

Peace River Regional District  
P.O. Box 810  
1981 Alaska Avenue  
Dawson Creek, BC V1G 4h8

September 9, 2020

**Attention: Michael Blatz, Land Use Planner**

**Re: Tourmaline Oil Corp. Temporary Use Application - Work Camp**

Tourmaline Oil Corp. (Tourmaline) is hereby applying for a Temporary Use Permit (TUP) for the purpose of constructing a Tourmaline owned, closed, dry 144 man work camp on private land (DL 2485) that is directly off the Beaton River Airport Road, at Km 79. The site is an existing clearing that has previously been used as a forestry tree planting camp, and then as an oil & gas worker campsite by Chinook Energy (2010) Inc. Tourmaline is applying for the TUP for a three-year term. The site location is in the Birley/Umbach area approximately 109kms northwest of Fort St. John.

This camp location was previously in use by Tourmaline Energy (2010) Inc. Please note Tourmaline acquired all of the outstanding shares of Chinook Energy (2010) Inc. on February 14, 2020. As such, Chinook Energy is now a wholly owned subsidiary of Tourmaline. It is anticipated that Chinook Energy and Tourmaline will amalgamate on or about December 31, 2020. Tourmaline has full authority to apply and work on behalf of Chinook Energy.

Tourmaline is focusing on the development of the Montney formation in the Birley/Umbach area of northeastern British Columbia. Tourmaline has substantial mineral land holdings in the area and has multi-year plans to develop those minerals. Tourmaline's minerals are located off the Birley road, approximately 4km north of the proposed camp site. The Birley road is a privately maintained and radio-controlled road, used almost exclusively by oilfield traffic.

To date Tourmaline has been in the exploration phase of its Birley asset, and the proposed camp would help facilitate Tourmaline moving into the development phase of its property.

In order to be able to, cost effectively, and safely enter the development stage for those minerals Tourmaline requires the ability to house its' drilling, completions, facility construction workers and employees directly in our area of operations. There are several reasons why Tourmaline requires the ability to house its workers in our area of operations and those reasons are outlined below:

- During winter conditions, the Beaton River Airport Road can be very rough with lots of oilfield traffic. This increases the accident risk to our workers of having to commute from Fort St. John, which in the winter can be up to 2 hours one way. There is limited cellular service along the Beaton, so in the event of an accident, or even sliding into the ditch can make emergency response a significant challenge. Having a camp would work to mitigate those unnecessary risks for our contractors and workers.

- As a result of the length of the commute, and the nature of drilling operations being 24 hour operations, Tourmaline would be required to run three 8 hour drilling crews instead of the standard two 12 hour crews, to account for the commute to and from Fort St. John. This would impose significantly more vehicle trips adding to the stress on the transportation infrastructure on the highway and local road networks. Further, this would work to increase the costs of our drilling operations materially, and in a time of depressed commodity prices, our capital budget can't support this type of operation. With no work camp Tourmaline would experience a material limitation in its ability to develop its assets and grow as a company, which would negatively affect stakeholders and shareholders of Tourmaline.
- Housing workers in our area of operations allows for better response times in the event of an emergency, as we would have the necessary medical and technical people in the immediate area to respond to an emergency.
- Being that Tourmaline's proposed camp is a dry camp, it also provides a better ability for the company to ensure its staff and workers are in compliance with our health and safety policies. Commuting to and from Fort St. John opens up the ability for contractors or workers to be in breach of our health and safety policies and could potentially create risks for the broader public.
- During storms or bad weather, the Beatton River Airport Road can become almost impassable, which can put our operations and personnel at risk, should a shift change not be able to effectively take place. This could involve having to shut down operations, which carries with it numerous safety risks, and serves to further escalate costs.

Tourmaline can offer the following further details about our proposed work camp:

#### **Water**

Tourmaline intends to test the existing water well on site, to determine if the quality and volume are viable for use. If the well is not satisfactory Tourmaline will utilize water from a nearby existing water source dugout. This helps to reduce traffic from hauling water from Fort St. John and helps reduce the stress on the water system of the city. Tourmaline will obtain the required permits from Northern Health and the Ministry of Forest Land Natural Resource Operations permitting the diversion of well water volume required by the camp and ensuring the quality of treated water exceeds that required by Northern Health. The potable water plant will be maintained and operated by a certified trained technician as directed by Northern Health.

#### **Sewer**

Tourmaline plans to truck out the sewage volume generated by the camp.

#### **Transportation**

Chinook Energy retained McElhanney Consulting Services Ltd. (McElhanney) in October of 2016 to complete and Traffic Impact Analysis for our proposed camp. The conclusion of their report was that having a work camp in the subject area of operations would not only have minimal impact on the road network of the PRRD, it would actually serve to improve the operational and safety aspects of the highway network by displacing commuter traffic. As the majority of Tourmaline's operations in the area will be winter based, any commuting would largely be done during hours of darkness which would further increase the risks to staff and contractors.

Due to the fact that most operations are conducted during the winter months, there is minimal issues with dust control on the Birley or Beatton roads. Any work completed during summer would largely be directly off the Birley road itself, and dust control measures such as water trucks would be implemented. Further, the Birley road is a radio-controlled road, which helps anticipate oncoming traffic, allowing for reduced speeds when vehicles are passing, which reduces dust related safety issues.

**Housing**

Tourmaline's camp would consist of a number of all-weather, Canadian manufactured, skidded modular complexes and utilities equipment. In particular, there will be a 7-unit kitchen/dining/management office complex with the ability to seat 130 people and offers men's and women's washrooms. We plan to have 144 single occupancy bedrooms; two 49-bed craft dorms, one 30-bed executive style dorm, and 4 individual wet sleeper units. Guests will enjoy private washrooms, in-room satellite entertainment, carpeted common areas and lockable cabinetry. Services for the camp will be connected to withstand the elements and mitigate spill risk, whereby each complex will tie into our potable water plant, sewer plant, diesel generators for power, and LPG bullets for heating. We will provide a fuel card lock station for vehicles, and associated parking.

**Policing**

Tourmaline's camp has a staff of approximately 10 people with an onsite Camp Manager. The nature of Tourmaline's operations being largely 24-hour operations when the camp is manned, helps reduce the need for onsite security personnel, as all workers present in the area, and at the camp are either directly or indirectly employed by Tourmaline. Further, the fact that the camp is a dry camp helps to reduce any potential associated issues with drug or alcohol consumption. There are no weapons allowed in Tourmaline's camp and hunting is strictly prohibited. As there are no residences within 1500m of Tourmaline's site so we do not anticipate any offsite issues, or issues with noise. Due to the remote location and the fact the camp is proposed on a private land, we do not anticipate any issues requiring any police response.

**Social**

Tourmaline will have two onsite medics at the camp 24 hours a day. Those medics are qualified to handle most minor procedures and are capable of making any medical related decisions with respect to evacuating a patient or seeking further care.

**Reclamation**

As Tourmaline's site is on private land and an existing clearing that has been used as a forestry camp in the past, Tourmaline has committed to the landowner to leave the land as we have found it. All Tourmaline camp buildings would be demobilized from the site, and all above ground equipment removed. Tourmaline would then restore the land to the satisfaction of the landowner, and to the conditions required by any applicable legislation.

**Solid Waste**

Tourmaline will have recycling bins at the camp site. All other garbage will be stored in animal proof steel bins. Once the bins become full, cardboard recycling will be delivered to the Eco-Depot recycling center in Fort St. John. Garbage will be periodically trucked off-site for disposal at the Fort St. John Landfill. Beverage containers will be collected and removed from camp via grocery truck and recycled at their distribution hub.

**Emergency Management**

Tourmaline has comprehensive health and safety policies in place that govern the conduct at its camp. Further, Tourmaline has in place with OGC a Corporate Emergency Response Plan (ERP) which outlines our response to emergency situations, whether they be oilfield related, or personal injury. In accordance with that plan if the situation were of such a nature as notification to a local or provincial government agency was required then Tourmaline would communicate with the applicable agency in accordance with our ERP. Tourmaline has obtained certification that all fire extinguishers and hood suppression systems meet provincial fire code.

**Communications**

Tourmaline's proposed camp would use satellite internet as well as a cell signal boosting tower which would help to facilitate safe communications in this remote area. Further, contractors and employees are equipped with radio communications, which is the dominant form of communication in the area. Without a cell signal booster, there isn't sufficient cell service in the area. The fact that radio is the dominant form of communication and the internet is satellite provided; there is minimal impact to local communication infrastructure.

**BC Assessment**

Notification has been sent to BC Assessment informing them of our proposed camp, the size of the camp and our intent to file with the PRRD for a TUP.

While Tourmaline recognizes there have been a number of camps, substantially larger than what we are requesting, built throughout the PRRD and that this has created challenges for the PRRD in a number of areas, Tourmaline believes that installing a work camp for our operations will actually minimize a number of those challenges, as we have identified above.

We hope the above explanations satisfy any questions you may have with respect to Tourmaline's proposed camp. However, should you have further questions or require additional information, we would be pleased to hear from you at your convenience. We look forward to your decision on our TUP application in due course.

Sincerely,

**Tourmaline Oil Corp.**



For

Per: Brett Norrie  
Senior Surface Landman