

Section 17: Environmental Protection

17.1 Environmental Protection

17.1.1 Introduction

NORSEMAN HDD UNDERGROUND SOLUTIONS is committed to protecting the environment in all aspects of our operations. The following program outlines the procedures that have been implemented to ensure compliance to that program. NORSEMAN HDD UNDERGROUND SOLUTIONS will comply with all applicable federal, state, provincial, and local Government Environmental legislation and regulations.

17.1.2 Environmental Risk Assessment

All NORSEMAN HDD UNDERGROUND SOLUTIONS project superintendents or designate shall be required to complete an environmental risk assessment as a part of the overall project risk assessment prior to beginning work on a project. All items requiring action noted on the project risk assessment must be completed prior to beginning work on the project.

17.1.2 Owner/Client/Prime Contractor Requirements

NORSEMAN HDD UNDERGROUND SOLUTIONS must comply with all client, owner, or prime contractor project or contract specific requirements in the development and implementation of the project or contract environmental protection plan and project risk assessment.

17.1.3 Environmental Protection Program

Where clients, owners, or prime contractors require an Environmental Protection Program for the project or contract, the plan will be based on project requirements and the project risk assessment. The following may also be considered and addressed in the plan:

- Issuance of any permits or licenses required.
- Shipping, handling, and storage of environmentally hazardous products.
- Watercourse siltation control procedure(s).
- Spill containment procedure(s).
- Emergency response plan including personnel, equipment and emergency contact numbers.

17.1.4 Training

NORSEMAN HDD UNDERGROUND SOLUTIONS employees will receive education and training on every project or contract where an Environmental Protection Plan is

developed or where risks to the environment exist. The following topics shall be covered:

- Spill Containment and Response Planning.
- Spill Clean up and Disposal Procedures.
- Restoration of Contaminated Areas.
- Environmental Incident Reporting.

All other site workers receive training in EPP responsibilities during project orientation. The training required depends upon the level of environmental sensitivity. As a minimum, training will consist of the following:

- Project Specific Environmental Rules.
- Reporting of Spills.
- Emergency Response Procedures.

17.1.5 Regulatory Agencies

NORSEMAN HDD UNDERGROUND SOLUTIONS cooperates with Environmental Regulatory Agencies on all projects and contract in the development and implementation of preventative plans, as well as the reporting of environmental spills and other types of environmental harm to the appropriate regulatory authorities for the jurisdiction of work.

Notification Procedure

If an environmental incident occurs on a project, the following notification must be implemented:

- The Project Superintendent/Supervisor will immediately contact the Project Manager and HS&E representative.
- If the incident is required to be reported to the local governing Environmental Protection Agency, the HS&E representative and/or Project Manager will contact the appropriate authorities as well as management.

17.1.6 Emergency Response Plan (ERP)

Some project and contracts may require the development of a project specific ERP. At a minimum NORSEMAN HDD UNDERGROUND SOLUTIONS will develop and implement applicable work procedures and controls for the prevention of environmental harm, as well as the clean up of any environmental spill or other damage if that was to occur on site.

Emergency Response Plan

In environmentally sensitive areas the Project Superintendent shall ensure the plan addresses the following environmental issues:

- Worker Evacuation Procedures.
- Spill Containment Procedures.
- Securing leak source.
- Emergency Contact Numbers.
- Spill Cleanup Procedures.
- Contaminated Waste Disposal.

17.1.7 Environmental Practices

Soil Conservation

When working in environmentally sensitive areas all project personnel will be informed of site requirements and guidelines for:

- Rights of way.
- Soil disturbances.
- Stock piling.
- Low ground pressure tires or tracks.
- Project restoration.

Groundwater

NORSEMAN HDD UNDERGROUND SOLUTIONS shall ensure all spills deemed as hazardous are promptly cleaned-up to reduce potential harm to groundwater.

Noise

Operations will not exceed local noise by-laws.

Waterways

Working close to environmentally sensitive waterways may require special project procedures be developed to protect these areas.