

Torxen is proposing to apply an outcome-based approach to sites requiring surveys as defined under Directive 60 (D-60). Based on the modelled emissions per site and calculated required reduction per site, Torxen will focus on sites where the most tonnes of methane can be reduced with the least cost. Torxen's Alternative FEMP will involve the use of standard equipment and methods (FID / OGI) and a screening of the entire operating area annually with a truck mounted methane detection unit capable of detecting 20-50ppb methane. Pipeline, well and facility leaks are detected and repaired through this program.

Baseline modelling completed by a third party indicates that Torxen emitted approximately 5,847 tonnes of methane from fugitive emissions from 623 facilities in 2019. When Torxen applies a 40% reduction factor to sites requiring one survey per year and a 70% reduction to sites requiring three visits per year, approximately 3,461 tonnes of methane would be reduced under Directive 060. The proposed program is designed to achieve equivalent reductions to those required under Directive 060.

Once the program is implemented, Torxen will be tracking actual leak detection data for all sites included in the program. The methodology for leak detection, tracking and repair will be consistent with D-60 requirements.

- A qualified third party has been engaged to conduct the surveys using standard FID/OGI leak detection methodology consistent with D-60 requirements.
- Leak repair data will be captured in data management software. More complex leaks requiring specialized services, on a turnaround will be entered into, Torxen's work order tracking tool.
- Data from Target Online and Maximo will be imported into Emissions Manager, a third-party emissions calculation tool used to calculate emissions and analyse program performance.

Torxen's Alternative FEMP is approved as a one-year pilot. Torxen will compare predicted vs. actual emissions data to verify the accuracy of the models. If significant gaps exist, Torxen will re-evaluate and consider measures to close data gaps.