland loss due to the construction of the Project, such as wetland restoration and/or compensation.		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.
Other Factors that IAAC Considers Relevant		
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, Indigenous people may have economic opportunities through training, employment, or business contracts, similar to the opportunities Kiwetinohk has provided in its oil and gas operations in the region.</p> <p>In addition to ongoing need for accommodations and food services, Kiwetinohk supports local and Indigenous training, employment, contracting, and economic development in several ways:</p> <ol style="list-style-type: none"> 1. Economic Participation: Kiwetinohk is committed to supporting local Indigenous and local economic development. If an Engineering, Procurement, and Construction (EPC) contractor is hired for the BBPP construction, Kiwetinohk will require the contractor to create a plan to include local Indigenous businesses in procurement, contracting, training, and employment. 2. Prequalification Tool: Kiwetinohk uses a tool where Indigenous companies can register for contracting opportunities. It also keeps a list of community-based contractors and suppliers, ensuring Indigenous providers are included in the bidding process. 3. Guidance for Local Providers: Kiwetinohk would guide local individuals and service providers to understand the pre-qualification requirements for contracting, procurement, and employment opportunities related to the BBPP. 4. Workforce Development: During the construction and operation phases, Kiwetinohk and its contractors will engage to discuss workforce needs and explore opportunities to build local skills through training and mentorship. Kiwetinohk may suggest training institutions and service providers to support this development.
59. Provide additional information on natural gas demand requirements for	16	As per the Initial 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.

Issues	Registry Comment Number	Response
the Project.		
60. Describe planned monitoring of project facilities and pipelines to ensure safety and to minimize project effects to the environment.	21	Kiwetinohk plans to include various levels of environmental monitoring throughout the Project's lifecycle. This includes pre-disturbance assessments and consultation. During construction, environmental monitors will focus on soil and vegetation management, wildlife monitoring, and ensuring restricted access periods are respected. During operation, following final Project approval, Kiwetinohk will follow a detailed monitoring schedule, including air quality checks and membership to the West Central Airshed Society, wastewater management, land conservation, groundwater and soil monitoring, and a plan for decommissioning and land reclamation once the Project is completed.
61. Provide additional information to support production capacity estimates for the Project and the purpose of and need for the Project.	16	The BBPP is located in the Whitecourt region of Alberta because the area has the necessary infrastructure and support to host the Project. It has access to over 1,000 MW of generation capacity on the existing 240 kV transmission network, meaning there is no need to expand the transmission system for the BBPP. The location was also chosen to provide reliable power in an area where demand for electricity is higher than the current supply.
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.