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March 31, 2022

Pauline de Jong
Regulator
Office of the Regulator of Oil and Gas Operations
PO Box 1320, Yellowknife, NT X1A 2L9
orogo@gov.nt.ca

Dear Pauline de Jong:

RE: 2022 Annual Environmental Report for Cameron Hills, NWT – OA-2018-003-SOG

As you are already aware, on January 28, 2020, the Court of Queen's Bench of Alberta granted an Order pursuant to section 243 of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3 and section 13(2) of the Judicature Act, RSA 2000, c.J-2, whereby Alvarez and Marsal Canada Inc. (the "**NWT Receiver**") was appointed Receiver, without security, of all of Strategic Oil and Gas Ltd. and Strategic Transmission Ltd. (collectively, "**Strategic**" or the "**Company**") current and future assets, undertakings and properties of every nature and kind whatsoever situated in the Northwest Territories, including all proceeds thereof and including, without limited in the generality of the foregoing, any letters of credit issued in respect of assets situated in the Northwest Territories (the "**NWT Property**"). For further information, please visit the NWT Receiver's website at: www.alvarezandmarsal.com/sog.

The NWT Receiver, in consultation with and reliance of their third-party consultants hereby submits a digital copy of the Company's Annual Environmental Report for Cameron Hills to the Office of the Regulator of Oil and Gas Operations pursuant to section 86 of the Oil and Gas Drilling and Production Regulations, Operations Authorization OA-2018-003-SOG, and a letter from the NEB dated May 24, 2005 (NEB File 2620 D 4 7) and Environmental Assessment EA03-005. Hard copies of the attached report will follow via mail/courier upon request.

Should you require anything further, please contact the undersigned at dmacrae@alvarezandmarsal.com.

Yours truly,

Alvarez & Marsal Canada Inc.,
in its capacity as Receiver of Strategic Oil & Gas Ltd.
and Strategic Transmission Ltd.'s NWT Properties
and not it its personal or corporate capacity

Duncan MacRae
Vice President

Strategic Oil & Gas Ltd.
2022 Annual Environmental Report
Cameron Hills, NWT

Table of Contents

1.0 INTRODUCTION

1.1 Project Background

Strategic Oil & Gas Ltd. (Strategic) has been the operator of the Cameron Hills Gathering System and Facilities since February 2013 when Strategic acquired the operations from Paramount Resources Ltd. (Paramount). The Cameron Hills operations encompass:

- Oil wells
- Gas wells
- Winter access roads
- Summer all-terrain vehicle (ATV) trails
- Gas and oil gathering and measurement systems
- Central battery (H-03)
- Permanent camp
- Borrow pits
- Bridges
- Electrical distribution system

Approximately 15 km of steel pipeline (323.9 mm OD) was constructed in the winter of 2002 from the H-03 central battery (H-03 Facility) located in H-03 (60° 10′ N, -117° 30′ W) of the Northwest Territories to a pipeline header located at 05-24-126-22 W5M in Alberta. This multiphase pipeline transports sour natural gas and crude oil to an Alberta Energy Regulator regulated pipeline, which in turn transports the fluids to the Strategic Bistcho Lake Sour Gas Processing Plant located at 06-32-122-02 W6M in Alberta. This interprovincial pipeline is referred to as the Cameron Hills Transborder Pipeline.

The Cameron Hills gas gathering system comprises of a main 219.1 mm OD pipeline from A-73 (60° 20′ N, -117° 30′ W) to the H-03 Facility. There are a variety of 168.3 mm OD, 114.3 mm OD, and 88.9 mm OD pipelines that connect onto the 219.1 mm OD pipeline to gather sour natural gas from the gas wells to the H-03 Facility.

The Cameron Hills oil gathering system is comprised of 88.9 mm OD and 114.3 mm OD pipelines, mostly within 4 km of the H-03 Facility, which gather sour crude oil from the oil wells surrounding the H-03 Facility. The Cameron Hills Transborder Pipeline was deactivated and the gas gathering and oil gathering systems were discontinued in first quarter 2019.

On January 28, 2020, Alvarez & Marsal Canada Inc., was appointed receiver and manager ("NWT Receiver") over the assets and undertakings of Strategic located in the Northwest Territories pursuant to a court order of the Court of Queen's Bench of Alberta.

The Mackenzie Valley Land and Water Board (MVLWB) Land Use Permit (LUP) MV2013A0010 expired on September 18, 2020. The Cameron Hills Field was held under a Storage Authorization for 2 years starting September 17, 2020. LUP MV2022X0018 was 3 days from issuance as of December 31, 2022.

1.2 OROGO Reporting Requirements

Pursuant to Section 86 of the *Oil and Gas Drilling and Production Regulations*, OROGO Operations Authorization OA2018-003-SOG, NEB letter dated May 24, 2005 (NEB File 2620-D-4-7), and Environmental Assessment EA03-005, Strategic is required to submit annually the Cameron Hills Annual Environmental Report. For this Annual Environmental Report, the reporting period is January 1 to December 31, 2022. Table 1 summarizes the Operations Authorization reporting requirements for the Annual Environmental Report and references the corresponding location in this report.

Table 1 Annual Environmental Report Requirements

Operations Authorization Item	Condition	Report Location
11(a)	Confirmation that Parties to EA03-005 have received a copy of the annual environmental report or have been notified of its availability from Strategic.	Section 1.3
11(b)	The compliance status of: i) Developer commitments made during EA03-005 ii) Applicable EA03-005 measures to prevent significant adverse environmental impacts to the environment, and for any non-compliance iii) A plan for achieving compliance or the reasons why compliance cannot be achieved	Section 7.0
11(c)	Air quality standards and authorized limits of discharge (OGDPR paragraph 9(i)), used for the analysis of the data collected and reported as per Condition 7, including justification for these selections.	Section 3.1
11(d)	The monthly summaries of the data collected under Condition 7 above and its analysis.	Sections 3.2, 3.3, 3.4, 3.5, and 3.6
11(e)	A listing of all the events of exceedance of relevant air quality standards and/ or authorized limits of discharge (OGDPR paragraph 9(i)).	Sections 3.0 and 5.0
11(f)	The probable source, corrective actions proposed or undertaken for each exceedance identified in Condition 11(e).	N/A
11(g)	Post-flaring calculations for each flaring event to confirm that flaring rates did not exceed authorized limits of discharge (OGDPR paragraph 9(i)), and air emissions did not result in an exceedance of relevant air quality standards.	Sections 3.2 and 3.3
11(h)	Review and update of the Strategic *Air Emissions Mitigation Plan* in the event of changes to the field development scenarios or improvements in available mitigation technology.	Section 3.0
11(i)	A review and confirmation of the validity of the existing air dispersion modeling data, or, if warranted, a revised air dispersion model.	Section 3.0
11(k)	A listing of sites where erosion occurred and/ or sediment has entered a waterbody/ watercourse related to the Cameron Hills Field operations or construction, including, but not limited to a description of: i) the current status; and ii) the mitigation and remediation measures taken or proposed to be taken.	Section 4.0
11(l)	A listing of all known, suspected and remediated Cameron Hills contaminated sites, including, but not limited to a description of: i) the current status; ii) the clean-up end point; and iii) the action taken or proposed to be taken to assess, monitor or remediate the sites.	Section 6.0

1.3 Annual Environmental Report Distribution

Upon finalization and submission of the Annual Environmental Report to Office of the Regulator of Oil and Gas Operations (OROGO), the NWT Receiver will notify Parties to EA03-005 that the Annual Environmental Report is complete and available for distribution. EA03-005 Parties will be advised that the report is available either via email or through another form of notification such as a community newsletter.

2.0 OVERVIEW OF 2022 ACTIVITIES

In 2015, Strategic decided to shut down operations in Cameron Hills project area due to low market prices. Producing wells were shut in on February 17, 2015. Operations at the Cameron Hills H-03 battery were ceased on February 18, 2015 and the project remains shut-in to date. The Mackenzie Valley Land and Water Board (MVLWB) Land Use Permit MV2013A0010 expired on September 18, 2020. The Cameron Hills Field was held under a Storage Authorization for two years starting September 17, 2020.

While the Cameron Hills Field was held under a Storage Authorization with the Mackenzie Valley Land and Water Board, no abandonment, remediation, or reclamation activities could take place. The planned activities for 2022 were to ensure safety and security of the sites. A generator at the H-03 Facility is operating for plant vitals (i.e. cathodic protection). Contractors visit the area quarterly to refuel the generator, and visually inspect infrastructure at H-03 Battery. The annual sediment and erosion control survey was not done in 2022. Based on OROGO's inspection report, Strategic notified GNWT – Department of Lands in December 2022 of Emergency Access required to address potential gas migration issues at four sites. A detailed list of 2022 activities is provided in Table 2 below.

Table 2 2022 Work Scope and Locations

Scope of Work	Locations
Gas Migration Testing – no evidence of gas migration	Wellsites: M-74, F-73, 2F-73
Gas Migration Testing – evidence of gas migration	Wellsite: I-10, J-04, and M-31
Vegetation clearing (where required for safe helicopter landing)	None.
Genset Maintenance	Quarterly H-03 Battery
Cathodic Protection survey	Annually
Sampling and decanting	None
Access Construction	From AB border towards H-03 plant and wells requiring emergency access.

The most recent Environmental Inspection Reports from the Land Use Inspector are dated September 27, 2022 (for M-31) and October 12, 2022 (Cameron Hills Field). Once a new Land Use Permit is issued, Strategic shall continue to dispose of all garbage, waste, and debris as described in the approved Waste Management Plan, unless otherwise authorized, and shall clean up all leaks, spills, and contaminated material. In past years, additional details of work conducted have been included in Strategic's Annual Remediation Plan report dated July 31 of the prior year, which was reported to the Mackenzie Valley Land and Water Board and made available on the Board's Public Registry. While the Cameron Hills Field is held under a Storage Authorization, no remediation has taken place, so no report or plan has been provided.

3.0 AIR QUALITY

When operational, the Cameron Hills project collects crude oil and natural gas from the surrounding network of wells in the Cameron Hills region. The H-03 Facility separates the produced water, crude oil, and natural gas streams, and compresses the solution gas before transporting it by pipeline to Strategic's Bistcho Lake Sour Gas Processing Plant in Alberta for processing. The oil and the non-associated natural gas produced from the wells are transported to the gas plant through the same pipeline. High and low pressure flare stacks are located at H-03 Facility. H_2S leaks are monitored by detectors within the facility equipment to protect the health and safety of the working personnel.

As the Cameron Hills project has remained shut-in since February 2015, Strategic has not completed any updates on the *Air Emissions Mitigation Plan* or on any of the air dispersion modelling for the project.

Strategic undertakes to use the best available and economical technology, as well as industry accepted best management environment practices to support the philosophical goal to reduce emissions:

- Strategic's production plan includes no intentional venting of sour gas, as it contains H_2S. Where sour gas disposal is necessary, it is flared, burned or scrubbed before being released to the atmosphere.
- Strategic's strategy to assure its development complies with relevant air quality standards includes monitoring total sulphur emissions and ambient air monitoring. Strategic has committed to limit its sulphur emissions to 1 tonne of sulphur per day arising from the use of solution sour gas as fuel.
- Strategic's contingency plan for managing air emissions includes using alternate fuels, using alternate production methods (shutting in some or all production components at the facility), or enhancing emission dispersion by using a taller exhaust stack.

Historically the natural gas and crude oil associated with the Cameron Hills project contains between 0.66 and 3.4% H_2S[1].

3.1 Air Quality Standards

The AAQS adopted by GNWT (GNWT, 2014) under the NT *Environmental Protection Act* set maximum levels of SO_2 and NO_2 as a long-term air quality goal. Where NT standards were not available for a contaminant or averaging period, the appropriate AAAQO (AAAQO, 2013) are used.

[1] Based on the analytical results for Cameron Hills wells from 2007 to 2015 sampling events.

Strategic has agreed to use the standards summarized below as stated in the *Cameron Hills Air Emissions Mitigation Plan* (Strategic, 2013). The air quality standards adopted for the Cameron Hills operations field are presented below.

Table 3 Air Quality Standards

Time Average Period	SO_2 [(a)] (ppb_v)	NO_2 [(a)] (ppb_v)	H_2S [(b)] (ppb_v)
1 hour	172	213	10
24 hour	57	106	3
30 day	11[(b)]	-	-
Annual	11	32	-

Notes:
(a) *Guideline for Ambient Air Quality Standards in Northwest Territories (GNWT, 2014)*.
(b) *Alberta Ambient Air Quality Objectives, August 2013*. (Alberta Environment and Parks, 2016)

3.2 Total Sulphur Emissions

Strategic has committed to limit its sulphur emissions to less than 1 tonne/day. This limit has been adopted from the Alberta Energy Regulator's Directive 60 on flaring of gas from production facilities (Alberta Energy Regulator, 2018).

There was no solution gas used for fuel consumption in 2022. There were no emergency flaring events in 2022. As a result, there were zero sulphur emissions in 2022.

3.3 Flaring Events

The low pressure flare located at the H-03 Facility is a continuous flare that combusts discharge vapours from chemical pumps, production oil tanks and water tanks. The high pressure flare located at H-03 Facility is only used in emergency situations to depressurize the central battery. In 2022, there were no emergency flaring events.

3.4 Meteorological Monitoring at the H-03 Facility

Campbell Scientific installed a meteorological station (wind speed, wind direction, temperature, solar radiation, rainfall and relative humidity) at the Cameron Hills H-03 Facility on March 1, 2005. A report entitled *Cameron Hills (H-03) Production Facility Meteorological Station Report May 13, 2005* (Campbell Scientific, 2005) was provided to the NEB on May 26, 2005.

AGAT modified the meteorological station on July 4, 2005, to capture wind speed and wind direction data remotely from an adjacent AGAT polling system. Data was downloaded from the meteorological data logger on a regular basis with some exceptions. In 2010, a new air monitoring trailer with a new meteorological station including RM Young 5103 for wind speed and direction measurements and CS 500 probe to gauge temperature and relative humidity was installed. In March of 2012, the air quality station was moved to the southeast of the camp.

Promet Environmental Group Ltd. was retained for the data collection services from December 2013 to March 2015. Strategic received approval from OROGO allowing the

continuous ambient air monitoring to be discontinued while the Cameron Hills operations were shut-in; therefore, there was no meteorological monitoring in 2022.

3.5 Passive Monitoring at the H-03 Central Battery

Strategic operates two passive monitoring stations, one in the northwest quadrant and the other in the southwest quadrant of the H-03 central battery. The monitors were installed in March 2004.

Passive sampling involves the exposure of a reactive surface to air. These monitors transfer SO_2, NO_2 and H_2S by diffusion from the air to the reactive surface. The samples are collected monthly and laboratory analysis is performed to quantify concentrations of gases.

OROGO granted Strategic approval to discontinue the passive monitoring while the Cameron Hills operations are ceased. Accordingly, there were no monthly passive monitoring results for 2022.

3.6 Continuous Ambient Air Quality Monitoring Station

AGAT installed a continuous ambient air monitoring station at the Cameron Hills H-03 Facility on March 1, 2005. Details of the equipment were provided to the NEB on May 26, 2005, in an AGAT report entitled *Air Quality Monitoring Technical Documentation May 2005* (AGAT, 2005).

In March 2011, a new ambient air monitoring station (AIRPATROL System) was installed, designed by Diagnostic Engineering. In a letter dated July 27, 2011, the NEB stated that the primary purpose of the air monitoring station, in regard to SO_2 and NO_2 monitoring, has been fulfilled and the three-year time commitment has been met. The NEB granted suspension of continuous SO_2 and NO_2 monitoring on or after October 27, 2011. The NO_2 and SO_2 Diagnostics AIRPATROL System were discontinued at the beginning of November 2011.

The following monitoring equipment comprises the current continuous air quality monitoring station:

- H2S Analyzer (T101)
- Campbell Data Logger (CR800)
- Gas Dilution Calibrator (Sabio 2010)
- Modem (Sixnet BT-6800)
- Wind Head (Young)
- Gas Cylinders (Zero Air and Calibration Gas [H2S])
- Regulators for Calibration Gas and Zero Air (Pro Star Platinum)
- Exhaust Fan (Canarm S8-B2)
- Air Conditioner (Friedrich UE09C13)
- Breaker Box (Federal Pioneer)

The continuous monitoring station did not operate in 2022.

3.7 Management of Fugitive Emissions

Strategic has committed to following the Canadian Association of Petroleum Producers *Best Management Practice for the Management of Fugitive Emissions at Upstream Oil and Gas Facilities* (CAPP, 2007). Cameron Hills was not part of Strategic's fugitive emissions management program in 2022 as operations remained shut-in.

4.0 EROSION MONITORING

4.1 Remediation Plan

Following a September 2016 inspection of Cameron Hills by the GNWT Lands Department on behalf of the Mackenzie Valley Land and Water Board, Strategic was required to prepare a Remediation Plan (the Plan) to address the unacceptable conditions outlined in the inspection; several of the unacceptable conditions noted in the inspection report were erosional in nature. Strategic proposed to remediate or mitigate the deficiencies over a 5-year period. 2021-2022 is the fifth year of the plan.

Under the MVLWB Storage Authorization, no remediation or mitigation activities took place in 2022.

4.2 Annual Sediment and Erosion Assessment

As previously reported, in September 2018, Strategic personnel implemented a pilot erosion mitigation test at N-06. Hemp erosion control blankets were installed to reduce the exposed surface soils and limit the transportation and sedimentation observed at the location. Relative percent vegetation will be monitored and used as an indicator parameter of the N-06 sediment and erosion control pilot test.

In September 2021, EnviroSearch Ltd. (EnviroSearch) was commissioned by Strategic to conduct a sediment and erosion control survey to satisfy conditions of the Type A Water Licence (MV2010L1-001) and Land Use Permit (MV2013A0010). The field program included reconnaissance and documentation of the 15 medium- to high-risk sites previously identified in the Amber EnviroServices Inc. March 2019 *Sediment Erosion Control Survey Report for Cameron Hills Project Areas* (Amber EnviroServices, 2019) including the N-06 hemp erosion control blanked pilot project. Additionally, observations were documented and risk ratings assigned for six remote sumps that were backfilled/contoured in the winter of 2018/19, two leases (P-17 and B-38) and four pipeline ROWs (I-73, 2M-73, E-72, and N-06) where erosion and subsidence remediation was conducted in Q1 2019. No survey was conducted in 2022.

5.0 REPORTABLE SPILLS

There were no releases reported in 2022 in Cameron Hills.

6.0 REMEDIATION

There were no remediation activities at the Cameron Hills contaminated sites prior to 2022; a summary of the status of these sites is provided in the table below.

Table 4 Cameron Hills Contaminated Sites Status Summary

Site	Cause	Previous Remediation Activities	2022 Activities
H-03 Facility	2011 - Produced water spill from a corrosion leak in an above-ground drainage line.	• At time of spill, the west runoff pond water was sampled, and results indicated salinity, Cl^- and Na values were in excess of the MVLWB Type A water licence criteria. Visibly contaminated soil was removed and placed in waste containers. • January 2012, the pond fluid was pumped out and disposed at a Class II Disposal Facility. • Water pond sampling in May and October 2012 confirmed elevated levels of dissolved Cl^-, EC, TDS, dissolved Fe and Na. • Soil sampling results in 2013 were below the applicable soil criteria. Water analyses indicated exceedances of Type A water licence guidelines for Cl^-, TDS, dissolved Na and Fe (Solstice Canada Corp., 2013a, 2013b). • In 2014, analysis results indicated that no soil parameters along the spill pathway were above the applicable criteria; water analysis from the east and west ponds were below the applicable criteria. PHC fractions F2 and F3 were above the applicable guidelines at the spill location (North Shore Consultants, 2014b).	• No remedial activities occurred in 2022.

Site	Cause	Previous Remediation Activities	2022 Activities
H-03 Facility	2012 – Water and oil release from flare stack.	• In 2012, spill contents on the snow-covered ground was removed with a backhoe and trucked to an approved waste management facility. • Soil sampling results from 2014 indicated that PHC fractions F2 and F3 were above the applicable guidelines at two sampling locations at depths ranging from 0.0 to 0.2 m bsgl. SAR levels at one sampling location were greater than the remediation objectives (North Shore, 2014c).	• No remedial activities took place in 2022.
M-74 Wellsite	August 2014 – methane and produced water and oil release from corrosion damage in production casing.	• Strategic personnel supervised the containment, recovery, and remediation activities associated with the 50 x 30 m release. • Soil samples were taken shortly after the spill cleanup. The release area was characterized with PHC, B, Pb, EC and SAR values that did not meet the applicable remediation guidelines. Laboratory interpretation of the PHC chromatograms indicated that several samples were characteristic of biogenic hydrocarbons not associated with the release (North Shore, 2014a). • A second assessment was completed in September 2014. Samples from the spill area indicated PHC, B, EC and SAR values did not meet the applicable remediation guidelines. Hydrocarbon fraction F3 may be naturally occurring. • A water sample was collected in the former spill area and all parameters met the applicable water criteria.	• Clean up activities took place on March 10, 2015. A steam truck was used to clean infrastructure and tarps and containment trays were used to prevent further spill contamination. • There was no evidence of contamination to surface ground.

7.0 UPDATE TO EA03-005 COMMITMENTS

At present, Strategic is not aware of any areas of non-compliance with respect to EA03-005 commitments.

8.0 CONFIRMATION BY OFFICER

The information in this report was provided in accordance with OA-2018-003-SOG and the *Oil and Gas Drilling and Production Regulations* Section 86.

STRATEGIC OIL & GAS LTD. AND STRATEGIC TRANSMISSION LTD.
by and through

Alvarez & Marsal Canada Inc.,
in its capacity as Receiver of Strategic Oil & Gas Ltd. and Strategic Transmission Ltd.'s NWT Properties and not it its personal or corporate capacity

Per: Duncan MacRae
Title: Vice President

Date: March 31, 2023

9.0 REFERENCES

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