

Alt-FEMP Executive Summary

Company

End Date

of sites

Torxen Energy Ltd.

December 31, 2025

757

Summary

The Torxen Energy Ltd. (Torxen) Alternative Fugitive Emissions Management Program (alt-FEMP) will leverage aerial gas mapping LiDAR (a-LiDAR) leak detection technology to rapidly screen participating sites, identify major emissions sources, and promptly prepare a response targeting high-emitting sites for close-range follow-up surveys.

The alternative program involves completing a-LiDAR surveys in Q2 2024, Q3 2024, Q2 2025, and Q3 2025 to screen the 757 sites in the alt-FEMP region. Fugitive emissions reductions will occur at top sites ranked by emissions, and it is estimated that the selected alternative program will achieve equivalent emissions reductions as compared with the *Directive 060* default approach. The alt-FEMP methodology for 757 sites is as follows:

Step 1	Screen	<p>Conduct site-level screening. The selected alternative program will deploy four screening campaigns over the course of the program:</p> <ol style="list-style-type: none">1) a-LiDAR screening, Q2 2024,2) a-LiDAR screening, Q3 2024,3) a-LiDAR screening, Q2 2025,4) a-LiDAR screening, Q3 2025, <p>The screening technology will capture both vented and fugitive emissions. Screening campaigns will occur more than three months apart.</p>
Step 2	Rank	<p>Following each a-LiDAR screening campaign, emissions will be attributed to an LSD and the LSDs will be ranked highest to lowest by their total emissions. The follow-up threshold percentage determines the top number of LSDs to be visited for emissions localization and repair. The selected program has the following follow-up requirements after each designated screening event:</p> <ul style="list-style-type: none">• Screening campaign 1 (Q2, 2024) 17% of all sites follow-up• Screening campaign 2 (Q3, 2024) 17% of all sites follow-up• Screening campaign 3 (Q2, 2025) 17% of all sites follow-up• Screening campaign 4 (Q3, 2025) 17% of all sites follow-up
Step 3	Follow-up	<p>Follow-up emissions localization will occur on the ground at the LSDs outlined in Step 2. Here, fugitive emissions will be differentiated from vented emissions. Fugitive emissions will be tagged and recorded for repair, while vented emissions will be recorded for potential future reduction programs.</p>
Step 4	Repair	<p>At the follow-up sites, all fugitive repairs will be made according to AER <i>Directive 060</i> timelines once a fugitive leak has been localized.</p>