

By Email Only

January 20, 2025

Horn Ridge Resources Ltd. (Formerly Altitude Resources Inc.)

**Attention:** Doug Porter, [dporter@noirresources.ca](mailto:dporter@noirresources.ca)

Calgary Head Office  
Suite 1000, 250 – 5 Street SW  
Calgary, Alberta T2P 0R4  
Canada

[www.aer.ca](http://www.aer.ca)

Dear Sir:

**RE: Reconsideration of Suspension and Expiry Dates of Approvals under Section 42 of the  
*Responsible Energy Development Act*  
Palisades Project: Coal Exploration Program CEP 170002 (the Approval)**

Pursuant to section 42 of the *Responsible Energy Development Act* (REDA) the Alberta Energy Regulator (AER) has reconsidered its decision to suspend the Approval of Horn Ridge Resources Ltd. on April 30, 2021 (Suspension Decision) and also reconsidered the Approval to extend the reclamation expiry date of the Approval to account for the period of suspension (as set out in Appendix 1).

The Approval was suspended on April 30, 2021 following a reconsideration by the AER that followed the issuance of *Ministerial Order 093/2021*, Coal Exploration Direction (Suspension Decision). The April 30, 2021 decision was varied on March 7, 2022 following the issuance of *Ministerial Order 002/2022* to allow Horn Ridge Resources Ltd. to proceed with abandonment and reclamation of the sites and it was noted that the CEP continued to be suspended until written notice is provided by the AER.

The AER has received direction from the Minister of Energy and Minerals, in *Ministerial Order 003/2025* (MO 003/2025), dated January 15, 2025. The AER has been directed pursuant to section 67 of the REDA to:

- a. lift the suspension of all approvals that were suspended under Ministerial Orders 054/2021, 093/2021 and 002/2022;
- b. extend the expiry dates of approvals suspended under Ministerial Orders 054/2021, 093/2021 and 002/2022 to account for the period of suspension;
- c. continue to apply the restrictions in place in respect of the exploration for and development of coal within categories of lands as described in *A Coal Development Policy for Alberta* (1976) when evaluating coal applications, with consideration of the Coal Industry Modernization Initiative policy guidance set out in the Government of Alberta News Release, titled “Protecting the environment with tougher coal rules”, dated December 20, 2024, and

- d. comply with directions given under MO 003/2025 by January 31, 2025.

Subsection 67(2) of the REDA provides that the AER shall, within the time period set out in a ministerial order, comply with the directions given under section 67.

The AER has the authority to reconsider its decisions pursuant to section 42 of the REDA. That section states:

The Regulator may, in its sole discretion, reconsider a decision made by it and may confirm, vary, suspend or revoke the decision.

The AER considers it is appropriate to exercise its authority under section 42 of the REDA because of MO 003/2025. The AER has decided to conduct a reconsideration of the Suspension Decision and to reconsider the Approval to extend the reclamation expiry date of the Approval to account for the period of suspension, without a hearing.<sup>1</sup> The AER further notes that as no statements of concern were received prior to the issuance of the Approval, the reconsideration of the Suspension Decision and reconsideration of the Approval can proceed without requiring additional written submissions.

### **Decision on Reconsideration**

Having reviewed and considered MO 003/2025, the AER is satisfied that the MO is clearly within the scope of subsections 67(1) (a) and (b) of the REDA. The lifting of the suspension of all approvals for coal exploration that were previously suspended pursuant to Ministerial Orders, 093/2021 and 002/2022 is a clear priority of the Government of Alberta, which the AER has been directed to follow in the carrying out of its powers, duties and functions in this area of its jurisdiction. The direction is also aimed at ensuring the AER considers the application of the 1976 Coal Policy and government policy as expressed in the December 20, 2024 news release. Given that this is a valid exercise of the Minister's authority pursuant to legislation, the AER is required to comply with the direction as per subsection 67(2) of the REDA within the time period specified in it, and the AER has identified no other grounds that would warrant doing otherwise.

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<sup>1</sup> Section 43 of REDA provides that the AER may conduct a reconsideration with or without a hearing.

Accordingly, the AER has decided to lift the suspension of the Approval. Effective the date of this letter, the suspension of the Approval is lifted and the reclamation expiry date set out in the Approval is extended to **February 08, 2026** to account for the period of suspension as detailed in Appendix 1.

Sincerely,

*<Original signed by>*

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Laurie Pushor  
President and CEO

cc: Rushang Joshi, AER  
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**Appendix 1: Approval on Category 2 lands**

<b>Company</b>	<b>Project</b>	<b>Type of Disposition</b>	<b>Disposition Number</b>	<b>Original Operational Expiry</b>	<b>Original Reclamation Expiry Date</b>	<b>New Reclamation Expiry Date</b>
Horn Ridge Resources Ltd.	Palisades	Coal Exploration Program	CEP 170002	2019-05-31	2022-05-19	2026-02-08