



AER Update on Imperial Kearn: March 28 – April 4, 2024

Hello everyone,

We hope you are looking forward to a pleasant weekend.

Please find the latest information regarding the Alberta Energy Regulator's continued regulatory oversight of Imperial under the terms of the environmental protection order.

If you have any questions, please reach out.

Sincerely,

Fiona

AER Highlights

- NODA, WETA, DP4, and WB3 areas were inspected by the AER on April 2 and April 5
- The AER's next site inspection is planned for April 9
- AER SMEs are currently reviewing the following documents and Imperial's responses to supplemental information requests (SIRs) from the AER:
 - Update to the Source Control and Containment Plan
 - Conceptual Site Model Interim Report. Additional SIRs were sent to Imperial by the AER

North Overburden Disposal Area (NODA)

- The soil removal program was initiated with test pitting to refine the extent of soil to be removed.
 - The test pits were completed on March 29, 2024, and results are being reviewed
 - Results will be provided once finalized
- With spring-breakup underway, the remainder of the soil removal work may be delayed until later in the year

West External Tailings Area (WETA)

- Normal operations; no updates

Drainage Pond 4 (DP4)

- The soil removal program was initiated with test pitting to refine the extent of soil to be removed.
 - The test pits were completed on March 29, 2024, and results are being reviewed; results will be provided once finalized.
- With spring-breakup underway, the remainder of the soil removal work may be delayed until later in the year

Water Body 3 (WB3)

- No unplanned downtime on any of the well vacuum systems
- All three wellpoint systems have been operating consistently
- Preparations underway to reinstall sump pump when the waterbody has thawed

2023 Winter Drilling Programs:

- There are currently 235 locations planned as part of the EPO winter drilling scope. This number has been reduced from the planned 244 locations.
- The number of EPO monitoring wells has decreased to 211 from 218
- These adjustments have been made due to issues with accessing the locations
- The number of ETA-SIS pumping wells has decreased from 26 to 24
 - This decision was made by Imperial due to unsuitable geology and/or insufficient water for a pumping well to be effective
- To-date, all of the planned 211 EPO monitoring wells have been completed, and 23 of 24 planned ETA-SIS pumping wells have been completed

Monitoring & Sampling

- Visual inspection at seep locations are ongoing
- Inspections and sampling of seeps where water is present continue
- Planning is in progress to facilitate access to required locations through spring break-up season.
- On March 21 the AER approved Imperial's request to place rig matting at various EPO sampling access points to bridge over soft/wet ground areas and to minimize ground disturbance during sampling efforts in non-winter conditions
- The sampling frequency in surface water and groundwater locations (where applicable in the Sampling and Monitoring Plan) increased during the last week of March with the start of spring freshet
- AER update of March 22 included information regarding two groundwater monitoring wells at WB3 which had sulphate and total dissolved solids (TDS) concentrations above Alberta Tier 1 guidelines and were showing an increasing trend.
 - Repeated samples that Imperial collected for verification was done on March 9
 - The verification sampling results indicate the sulphate and TDS concentrations decreased for both of these locations.
 - Imperial states there is no indication that the elevated sulphate in these groundwater wells is reaching WB3.
 - The samples collected within WB3 continue to have sulphate concentrations at background (pre-development) concentrations.

Fish and Wildlife

- Weekly inspections of fenced wildlife areas are ongoing
- Imperial's Wildlife Site Specific Risk Assessment (SSRA) is currently underway:
 - The SSRA Milestone 1 meeting was held with communities on February 13
 - The SSRA Milestone 2 meeting was held with communities on March 27