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December 11, 2025

By email & regular mail

Kenneth Everett

Paladin Services Group Ltd.

Attention: Kevin Baumann

Dear Parties:

RE: Request for Regulatory Appeal by Ken Everett

Paladin Services Group Ltd. (Paladin)

Well Licence No. 0519207 (Well Licence)

Location: 15-36-44-1 W5

Request for Regulatory Appeal No.: 1958826 (Regulatory Appeal)

The Alberta Energy Regulator (AER) has considered Mr. Everett's request under section 38 of the *Responsible Energy Development Act (REDA)* for a regulatory appeal of the decision to issue the Well Licence to Paladin. The AER has reviewed Mr. Everett's request and the response submissions made by Paladin. Mr. Everett did not submit a reply submission.

For the reasons that follow, the AER has determined that Mr. Everett is not, for the purposes of *REDA*, an "eligible person" to request a regulatory appeal in this matter. Therefore, the request for a Regulatory Appeal is dismissed.

The applicable provision of *REDA* in regard to requests for regulatory appeals, section 38, states:

38(1) An eligible person may request a regulatory appeal of an appealable decision by filing a request for regulatory appeal with the Regulator in accordance with the rules. [emphasis added]

The term "eligible person" is defined in section 36(b)(ii) of *REDA* to include:

a person who is directly and adversely affected by a decision [made under an energy resource enactment]...

The term "appealable decision" is defined in section 36(a)(iv) of *REDA* to include:

A decision of the Regulator that was made under an energy resource enactment, if that decision was made without a hearing....

Section 38(1) creates a three-part test for a regulatory appeal. First the requester must be an eligible person as defined in section 36(b) of *REDA*. Second, the decision from which the requester seeks

regulatory appeal must be an “appealable decision” as defined in section 36(a) of *REDA*. Third, the request must have been filed in accordance with the *Alberta Energy Regulator Rule of Practice (Rules)*.

Reasons for Decision

Background

On March 5, 2025, Paladin applied to the AER for a disposal well (Paladin Application). The AER received a Statement of Concern (SOC) from Kenneth & Judy Everett (Everetts) in relation to the Paladin Application (SOC 32784).

On July 4, 2025, the AER issued correspondence to the Everetts in relation to their SOC 32784, advising that a hearing was not required to consider their concerns, and that the applied for approvals has been issued to Paladin.

On July 21, 2025, the AER received, by letter mail from Mr. Everett, a request for a Regulatory Appeal under section 38 of the *REDA*, in relation to the AER's decision to issue Well Licence No. 0519207 (Well Licence) to Paladin on July 4, 2025 (Request).

On July 22, 2025, the AER issued correspondence by email to Mr. Everett advising that the Request was missing certain information required under section 30 of the *Rules* (Deficiency Correspondence).

On July 25, 2025, the AER received email correspondence filed on behalf of Mr. Everett, submitting a portion of his Request, advising that Mr. Everett no longer has an active email address, and providing his contact information for correspondence regarding his Request.

On July 28, 2025, the AER re-issued the Deficiency Correspondence to Mr. Everett by registered mail.

On August 13, 2025, the additional information required to complete Mr. Everett's Request was received by the AER.

On September 9, 2025, Paladin submitted its response to Mr. Everett's Request, which included a photograph submitted to have been taken on September 7, 2025, at the boundary of the Everett property, indicating that the property had been sold.

On December 3, 2025, the AER issued correspondence to Mr. Everett requesting confirmation from the Everetts as to whether they still own and/or reside at the property located at NE-33-44-28W4.

On December 5, 2025, the AER received correspondence from counsel for Mr. Everett, confirming that he no longer owns or resides at the property located at NE-33-44-28W4, and that “he has no further interest in the Request.” However, a formal withdrawal of the Request was not submitted.

Having regard to the above and the fact the Mr. Everett no longer owns or resides at the property located at NE-33-44-28W4, the AER finds that Mr. Everett has not demonstrated that he is directly and adversely affected by the decision to issue the Well Licence and therefore Mr. Everett is not an “eligible person” for the purposes of section 38(1) of REDA. Accordingly, the Request is dismissed.

Sincerely,

<Original signed by>

Michael Bevan

Senior Advisor, Water

<Original signed by>

Michael Brown

Senior Advisor, Air

<Original signed by>

Steve Thomas

Director, Oil & Gas Subsurface, Waste & Storage