

GAYFORD DATA PROCESSING FACILITY MASTER SITE DEVELOPMENT PLAN

Gayford Integrated Energy and Data Facility
NW ¼ Section 35, Township 26, Range 25, W4M
Rocky View County, Alberta



Prepared by VL Energy on behalf of Armada Nowlit Energy
July 2026



Acknowledgements

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Executive Summary

The Gayford Facility is a proposed integrated natural gas-fired power generation and on-site data processing development within NW ¼ Section 35, Township 26, Range 25, W4M in Rocky View County. This Master Site Development Plan supports the redesignation of a defined ±1.8-hectare (±4.5-acre) area from Agricultural, General District to a site-specific Direct Control District.

The compact facility will include nine containerized natural gas generator units, nine modular data processing containers, and associated emission-control, electrical, gas, access, security, drainage, and landscaping infrastructure. Total installed generating capability will be 18 MW. Electricity will be consumed exclusively on site, with no connection or export to the Alberta Interconnected Electric System. Pipeline supply will eliminate routine trucked fuel deliveries and closed-loop dry cooling will avoid process-water demand, cooling-tower emissions, and process-wastewater generation.

The geotechnical investigation identified generally favorable subsurface and groundwater conditions. Air dispersion modelling predicts nitrogen dioxide concentrations below applicable Alberta Ambient Air Quality Objectives, and the Noise Impact Assessment confirms compliance with AUC Rule 012 at all assessed receptors. Traffic effects are expected to be limited because the facility will have low ongoing trip generation, no public access, and no routine fuel or water-hauling requirements.

The development has been planned to remain compatible with the surrounding rural and agricultural context. Key measures include a security-fenced footprint, all-weather emergency access, dark-sky-compliant lighting, native and drought-tolerant landscaping, visual screening, hazardous-material controls, and a site-specific Emergency Response Plan. Public consultation included notification, direct meetings, and follow-up with landowners, occupants, nearby stakeholders, and Rocky View County. Most respondents identified no concerns or provided confirmations of non-objection; the limited information requests raised during consultation have been addressed or remain subject to ongoing follow-up as further technical and operational information becomes available.

Provincial and municipal approvals will continue to govern implementation. The AUC application is under review, a draft EPEA Industrial Approval has been issued, and Historic Resources Act clearance has been obtained. Following permanent closure, the facility and associated infrastructure will be removed and the affected land reclaimed for agricultural use or tame pasture, supported by the decommissioning and reclamation security framework described in this MSDP.

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Section 1.0 – Introduction

1.1 Purpose of the MSDP

This Master Site Development Plan (MSDP) has been prepared to support a Land Use Redesignation application to Rocky View County for a proposed integrated natural gas-fired power generation and data processing facility. The application seeks to redesignate a defined ± 1.8 -hectare (± 4.5 -acre) area within NW $\frac{1}{4}$ Section 35, Township 26, Range 25, W4M from Agricultural, General District (A-GEN) to a site-specific Direct Control (DC) District.

This MSDP provides Rocky View County with a comprehensive planning framework to guide future development. It establishes the overarching development concept, design guidelines, servicing approach, transportation strategy, environmental mitigation measures, emergency response framework and public consultation for the development. The remainder land within the quarter section will remain agricultural land and continue in agricultural production. The proposed Direct Control District does not create a separate parcel.

1.2 Site Context and Location

The Gayford Facility is located within Rocky View County, adjacent to an existing Ember Resources Ltd. natural gas compressor station. The nearest town, Irricana, is located approximately ± 16 km to the northwest. The development site is within an established energy infrastructure corridor. Figure 1 and Figure 2 below provide regional and local context for the facility, including surrounding transportation routes, adjacent parcels, existing energy infrastructure, and nearby land uses.



Figure 1: Regional Location Map

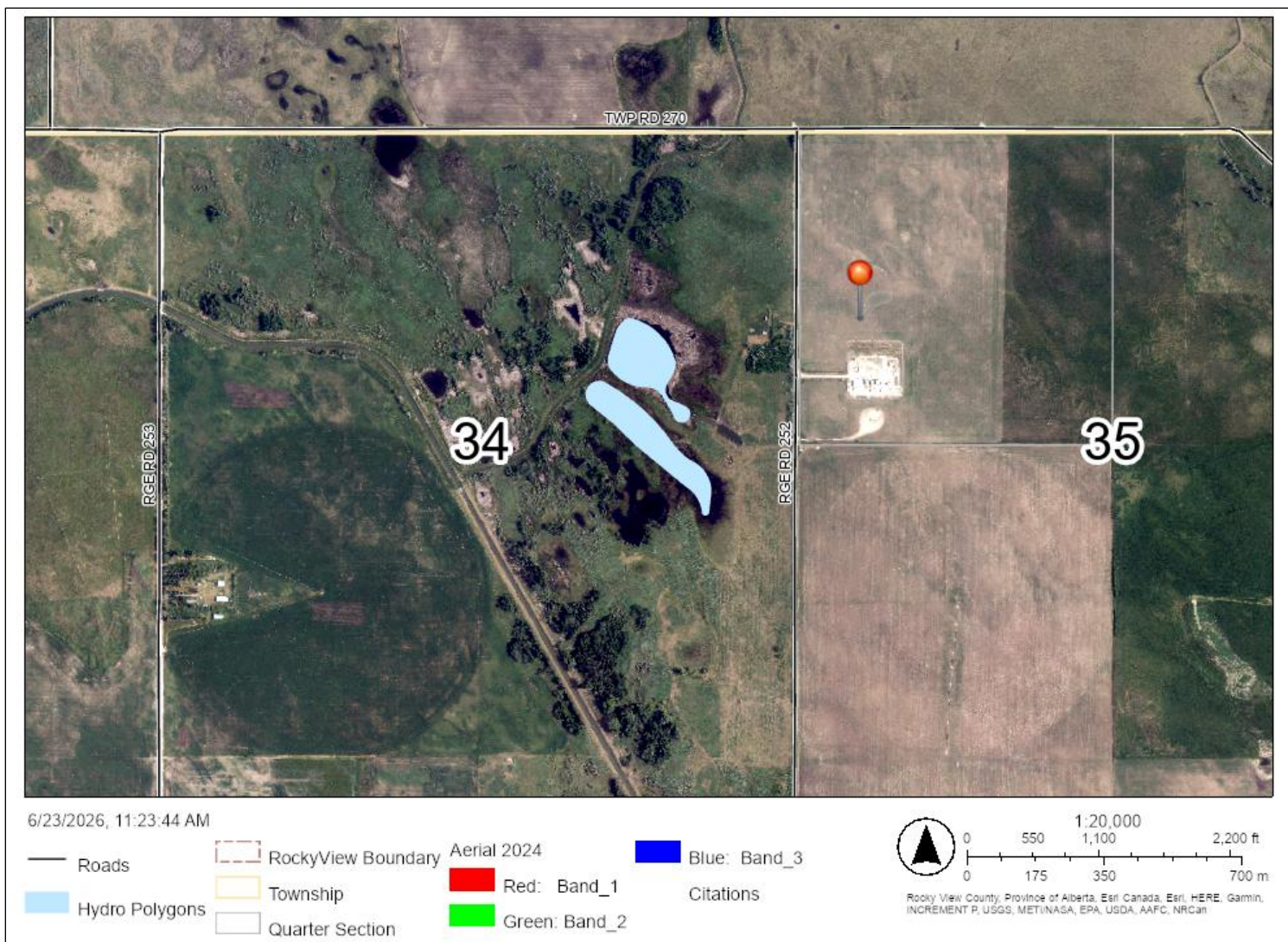


Figure 2: Local Context Map

1.3 Legal Description

Legal Description:	NW ¼ Section 35, Township 26, Range 25, W4M
Total Parcel Area:	± 156 acres (± 63.2 hectares)
Proposed MSDP Plan Area:	± 1.8 hectares (± 4.5 acres) – approx. 2.8% of the quarter section

1.4 Existing Land Use and Designations

Land Use Bylaw District:	Agricultural, General District (A-GEN)
Proposed Redesignation:	Direct Control District (DC)
Area Subject to Redesignation:	± 1.8 hectares (± 4.5 acres)
Balance Lands:	Remain Agricultural, General District (A-GEN) – no change proposed

1.5 Ownership and Lease Agreement

Registered Landowner:	Lorne P. Putnam
Applicant / Proponent:	VL Energy Ltd. on behalf of Armada Nowlit Energy
Surface Lease / Agreement:	Surface Lease / Agreement No. 25-00471-001 has been acquired for the proposed area within NW 35-26-25 W4M. The agreement identifies Armada Nowlit as operator and Lexterra Land Ltd. as broker. The landowner is Lorne P. Putnam, and the occupant is Thurston Bros Ltd.
Shared Access:	Ember Resources has confirmed that it agrees to share its existing access road and approach with the development.

1.6 Objectives

- Provide a comprehensive planning and policy framework for Rocky View County's review to support the land use redesignation application.
- Demonstrate conformity with the Rocky View County Municipal Development Plan (Bylaw C-8753-2025) and Land Use Bylaw (Bylaw C-8000-2020).
- Establish a clear and enforceable development concept, including site layout, footprint limits, setbacks, design standards, and operational parameters.
- Identify and mitigate potential impacts on surrounding agricultural lands, environmental features, and nearby sensitive receptors.
- Define transportation, servicing, and infrastructure strategies appropriate for the rural context, and document public and stakeholder engagement activities and responses to concerns raised.
- Establish a phasing and implementation framework for future Development Permit applications and confirm decommissioning and reclamation obligations to support the long-term agricultural viability of the balance lands.

Section 2.0 –Site Conditions

2.1 Site Description

The proposed development area is approximately 1.8 ha (4.5 ac), plus associated access area, within a 156-acre quarter section in a flat to gently rolling prairie setting. The footprint represents approximately 2.8% of the total quarter section. Ember Resources Ltd. natural gas compressor station is immediately south. Figure 3 below shows the proposed development area in relation to the surrounding agricultural lands and adjacent energy infrastructure.



Figure 3: Site Air Photo

2.2 Topography and Drainage

The site is flat to gently rolling prairie with shallow topographic relief and no steep slopes. No mapped watercourses, permanent waterbodies, or steep slopes are within the development footprint. Natural sheet-flow drainage occurs toward existing agricultural drainage pathways.

Figure 4 below illustrates the existing topography and drainage context for the proposed development footprint.

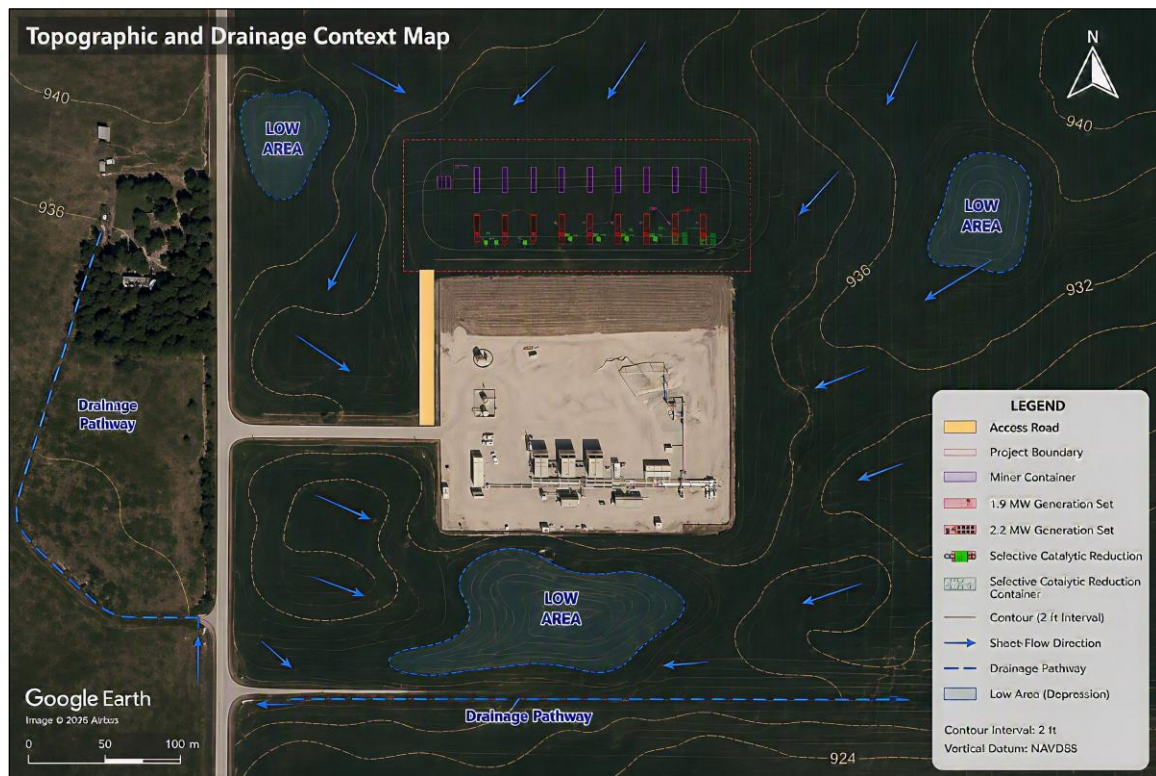


Figure 4: Topographic and Drainage Context Map

2.3 Oil and Gas Infrastructure

Key Alberta Energy Regulator registered infrastructure in the vicinity:

- Ember Resources Ltd. natural gas compressor station – immediately south of proposed footprint.
- ATCO Gas Pipeline – south of the parcel.
- Ember Resources Ltd. pipeline right-of-way – within and adjacent to parcel.
- Ember Resources Ltd. access road and lease – existing site access route.

All AER pipeline setbacks and safety requirements will be respected. Facility co-locates with existing infrastructure to leverage energy assets and minimize new land disturbance. Figure 5 shows the nearby oil and gas infrastructure context.

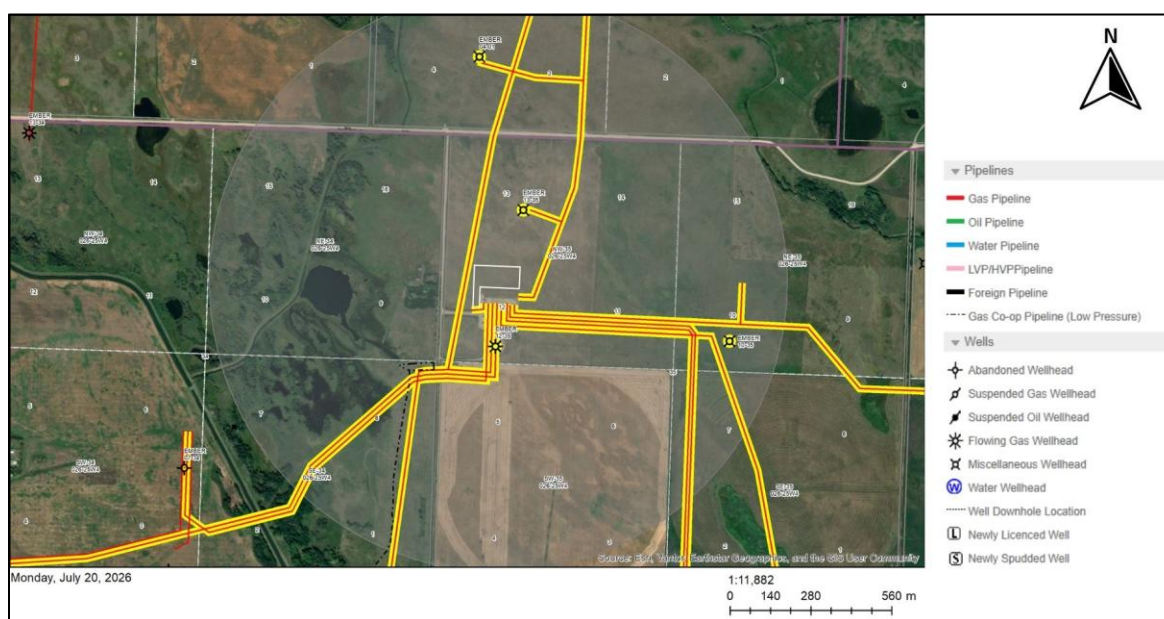


Figure 5: Oil and Gas Infrastructure Map (AER/Abadata Map)

2.4 Wetlands and Environmental Features

Desktop review of the Alberta Merged Wetland Inventory (AMWI) identified wetland features in the broader landscape. No mapped wetlands were identified within the proposed 1.8-ha development footprint. Development planning has been undertaken to avoid disturbance of identified wetlands.

Figure 6 presents the wetlands and environmental features identified through the Alberta Merged Wetland Inventory (AMWI), showing mapped wetland features in the broader landscape and their relationship to the proposed development footprint.

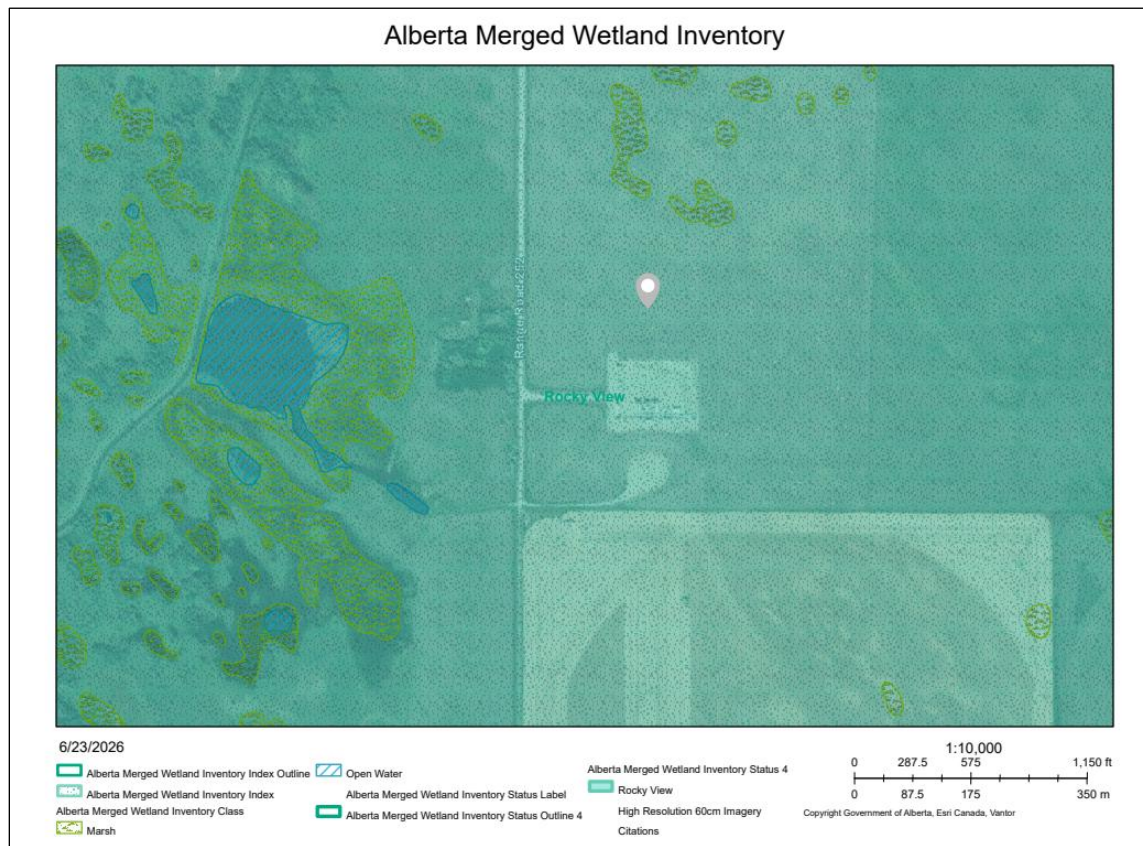


Figure 6: Wetlands and Environmental Features Map (Alberta Merged Wetland Inventory)

2.5 Geotechnical Consideration

Inline Group Inc. was retained to complete a geotechnical investigation for the proposed Gayford Facility to confirm subsurface soil, groundwater, and foundation conditions within the proposed development footprint and to identify geotechnical constraints and design considerations relevant to site grading, equipment pads, internal gravel access roads, stormwater management, and construction activities. The field investigation was completed on June 17, 2026, and comprised nine (9) boreholes advanced to depths of approximately 2.0 m to 6.5 m below existing grade, together with standard penetration testing, installation of groundwater monitoring standpipes, and laboratory testing on recovered soil samples. The final geotechnical report (Inline Group Inc., File No. 226-046, July 2026) has been completed and is provided to Rocky View County for review.

The investigation confirmed that subsurface conditions across the site are generally favorable and suitable for the proposed development. Key findings of the geotechnical report include:

- **Subsurface stratigraphy:** Topsoil/loam overlying compact to dense silty sand, underlain by sandstone bedrock. Hard refusal was encountered in the deep test holes, generally between approximately 4 m and 6 m below existing grade.
- **Groundwater:** The permanent groundwater table is expected to be at least 5 m below existing grade, with a recommended design high groundwater depth of 5.5 m. Groundwater is not anticipated to be a significant concern for typical excavations within the development footprint.
- **Seismic classification:** The site is classified as Site Class C for seismic response in accordance with the National Building Code – 2023 Alberta Edition.
- **Foundations:** Steel screw piles are considered suitable for the primary support of the proposed structures and equipment foundations.
- **Corrosivity:** Laboratory testing indicated low soil salinity, with low chloride and sulphate concentrations and near-neutral to slightly alkaline pH (7.7–7.9), corresponding to a low corrosion potential for buried steel and concrete.
- **Frost protection:** The estimated frost penetration depth ranges from approximately 2.07 m (average annual) to 2.3 m (1:100-year return period); a design frost depth of 2.3 m is recommended for exterior utilities, foundations, and unheated areas.
- **Earthworks and access roads:** The report provides recommendations for subgrade preparation, engineered and common fill placement and compaction, site grading and drainage, and preliminary structural sections for the gravel access road and yard.

The recommendations of the geotechnical report will be incorporated into the detailed engineering design and construction management approach for the facility, including grading plans, equipment pad and foundation design, internal road design, stormwater implementation planning, erosion and sediment control, frost protection, and reclamation considerations. The Applicant will address any County comments on the geotechnical report through the subsequent Development Permit and detailed engineering review process.

Section 3.0 – Policy Alignment

3.1 Municipal Development Plan (MDP)

The proposed Gayford Facility has been reviewed for alignment with the Rocky View County Municipal Development Plan (MDP), Bylaw C-8753-2025, with reference to Section 20 – Natural Resource and Energy Development. Table 1 summarizes the applicable MDP policies and identifies how the proposed development responds to each policy direction.

Table 1: Municipal Development Plan Policy Alignment

MDP Policy	Policy Direction	Project Response	Conformity
20.4	New natural resource projects shall identify compatibility with the existing land use context and environmental characteristics, mitigation of off-site impacts, and implementation best practices for resource extraction.	Facility limited to compact (± 1.8 ha/ ± 4.5 ac) footprint adjacent to existing gas infrastructure. Mitigation for noise, lighting, drainage incorporated.	Conforms

3.2 Land Use Bylaw (LUB)

The proposed facility is not permitted or discretionary use within the Agricultural, General District (A-GEN). A land use redesignation to a site-specific Direct Control District (DC) is proposed to accommodate the facility and establish appropriate site-specific development standards.

- The DC District will be restricted to the (± 1.8 ha/ ± 4.5 ac) footprint and will prohibit subdivision, unrelated industrial uses, and residential development.
 - The DC Bylaw will incorporate all applicable standards and conditions identified through the MSDP review process, including decommissioning and reclamation requirements.
 - All development on the site shall comply with the applicable sections of the Rocky View County Land Use Bylaw (Bylaw C-8000-2020), including requirements related to parking, landscaping, signage, and site design.
 - Any expansion of the development beyond the area approved under the Master Site Development Plan and Direct Control Bylaw would require corresponding amendments to both planning documents.
-
- **Policy 3.2.1** All development standards in the proposed Direct Control Bylaw must be consistent with the Land Use Bylaw and County Servicing Standards.

3.3 Regional and Provincial Regulations

Table 2 summarizes the key regional and provincial regulatory requirements applicable to the proposed development and identifies the current approval status for each framework.

Table 2: Regional and Provincial Regulatory Status

Regulatory Framework	Requirement	Status
Alberta Utilities Commission (AUC)	Power plant approval; noise compliance under AUC Rule 012	AUC submitted, currently under review
Environmental Protection and Enhancement Act (EPEA)	Industrial Approval for power plant operations	Draft EPEA Industrial Approval issued (No. 510321-00-00)
Historic Resources Act (HRA)	Historic resources clearance (OPaC process) prior to ground disturbance	Approved (No: 4940-25-0074-001)
Alberta Energy Regulator (AER)	Pipeline crossing approvals; well setback confirmations; surface lease registration	No separate AER approval is currently anticipated for the proposed development. The development does not cross pipelines, is located on privately owned land under a surface agreement, and will maintain applicable pipeline setbacks.
Water Act / Environmental Protection	Approvals for drainage works near water bodies / wetlands	Not anticipated to be required. No mapped wetlands, watercourses, or permanent waterbodies are located within the development footprint, and identified wetland features in the broader area will be avoided.

Section 4.0 – Development Concept

4.1 Description of the Development

The proposed Gayford Facility is an integrated natural gas-fired power generation and co-located modular data processing facility on approximately (± 1.8 ha/ ± 4.5 ac) within a 156-acre agricultural quarter section. The Facility leverages proximity to existing natural gas pipeline infrastructure. All generated electricity is consumed exclusively on-site; the Facility does not connect to or export to the Alberta Interconnected Electric System. Figure 7 illustrates the proposed development concept site plan for the Gayford Facility.

The development footprint will accommodate:

- Natural gas reciprocating generator units with integrated SCR emission control systems.
- Modular data processing containers (server/computing infrastructure).
- Electrical infrastructure: transformers, switchgear, and distribution equipment.
- Gas tie-in infrastructure and metering facilities.
- Internal gravel access roads and equipment pads.
- Industrial security perimeter fence with controlled access gate.
- Stormwater management features and drainage controls.
- Visual screening / earth berming along public road frontages.
- Topsoil and subsoil stockpile areas during construction (within DC boundary).

To provide a general indication of the anticipated scale of development, the Facility will include approximately 18 shipping-container-style modular units, comprising nine (9) containerized natural gas gensets and nine (9) modular data processing (miner) containers, along with associated SCR, electrical, and support equipment. Indicative unit dimensions are as follows:

- Six (6) 1.9 MW gas gensets – approximately 7.5 m long $\times$ 2.8 m high.
- Three (3) 2.2 MW gas gensets – approximately 7.0 m long $\times$ 2.9 m high.
- Nine (9) modular data processing (miner) containers – based on a standard 40-foot shipping-container footprint, approximately 12.2 m long $\times$ 2.5 m high.

These quantities and dimensions are approximate and are provided to convey the general scale and character of the equipment expected on site. Figure 7 provides the concept site plan of the facility.

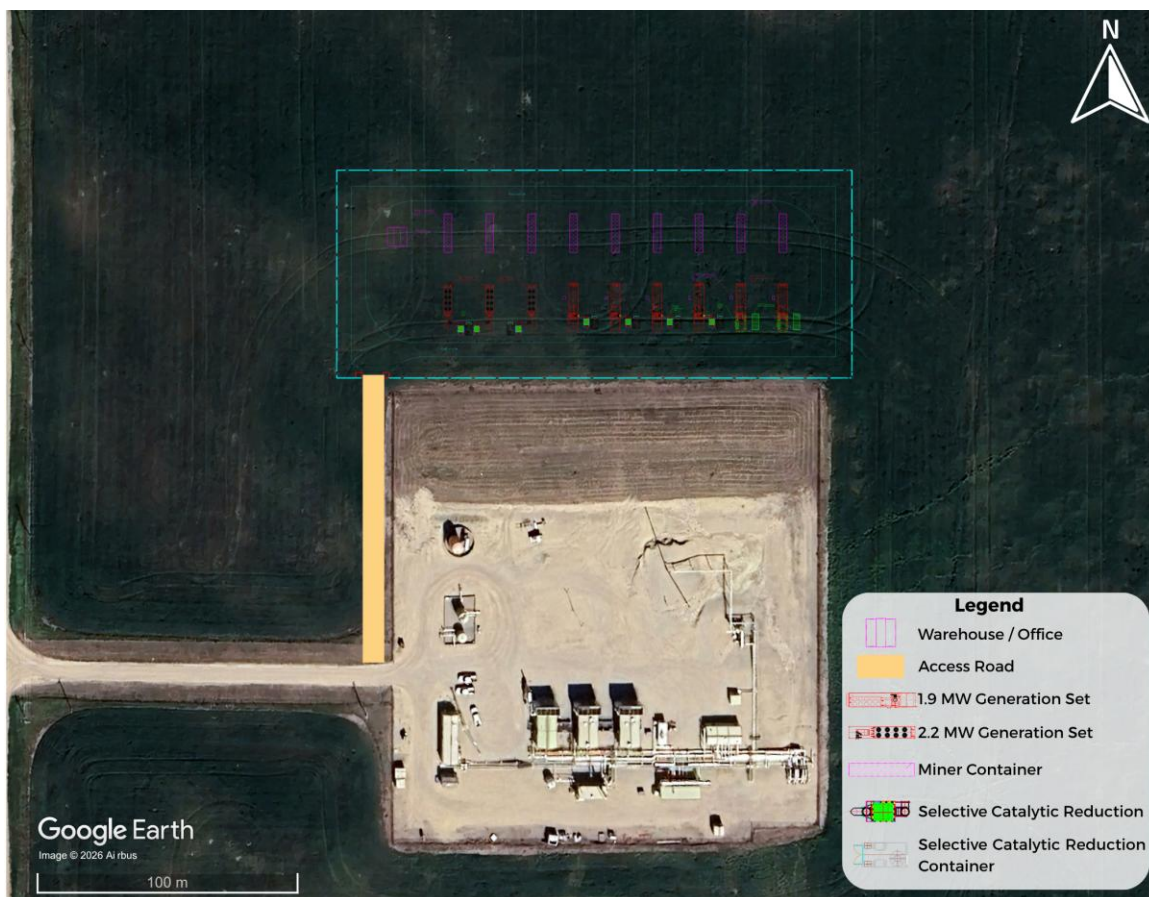


Figure 7: Concept Site Plan

4.1.1 Visual Renderings and Landscaping Concept

The conceptual rendering illustrates the anticipated scale and appearance of the Gayford Facility based on the current site plan.

Landscaping will be concentrated along the western and southern boundaries using native trees, shrubs and grasses to screen equipment, soften the site appearance and reduce views from the adjacent property west of the municipal road. Final landscaping details will be confirmed through the Development Permit process.

Note: Conceptual visualizations are provided for illustrative planning purposes only and have been prepared based on the current concept site plan. They are not intended for construction.



Figure 8: Conceptual View Looking East from Range Road 252



Figure 9: Conceptual View Looking Top

4.2 Power Generation System

The power generation system will consist of natural gas-fired reciprocating engine generator units supporting associated modular data processing infrastructure, with total installed generating capability 18 MW. The system operates by combusting sweet natural gas within internal combustion engines to produce mechanical energy, which drives generators to produce electricity for the co-located data processing loads. Electricity generated by the facility will be consumed entirely on-site and will not be exported to the Alberta Interconnected Electric System or local distribution system. Supporting electrical infrastructure will include transformers, switchgear, and auxiliary equipment required for safe distribution within the facility. Emissions performance will be managed through high-efficiency natural gas generation, Selective Catalytic Reduction emission controls, and continuous predictive emissions monitoring.

4.3 Cooling Systems and Air Emissions

The Facility will use a closed-loop radiator cooling system that requires no process water withdrawal or discharge. Each generating unit will use an integrated closed-loop liquid cooling circuit to manage engine heat. Waste heat from the engine jacket and charge-air cooler will be transferred to containerized liquid-to-air radiator cooling units, where heat is rejected to ambient air within the fenced development footprint. Because heat rejection is entirely dry, the Facility will not produce cooling tower plumes, drift, or process wastewater. This cooling approach minimizes water demand, avoids wastewater generation, and supports the Facility's low-impact rural servicing strategy.

Heat rejected by the cooling system is separate from engine combustion exhaust, which is managed through dedicated emission controls. Emissions controls, including SCR, will be operated and maintained, and compliance will be verified through the monitoring and reporting requirements established under EPEA Industrial Approval No. 510321-00-00. All nine generator units will be equipped with Selective Catalytic Reduction systems to reduce nitrogen oxide (NOx) emissions, supported by continuous predictive emissions monitoring.

A site-specific air quality dispersion modelling assessment was completed by Calvin Consulting Group Ltd. (Revised Air Quality Dispersion Modelling Assessment, Job No. J2026-002R, July 13, 2026) in accordance with the 2021 Alberta Air Quality Model Guideline, using the U.S. EPA AERMOD model, five years of Alberta Environment and Protected Areas meteorological data, elevated terrain, building downwash, measured background concentrations, and cumulative emissions from the adjacent Ember Resources Ltd. compressor station. Air dispersion modelling confirmed that predicted ground-level NO₂ concentrations comply with the applicable Alberta Ambient Air Quality Objectives (AAQOs) and indicate no significant air quality concerns. Including background, the ninth-highest predicted one-hour NO₂ concentration is 138.7 µg/m³ against the 300 µg/m³ objective, and the maximum predicted annual NO₂ concentration is 8.1 µg/m³ against the 45 µg/m³ objective, at and beyond the Facility fenceline.

4.4 Site Operations

- Continuous automated operation of power generation and data processing.
- No permanent on-site staffing. The facility does not accommodate residential, office, retail, or public-facing uses.
- Periodic maintenance visits by authorized personnel (estimated 1–3 vehicle visits/day during operations).
- Secure perimeter fencing with controlled access
- All exterior lighting compliant with Rocky View County dark-sky principles (fully shielded, downward-directed LED).

4.5 Employment

Table 3 summarizes the anticipated construction and operational staffing levels for the facility.

Table 3: Employment Summary

Phase	Personnel Type	Estimated Numbers
Construction	Construction workers, equipment operators, supervisors	Approximately 10 persons/day during typical construction, with up to 15 persons/day during peak equipment installation and commissioning.
Operations – Regular	Remote monitoring (off-site). No permanent on-site staff.	No permanent on-site employees; facility monitored remotely on a 24/7 basis.
Operations – Maintenance	Maintenance technicians, inspection staff (periodic visits)	1–3 personnel per visit, with approximately 1–3 maintenance or inspection visits per day during normal operations.

Section 5.0 – Transportation

5.1 Internal Road Network

The internal road network consists of a gravel-surfaced internal access road within the security-fenced development area, designed for all-weather access by light-duty, service, and emergency vehicles.

- Minimum 6.0-metre clear width maintained for emergency vehicle access.
- Adequate turning radii and maneuvering space for maintenance trucks and emergency apparatus.
- Turnaround capability within the site to avoid reversing onto municipal roads.
- All-weather surface maintained for the life of the Facility.

5.2 Site Access

Figure 10 illustrates the preliminary regional and local access route to the Gayford Facility. Access will use the existing municipal road approach and shared private access serving the adjacent Ember Resources Ltd. compressor facility; no new permanent County-road approach is proposed. Road Use Agreement No. 26-0003-03 applies from March 1, 2026, to February 28, 2031, and the required \$50,000 security deposit has been paid and accepted by Rocky View County. The final haul route remains subject to County approval. Table 4 summarizes the preliminary access route.

Table 4: Site Access Route Summary

Segment	Road or access	Approximate distance	Surface and function
1	Township Road 263	7.4 km	Gravel - local and County access
2	Highway 21	4.8 km	Paved - provincial route
3	Township Road 270	10.2 km	Gravel - local and County access
4	Range Road 252	0.6 km	Gravel - final public-road approach
5	Ember access road and lease	0.12 km	Gravel - shared private access
Total	Mapped route segments	Approximately 23.1 km	Subject to County and carrier confirmation

-
- **Policy 5.2.1** As a condition of Development Permit, the developer is required to enter into an access easement agreement with the existing approach user.

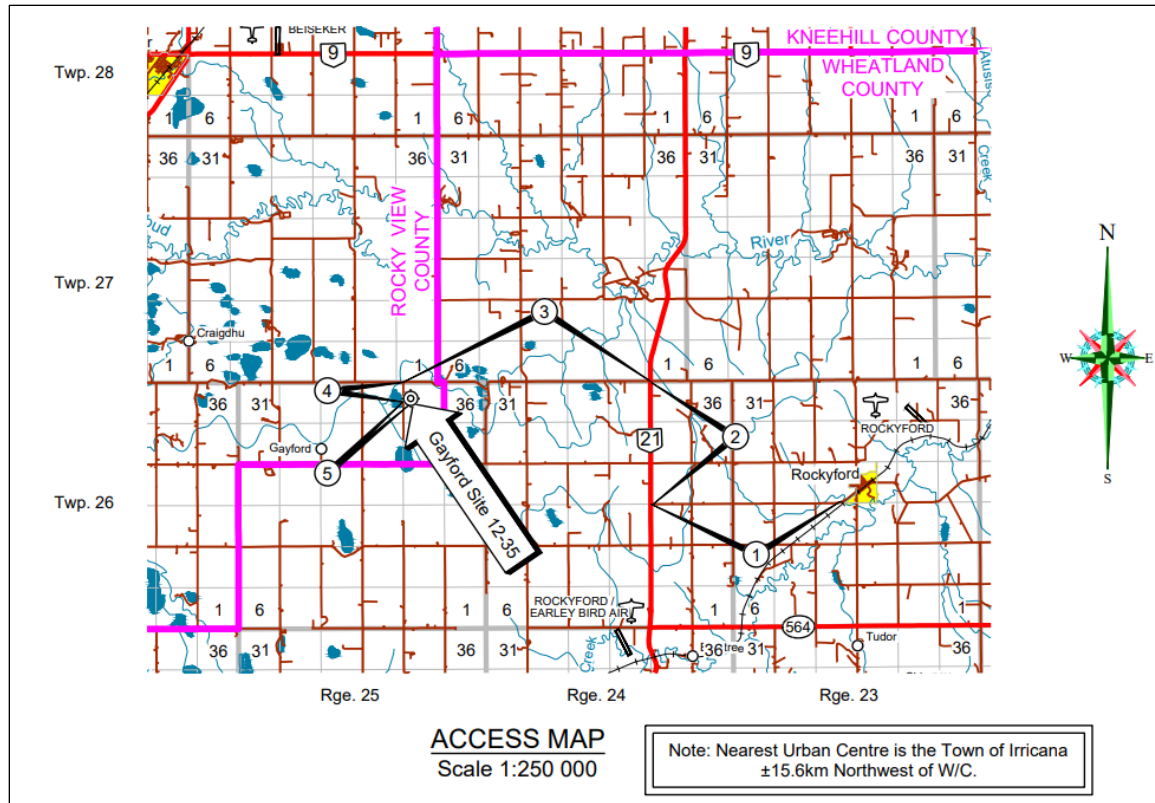


Figure 10: Site Access Route Map

5.3 Emergency Access

The site will be designed to accommodate emergency access and response requirements through the provision of a minimum 6.0-metre wide, unobstructed internal access route always maintained. The site entrance gate will include emergency responder access provisions, such as a breakaway lock or access code registered with the local fire department. On-site turnaround areas will be incorporated to allow fire apparatus to maneuver safely without reversing onto municipal roads. Clear and visible signage will be installed at the site entrance identifying the facility operator, 24-hour emergency contact information, hazard identification, emergency shutdown locations, and designated muster points.

- **Policy 5.3.1** As part of the Development Permit stage, the developer is required to coordinate with Rocky View County Fire Services to establish appropriate emergency access provisions, including the installation and registration of a lock box or other approved access system to ensure emergency responders can access the site.

5.4 Traffic Impact Assessment

A Traffic Impact Assessment memorandum has been completed for the Gayford Facility based on the proposed development, operating profile, access arrangement, and applicable Rocky View County road-use requirements. The Facility will have no public access or permanent on-site staff. Normal operations are expected to generate approximately 1 to 3 maintenance, inspection, or service visits per day, equivalent to approximately 2 to 6 one-way vehicle trips per day.

Natural gas will be supplied by pipeline, eliminating routine fuel-delivery trips. Operational traffic will therefore remain low and is not expected to require improvements to the surrounding road network. Vehicles will use the existing approach and shared access, with on-site turnaround space allowing forward entry and exit.

Construction traffic will be temporary and will include worker vehicles, service vehicles, material trucks, equipment deliveries, and oversize or overweight loads. Typical construction staffing is expected to be approximately 10 persons per day, increasing to up to 15 persons per day during peak installation and commissioning. Project-related heavy vehicles will use only the Designated Transport Route approved in writing by Rocky View County under Road Use Agreement No. 26-0003-03.

Construction hauling will be subject to the Road Use Agreement, applicable permits, the approved transport schedule, required road inspections, and County authorization. The Agreement applies from March 1, 2026, to February 28, 2031, and includes a refundable \$50,000 security for potential road damage and dust-control costs.

Given the low operational trip generation, use of the existing access, absence of routine fuel deliveries, and construction controls established through the Road Use Agreement and applicable permits, the development is not expected to create a material long-term traffic impact.

5.5 Construction Management Plan

Construction management requirements will be refined through the Development Permit process. The Construction Management Plan will address construction staging, traffic and delivery coordination, dust control, erosion and sediment control, temporary stormwater management, waste handling, construction hours, noise mitigation, site security, and emergency contacts, consistent with the Traffic Impact Assessment and applicable County requirements.

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- **Policy 5.5.1** As a condition of Development Permit, the developer is required to submit a Construction Management Plan prepared in accordance with the County Servicing Standards including weed management, traffic accommodation, and dust control, etc., as necessary, to the satisfaction of the County.

Section 6.0 – Servicing

The proposed Gayford Facility is a low-intensity, industrial energy development designed to operate without permanent municipal water or wastewater service. Consistent with its limited occupancy and rural setting, the facility has been planned to minimize water use and avoid the need for municipal infrastructure extensions. Servicing requirements will be restricted to supporting periodic maintenance activities and temporary construction operations, with no permanent building occupancy. The proposed approach ensures compatibility with the rural servicing context of Rocky View County while maintaining protection of adjacent environmental features and limiting overall infrastructure demands.

6.1 Water Supply

The Gayford Facility does not require a permanent municipal water connection. Potable water demand will be minimal and limited to construction activities and periodic maintenance personnel, consistent with the low-intensity operational profile of the facility. Potable water will be supplied through temporary transported sources (e.g., bottled water or delivery services) as required for construction crews or maintenance personnel, and no permanent potable water infrastructure is proposed.

- Construction phase: Transported potable water for construction crews, with portable sanitation facilities serviced by a licensed contractor.
- Operational phase: No permanent potable water infrastructure required; occasional maintenance personnel will utilize transported potable water as needed.
- Process water: No process water consumption is required, as the facility is designed as dry-cooled; no water well is anticipated.

6.2 Wastewater Management

No municipal wastewater servicing is required. Sanitary servicing will be provided through portable sanitation facilities during construction and operations, serviced by a licensed contractor in accordance with applicable public health standards. No process wastewater is generated during normal facility operations.

6.3 Stormwater Management

6.3.1 Existing Conditions

The site consists of flat to gently sloping agricultural land with natural sheet-flow drainage. Existing conditions feature permeable agricultural soils and no engineered stormwater infrastructure. Surface runoff drains toward surrounding agricultural lands and existing drainage pathways consistent with regional topography.

6.3.2 Post Development

Stormwater generated from the development will be managed through a combination of site grading and natural drainage approaches that maintain pre-development conditions. Runoff will be directed in a controlled manner across permeable gravel surfaces to promote localized infiltration, with additional short-term surface storage provided within the gravel equipment yard during storm events. Drainage patterns will be maintained to align with existing natural pathways, ensuring that post-development runoff rates and volumes do not exceed pre-development conditions.

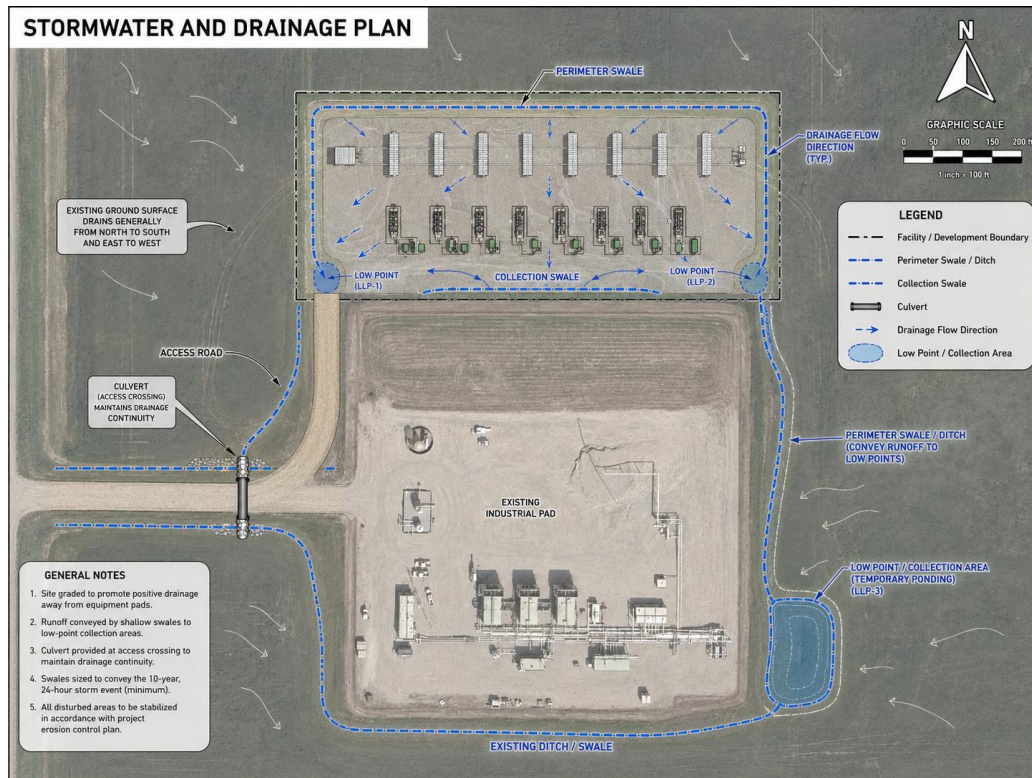


Figure 11: Drainage and Stormwater Plan

- **Policy 6.3.1** As a condition of Development Permit, the developer is required to submit a Stormwater Management Plan addressing pre- and post-development conditions and must be prepared by a Qualified Professional.

Section 7.0 – Development Standards

The following design guidelines establish the development standards applicable to the Gayford Facility within the Direct Control District. These guidelines will be incorporated into the Direct Control Bylaw and enforced through the Development Permit process.

7.1 Building Layout and Heights

- Generator units: maximum height of 10.5 m above finished grade, in accordance with manufacturer specifications.
- Data processing containers: modular ISO shipping container heights of approximately 2.6 m to 2.9 m.
- SCR emission control stacks: maximum height as specified in the EPEA Industrial Approval and AUC approval documents.
- Security fencing: maximum height of 2.8 m above finished grade.
- Overall structure height: maximum height of 10.5 m above finished grade within the DC boundary, unless otherwise approved through the Development Permit process.

Figure 7 shows the proposed Gayford site plan, including the arrangement of generator units, modular data processing containers, internal access, security fencing, and supporting infrastructure within the development footprint.

7.2 Lighting

Exterior lighting for the facility will be designed to comply with Rocky View County dark-sky lighting principles and all applicable provisions of the Land Use Bylaw. Lighting will be minimized and targeted to areas where illumination is required for operational safety and security. Fixtures will consist of industrial-grade, dark-sky compliant LED lighting and may include fully shielded area lights, wall-mounted fixtures, and low-profile pole-mounted lights for circulation areas. All lighting will be fully shielded and directed downward to ensure illumination is confined to intended surfaces only. Fixture selection and design will eliminate upward light emission, prevent horizontal light spill beyond the site boundary, and minimize glare and sky glow. Shielding and proper orientation will be employed to ensure that lighting does not adversely affect adjacent properties or the surrounding rural environment.

Lighting fixtures mounting heights will be appropriate to the operational needs of the facility while limiting off-site light trespass. In general, building- or equipment-mounted fixtures will be installed at heights of approximately 4 to 6 meters, while pole-mounted fixtures, where required, will typically range from 6 to 8 meters.

7.2.1 Lighting Operation

Lighting for the Gayford Facility is designed to align with its low-occupancy, highly automated operations. Illumination will be used on an as-needed basis, primarily to support nighttime

maintenance activities, emergency response situations, and limited operational requirements. The facility is largely automated and does not require continuous nighttime staffing.

Security lighting for the facility will be strategically installed at key access points to support site safety and security, including entry gates, equipment access areas, and perimeter monitoring locations. The design and placement of security lighting will balance operational safety requirements with the need to minimize light spill and overall nighttime illumination.

7.2.2 Dark-Sky Compliance

The proposed lighting plan aligns with Rocky View County's dark-sky principles through the use of fully shielded fixtures, downward-directed illumination, and lighting levels appropriate to the rural context. Lighting will be limited in both intensity and coverage and provided only where required for operational or safety purposes, ensuring minimal impact on the surrounding landscape and the nighttime sky.

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- **Policy 7.2.1** As a condition of Development Permit, the developer is required to submit a Lighting Plan, including fixture type, manufacturer, model, specifications, mounting height, shielding details, and photometric analysis demonstrating compliance with Rocky View County dark-sky principles and minimized light trespass onto adjacent properties.
 - **Policy 7.2.2** All lighting shall be designed to eliminate upward light emission and shall be consistent with the requirements of the Rocky View County Land Use Bylaw. Installation of all exterior lighting shall be carried out in accordance with the approved Lighting Plan as a condition of Development Permit approval, prior to occupancy.

7.3 Parking

Parking for the facility has been designed to reflect its low-occupancy and secure operational nature. A minimum of two gravel-surfaced parking stalls will be provided on-site to accommodate maintenance personnel, with no public parking required. All parking areas will be located within the security-fenced perimeter and outside of required setbacks. The site layout also incorporates sufficient space to allow for safe vehicle maneuvering and on-site turnaround.

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- **Policy 7.3.1** As a condition of Development Permit, the developer is required to submit a Parking Plan, including the location, design, number of parking and loading areas, surface materials, and compliance with applicable standards. All required parking and loading areas shall be constructed prior to occupancy.

7.4 Landscaping

Landscaping for the Gayford Facility has been designed to maintain visual compatibility with the surrounding rural agricultural landscape while supporting safe and secure facility operations. Given the infrastructure-oriented nature and limited footprint of the development, landscaping

measures focus on maintaining a clean and orderly site interface, stabilizing disturbed soils, and minimizing visual impacts from adjacent lands and nearby roadways. All fencing, vegetation, and screening measures will be maintained for the life of the facility, while ensuring that landscaping does not interfere with operational safety or maintenance access.

7.4.1 Species Selection

Native and drought-tolerant plant species appropriate to the central Alberta region will be used, while invasive or non-native species will be avoided. Vegetation selection will prioritize native grasses, drought-tolerant species, and plant varieties that are locally adapted to the central Alberta region. Existing vegetation and shelterbelts outside the development footprint will be retained where possible to preserve the existing landscape character.

7.4.2 Fencing Interface

A security fence will be installed around the development footprint to ensure safe operation of the facility and to restrict unauthorized access.

The fence will typically consist of:

- industrial-grade security fencing
- controlled access gates for maintenance and emergency access
- fencing heights consistent with industrial safety standards.

7.4.3 Berming and Visual Screening

Visual screening will be incorporated around the proposed development to reduce views of the facility from Range Road 252 and adjacent properties. As conceptually illustrated in Figure 12, Figure 13, Figure 14 and Figure 15, screening may include a layered combination of evergreen and deciduous trees, shrubs, native grasses, and localized low earth berms where practical.

The landscaping will be positioned to soften the appearance of the equipment, fencing, and supporting infrastructure while maintaining required access, safety clearances, utility setbacks, and existing drainage patterns. Final planting locations, species, densities, and maintenance requirements will be confirmed through the Landscaping Plan submitted at the Development Permit stage.

Note: Conceptual visualizations are provided for illustrative planning purposes only and have been prepared based on the current concept site plan. They are not intended for construction.

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- **Policy 7.4.1** As a condition of Development Permit, the developer is required to submit a Landscaping Plan, including plant species selection, maintenance approach, and any screening measures. All required landscaping shall be installed in accordance with the approved Development Permit requirements prior to occupancy.



Figure 12: Conceptual Aerial Rendering of the Gayford Facility and Proposed Landscaping



Figure 13: Conceptual View Looking East from Range Road 252 Showing the Proposed Western Landscaping Buffer



Figure 14: Conceptual Oblique View of the Gayford Facility and Perimeter Landscaping



Figure 15: Conceptual Northeast Oblique View of the Gayford Facility and Perimeter Landscaping

7.5 Noise Mitigation

Noise management for the facility has been incorporated into the equipment selection and site design to ensure compliance with applicable regulatory standards. The overall layout has been designed to meet the Alberta Utilities Commission (AUC) Rule 012 Permissible Sound Levels of 40 dBA LeqNight at all sensitive receptors.

A Noise Impact Assessment has been completed by ACI Acoustical Consultants Inc., confirming that modelled noise levels remain below the applicable limits at all theoretical receptors within 1,500 metres of the site. The assessment concluded that the project is compliant with AUC Rule 012 and that no additional noise mitigation is required.

7.6 Hazard Management

Hazardous materials management for the facility will be undertaken in accordance with applicable provincial legislation and Rocky View County requirements to ensure the safe handling, storage, and disposal of all materials. Facility operations will be conducted to control air emissions and prevent unauthorized releases of hazardous substances in accordance with the applicable EPEA Industrial Approval, approved monitoring plans and other provincial requirements. Any toxic or hazardous materials associated with the development will be managed in compliance with regulatory requirements and in accordance with an approved management plan.

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- **Policy 7.6.1** Handling, storage, and disposal of any toxic, hazardous materials shall be in accordance with the regulations of any government authority having jurisdiction and in accordance with any Chemical Management Plan that may be required by the County.

7.7 Agricultural Boundary Design Guidelines

Agricultural boundary considerations have been integrated into the site design to minimize potential land use conflicts between the proposed development and surrounding agricultural operations. The development footprint will be strictly contained within the plan boundary, which will be clearly delineated with perimeter fencing. Activities, including the storage of materials, equipment, and waste, will be limited to within the fenced area unless otherwise approved by Rocky View County.

Existing agricultural infrastructure outside the development footprint will be preserved in their current condition, with any disturbances repaired to the satisfaction of the County and affected landowners. Dust control measures will be implemented on access roads and internal circulation routes to reduce impacts on adjacent agricultural uses, and topsoil will be carefully managed, stockpiled within the site, and protected until reclamation.

Section 8.0 – Emergency Response

8.1 Fire Containment

8.1.1 Fire Prevention Design

The Facility will incorporate fire prevention measures through code-compliant equipment design, preventive maintenance, thermal scanning, housekeeping, hot-work controls, emergency shutdowns, fuel isolation, and electrical protection systems. Hazardous materials will be stored with appropriate containment and managed in accordance with applicable Safety Data Sheets and site spill response procedures.

8.1.2 Fire Suppression

Emergency equipment, including fire extinguishers, first aid supplies, AEDs, spill kits, eyewash stations, safety showers, emergency lighting, radios, and phones, will be maintained on site in accordance with the ERP. In the event of a fire or explosion, personnel will activate alarms, call 911, evacuate, isolate electrical and gas sources where safe, and transfer command to the responding fire department.

8.1.3 Wildfire Interface

Wildfire and grassfire risk will be reduced through gravel surfacing, vegetation management, and defensible space around the fenced facility. The ERP requires personnel to call 911, close air intakes where safe, implement fire-smart measures only where safe, evacuate as directed, and coordinate with local emergency services, including Rocky View County Fire Services where required.

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- **Policy 8.1.1** Any fire, explosion, uncontrolled release, or other reportable emergency shall be managed and reported in accordance with the site-specific Emergency Response Plan and applicable regulatory requirements. Where requested by the County, the developer shall provide a summary of the incident, response actions, corrective measures, and measures implemented to prevent recurrence.

8.2 Emergency Response Hierarchy

The Facility will operate in accordance with the site-specific Gayford Natural Gas Power Generation Facility Emergency Response Plan (ERP), which establishes procedures for emergency readiness, evacuation, incident command, communications, training, equipment, and regulatory notification.

8.2.1 Incident Command Structure (ICS)

Incident command will be led by the Site Manager, supported by the HSE Lead or Safety Officer, Shift Lead or Operations Lead, designated first aid personnel, and the Community Liaison or Public Information Officer for external communications.

8.2.2 Emergency Response Notification Hierarchy

Emergency responses will prioritize life safety, evacuation, personnel accountability, alarm activation, 911 notification, internal notification, safe isolation of hazards, spill or fire containment where trained and safe, and required external reporting. Reportable releases, serious injuries, fatalities, unplanned explosions, or other regulated incidents will be reported to the appropriate provincial authorities and coordinated with Rocky View County Fire Services as required.

8.2.3 Pre-Operations Coordination

Prior to commissioning, the Applicant will coordinate with local fire and emergency services to confirm emergency access, gate entry, shutdown/isolation points, emergency equipment locations, evacuation routes, muster points, and emergency contacts. Personnel and contractors will receive ERP orientation, with drills and exercises completed in accordance with the ERP.

The Facility will be continuously monitored through remote operational and safety monitoring systems capable of identifying abnormal operating conditions, equipment alarms, loss of communications, fire-related alarms, gas-system faults, electrical faults, and emergency shutdown events. Alarm notifications will be transmitted to designated qualified personnel authorized to assess the condition, initiate a controlled shutdown where required, and dispatch local personnel or emergency responders.

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- **Policy 8.2.1** Prior to commissioning, the developer shall submit an Emergency Response Plan identifying the remote monitoring systems, alarm escalation process, emergency contacts, response responsibilities.

Section 9.0 – Public Consultation

Public consultation for the proposed Gayford Facility was completed to support the land use redesignation application, the municipal planning review process, and the related Alberta Utilities Commission participant involvement requirements. The consultation program was intended to ensure that adjacent landowners, occupants, nearby residents, interested parties, business operators, Indigenous screening interests, and Rocky View County were provided with clear information about the proposed facility and had an opportunity to ask questions or identify concerns before regulatory filing and municipal approval review. The PIP identified a 2,000 m notification area and an 800 m consultation area, consistent with the project being treated as a thermal power plant greater than 10 MW for AUC Rule 007 purposes.

Consultation activities included registered mail notification packages, hand-delivered project information where appropriate, email notification to Rocky View County, telephone and voicemail follow-up, direct one-on-one meetings with landowners and occupants, provision of updated Project information, distribution of AUC public involvement materials, and documentation of stakeholder responses in the consultation record.

9.1 Consultation Timeline

Initial notification and engagement began in September 2025 and included direct meetings with the host landowner and occupant, notification to nearby landowners and interested parties, and email notification to Rocky View County. Follow-up and updated notification activities were completed in February 2026, including updated project information letters, AUC public involvement materials, and additional meetings with landowners and occupants. In March 2026, the Project team completed follow-up with Roger McNair regarding questions about construction timing, site security, and the detailed site plan. In April 2026, additional follow-up was completed with Crooked Creek Farms Ltd. and Ludwig Reichenied / Rockyview Tubers, including provision of project materials and discussion of farming-related and technical questions.

9.2 Issues Raised and Project Responses

Most stakeholders raised no concerns or signed confirmations of non-objection following notification or direct discussion. The principal issues raised were informational and operational in nature. Roger McNair requested additional information regarding the anticipated construction timing, whether the site would include security measures, and whether a detailed site plan or survey plan could be reviewed. Follow-up was completed, the survey plan was provided and discussed, and the Project team confirmed that the site would be fenced and monitored with cameras. Ludwig Reichenied / Rockyview Tubers advised that he did not object to the Project at the time of consultation but requested further information before signing written non-objection. His questions related to potential interaction with farming operations,

pivot irrigation, aerial spraying, potato hauling, heat and exhaust direction, equipment specifications, concept drawings, road access, and construction timing.

9.3 Consultation Results

Overall, the consultation record demonstrates that the Project team identified and notified relevant stakeholders, provided updated Project information and AUC public involvement materials, completed direct follow-up where questions were raised, and documented stakeholder responses. The host landowner and occupant indicated no concerns and signed confirmations of non-objection. Several nearby landowners and interested parties also indicated no concerns or signed confirmations of non-objection following updated project meetings. A limited number of stakeholders requested further information, and those items have been addressed or remain subject to reasonable ongoing follow-up as additional technical and operational information becomes available. Table 5 summarizes the key public consultation activities, stakeholder comments, and Project responses.

Table 5: Public Consultation Summary

Date / Period	Engagement Format	Stakeholders	Comments / Concerns	Response / Outcome
Sept. 5–10, 2025	Initial letters, County email, and direct meetings.	Landowners, occupants, and Rocky View County.	No major concerns; some letters signed.	Initial notification completed.
Feb. 17–26, 2026	Updated letters, AUC pamphlet, and County email updates.	Landowners, occupants, and County.	No County concerns noted.	Updated notification completed.
Feb. 21–24, 2026	One-on-one meetings.	Putnam, Thurston Bros., Appleyard, Sandhill, and Stahlville stakeholders.	No concerns raised.	Non-objection confirmations obtained.
Mar. 4–28, 2026	Calls and in-person meetings.	Roger McNair / 77M Cattle Company representatives.	Questions on construction timing, security, and site plan.	Survey plan discussed; fencing and camera monitoring confirmed.
Apr. 8–10, 2026	Direct contact and in-person discussion.	Ludwig Reichenied.	Questions on farming operations, equipment, road timing, heat, and exhaust.	Information letter and survey provided; follow-up information requested.
Apr. 10, 2026	One-on-one meeting.	Crooked Creek Farms Ltd.	No concerns raised.	Non-objection signed.
Consultation record	Indigenous screening.	Indigenous groups.	No associated groups identified.	No Indigenous notification identified as required.

Section 10.0 – Implementation and Monitoring

10.1 Development Compliance

All conditions of the Development Permit (and any related municipal approvals) will be tracked and implemented through a project compliance checklist. Responsibilities will be assigned for each condition, and completion will be documented through drawings, inspection records, and contractor signoffs as applicable. Where required, the Applicant will provide confirmation of compliance to the Development Authority at key milestones (e.g., pre-construction, commissioning, and post-construction).

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- **Policy 10.1.1** Prior to operation, the developer shall establish and maintain an Operational and Compliance Monitoring Plan identifying the parameters to be monitored, alarm and response thresholds, inspection and maintenance requirements, responsible personnel, record-retention requirements, and applicable reporting obligations.

10.2 Environmental Monitoring

Environmental performance will be managed through ongoing monitoring and operational controls consistent with the project's compliance approach. Commitments may include:

Noise: maintenance of noise mitigation measures and, where required, post-construction verification testing to confirm continued compliance with AUC Rule 012 permissible sound levels.

Air emissions: operation and maintenance of emissions controls (including SCR) and compliance verification through monitoring and reporting requirements. Air dispersion modelling confirmed that predicted ground-level NO₂ concentrations comply with the applicable Alberta Ambient Air Quality Objectives and indicate no significant air quality concerns.

Digital monitoring: implementation of the Predictive Emission Monitoring System (PEMS) monitoring framework, including QA/QC procedures, validation activities as required, and auditable outputs to support compliance reporting.

Spill prevention: routine inspections, housekeeping, and incident response readiness (spill kits, procedures, reporting, and remediation).

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- **Policy 10.2.1** The developer shall maintain a Protocol applicable to noise, air emissions and other operational impacts. The protocol shall identify investigation, mitigation, shutdown, notification, follow-up verification and recordkeeping requirements.

10.3 Maintenance of Landscaping

Visual and interface mitigation features will be maintained throughout the life of the project to ensure their continued effectiveness. This will include regular inspection and maintenance of berms and associated drainage tie-ins to address any erosion, settlement, or washouts; replacement of damaged or dead vegetation and implementation of weed control measures as required; and ongoing upkeep of fencing, gates, and lighting systems. Corrective maintenance will also be undertaken following significant storm events or any site modifications to preserve the intended mitigation outcomes.

10.4 Record Retention

Records will be retained to support regulatory compliance, operational oversight, and municipal verification as required. Recordkeeping will include, as applicable:

- Development Permit condition tracking and close-out documentation;
- Monitoring outputs (noise/air/PEMS), QA/QC logs, and maintenance records;
- Spill/incident logs and corrective action documentation;
- Landscaping/berm inspection and maintenance logs; and
- Any correspondence or approvals/clearances required for construction and operation.

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- **Policy 10.4.1** The developer shall maintain a complaint-response record containing the date and nature of the concern, relevant Facility operating conditions, investigation completed, findings, corrective actions, communications with the complainant, and date of resolution.

Section 11.0 – Decommissioning and Reclamation

Decommissioning and reclamation will be undertaken in accordance with the Gayford Decommissioning, Disassembly, Salvage and Reclamation Plan, and will be triggered by prolonged cessation of operations, permanent closure, expiry or revocation of regulatory approvals, or direction from Rocky View County. An operating life of 15 years has been assumed for estimating purposes. The closure area is the surveyed footprint (1.815 ha plant site and 0.091 ha access road), and the scope covers the nine engine-generator units, modular data processing containers, electrical, gas and mechanical systems, foundations, and site infrastructure, with salvage credited against removal costs where recovery is supported. Reclamation will return the Project area to a condition suitable for agricultural use or tame pasture, coordinated with the decommissioning sequence to avoid rework.

An estimate has been prepared from the plant layout, surveyed area, equipment inventory, and material quantities, using 2024–2025 Canadian labour, handling, and disposal rates, with salvage credited only where meaningful recovery is expected.

Table 6: Decommissioning and Reclamation Security Estimate

Estimate Component	Amount (CAD)
Decommissioning, net of \$160,945 salvage	\$1,120,000
Administration allowance (10%) and overbuilt buffer (15%)	\$280,000
Reclamation (1.906 ha, approx. \$209,850/ha)	\$399,975
Combined security	\$1,799,975